

**Annual Certification Documentation
Per Texas Education Code 51.3525**

Colleges by Name (H)

September 2024

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ELECTRONIC SIGNATURE ACKNOWLEDGEMENT AND CONSENT FORM

I, Tom Mills, agree and understand that by signing the Electronic Signature Acknowledgment and Consent Form, that all electronic signatures are the legal equivalent of my manual/handwritten signature and I consent to be legally bound to this agreement. I further agree my signature on this document is as valid as if I signed the document in writing. This is to be used in conjunction with the use of the electronic signature for the submission of the SB17 Annual Certification required by 51.3525(e) that I elected to have signed electronically. Under penalty of perjury, I herewith affirm that my electronic signature was signed by myself with full knowledge and consent and am legally bound to these terms and conditions.

Tom Mills
Signature

8-13-2024
Date

Please check one:

- President
 Board Chair

ELECTRONIC SIGNATURE ACKNOWLEDGEMENT AND CONSENT FORM

I, David Teel, agree and understand that by signing the Electronic Signature Acknowledgment and Consent Form, that all electronic signatures are the legal equivalent of my manual/handwritten signature and I consent to be legally bound to this agreement. I further agree my signature on this document is as valid as if I signed the document in writing. This is to be used in conjunction with the use of the electronic signature for the submission of the SB17 Annual Certification required by 51.3525(e) that I elected to have signed electronically. Under penalty of perjury, I herewith affirm that my electronic signature was signed by myself with full knowledge and consent and am legally bound to these terms and conditions.


Signature

8/20/24
Date

Please check one:

- President
- Board Chair

Institution: Houston Community College
Date Submitted: 08/30/24
Pages: 257



HOUSTON COMMUNITY COLLEGE

Senate Bill 17 Certification Report

August 28, 2024

Houston Community College submits this summary Report in support of its Senate Bill 17 Certification pursuant to Section 51.3525(e) of the Texas Education Code.

I. Overview of Houston Community College

Houston Community College (HCC) is an urban, open-admission, public institution of higher education offering a high-quality, affordable education for academic advancement, workforce training, career development, and lifelong learning. In 2023, HCC enrolled more than 85,000 students and employed approximately 6,100 employees. HCC is organized as a public junior college district under Chapter 130 of the Texas Education Code, with a service area encompassing a 631 square mile area, including the Houston Independent School District, Katy, Spring Branch, Alief Independent School Districts, Stafford Municipal District, and the Fort Bend portion of Missouri City.

HCC's chief executive officer is Dr. Margaret Ford Fisher, Chancellor. HCC is governed by a nine-member elected board of trustees. The chair of the board is Dr. Cynthia Lenton-Gray. The board of trustees reviewed and approved submission of this Certification Report at a public meeting held on August 7, 2024.

II. Institutional Actions to Comply with Section 51.3525 of the Texas Education Code

Since enactment of Senate Bill 17, HCC has diligently pursued a course of action to implement the law. This report summarizes key actions toward implementation. In addition, HCC has uploaded several supporting documents to the Coordinating Board's portal that demonstrate compliance in the past fiscal year.

- HCC's efforts began immediately following enactment of Senate Bill 17 with elimination of its DEI officer position and DEI council (*see* HCC Exhibit F) and by engaging its legal counsel and key leaders to plan a systematic review of **HCC's operations. Thereafter, the Chancellor appointed a Senate Bill 17 Task Force** consisting of key administrators as well as internal and external counsel. The Task Force met weekly between September 25, 2023, and December 7, 2023, to identify steps and coordinate efforts necessary to ensure compliance



throughout the HCC organization. Key organizational leaders included administrators from Talent Relations, Communications, Instructional Services, and Student Services, in addition to HCC's legal counsel. Priorities included revision of the Board's Strategic Plan and preparation of new and amended official Board policies to align with the new law. *See* HCC Exhibit B (HCC's Policy Updates) and HCC Exhibit C (HCC's Strategic Plan Updates). After extensive drafting and review by legal counsel and relevant administrators, the Board approved revisions to the Strategic Plan and several local policies on November 15, 2023. The relevant policies are Policy BI (authorizing the chancellor to testify before the Legislature about HCC's compliance efforts), Policy CFE (vendor relations), Policy DAA (equal employment opportunity and restrictions on DEI), Policy FA (equal educational opportunity), and Policy BFA (chief executive officer qualifications and duties)). *See* HCC Exhibit B. The policies were updated and enhanced on April 17, 2024, following recommendations from the Texas Association of School Boards Community College Division regarding Texas Education Code § 51.3525. *See* HCC Exhibit B.

- Once the Strategic Plan was revised and essential policies were adopted by the Board and made publicly available to employees, the Task Force turned its attention to ensuring that institutional practices were aligned and that each **department understood how the law would be implemented. This was achieved** in part by communicating to all departmental heads the operations and activities that they would need to evaluate within their respective areas. For example, leaders within Talent Engagement (HCC human resources) reviewed documents and training materials used during the employee selection process **to ensure compliance with Senate Bill 17's requirements relating to hiring. On** December 12-13, 2023, key leaders received an attestation letter specifying the requirements and requesting that they attest to Senate Bill 17 compliance for the business area(s) under their supervision and control. Each letter was **individually tailored to the recipient and sought confirmation of compliant practices on an operational level. Recipients were encouraged to seek guidance** regarding any areas of uncertainty or potential noncompliance. All attestations were received by the Office of General Counsel by March 5, 2024. On July 23, 2024, key leaders received an updated attestation letter requesting that they attest to Senate Bill 17 compliance for the business area(s) under their supervision and control due to shifts in responsibilities under those business areas and changes to staffing in those roles. All attestations were received by the Office of General Counsel by August 7, 2024. *See* HCC Exhibit D.
- The Houston Community College has taken additional steps to ensure compliance with the mandates of Texas Education Code § 51.3525. These



include renaming and realigning the responsibilities of the Office of Institutional Equity to the Office of Equal Opportunity and Title IX (see HCC Exhibit F) to comply with Senate Bill 17, conducting a sweep of the HCC website for potentially non-compliant material, reviewing proposed contracts for compliance, and creating a webpage to inform the community about Senate Bill 17, including a link to “frequently asked questions.” The website also includes an email address that may be used to submit questions or seek compliance assistance. See HCC Exhibit A and <https://www.hccs.edu/about-hcc/transparency/senate-bill-17/>. The DEI Compliance Oversight Team, housed in the Office of the General Counsel Division, addresses questions as they arise, provides educational support on the requirements of the law, and updates the SB 17 website and FAQ as may be needed. See HCC Exhibit A.

III. Supporting Documentation to this Certification

In support of its Certification, HCC has submitted the following documentation as HCC Exhibits A-F:

A. HCC’s Senate Bill 17 Website: <https://www.hccs.edu/about-hcc/transparency/senate-bill-17/>

1. On December 12, 2023, HCC created a website with a link to the Texas Association of School Boards Community College (TASB) FAQ on Diversity, Equity, and Inclusion Initiatives.
2. On April 3, 2024, HCC website updated the webpage to include a section titled “Further Support” which provides an e-mail address for an individual or department to submit unanswered questions or novel issues for SB 17 compliance assistance and updated link to TASB FAQs.
3. On July 11, 2024, HCC updated the website to include an HCC-specific Frequently Asked Questions (FAQs) Regarding Diversity, Equity, and Inclusion Activities (Senate Bill 17).
4. On July 25, 2024, an e-mail was sent to all faculty and staff, the “HCC Family,” to direct them to the institutional SB 17 Compliance Resources located on the website.

See HCC Exhibit A (HCC’s Senate Bill 17 Website).

B. HCC’s Policy Updates

Local policy revisions or additions approved at Board of Trustees Regular Meeting on November 15, 2023:

1. BI (LOCAL): Delegation of Reporting Authority



2. **BFA (LOCAL): Chief Executive Officer: Qualifications and Duties**
3. **CFE (LOCAL): Purchasing and Acquisition – Vendor Relations**
4. **DAA (LOCAL): Employment Objectives: Equal Employment Opportunity**
5. **FA (LOCAL): Equal Educational Opportunity**

Local policy revisions or additions approved at Regular Meeting of the Board of Trustees on April 17, 2024:

6. **BG (LOCAL) [new]: Administrative Organization**
CFE (LOCAL): Purchasing and Acquisition – Vendor Relations
DAA (LOCAL): Employment Objectives: Equal Employment Opportunity
FA (LOCAL): Equal Educational Opportunity

See HCC Exhibit B (HCC's Policy Updates).

C. HCC's Strategic Plan Updates

1. **Approved at Board of Trustees Regular Meeting on November 15, 2023: Revisions to Strategic Plan: Embracing Houston's Future approved, previously adopted by the Board of Trustees in December 2019**
2. **Update presented to the Board of Trustees Committee of the Whole Meeting on April 3, 2024: Continuation from November 2023, by introducing a streamlined Strategic Plan**

See HCC Exhibit C (HCC's Strategic Plan Updates).

D. Senate Bill 17 Compliance Attestation Letters

Attached are letters executed by 15 key officials from Chancellor's Executive Council:

1. Chief Facilities Officer
2. Chief Information Officer
3. Chief of Staff (Interim) & Vice Chancellor, Public Information, Communications, & External Affairs
4. Executive Director, HCC Foundation
5. President, Central College
6. President, Coleman College
7. President, Northeast College
8. President, Northwest College
9. President (Interim), Online College
10. President, Southeast College & Vice Chancellor (Interim), Student Services



11. **President, Southwest College and Vice Chancellor, Workforce**
12. **Senior Vice Chancellor, Finance & Administration, Chief Finance Officer & Chief Business Officer**
13. **Senior Vice Chancellor (Interim), Instructional Services & Student Services and Chief Academic Officer**
14. **Vice Chancellor (Interim), Strategy, Planning & Institutional Effectiveness**
15. **Vice Chancellor, Talent Engagement & Chief Human Resources Officer**

In addition, attached are additional attestation letters sent on July 23, 2024 and executed by 20 key officials:

1. Chief Facilities Officer
2. Chief Information Officer
3. Chief of Staff (Interim) & Vice Chancellor, Public Information, Communications, & External Affairs
4. Executive Director, HCC Foundation
5. **President (Interim), Central College**
6. **President (Interim), Coleman College**
7. President, Northeast College
8. President, Northwest College
9. **President (Interim), Online College**
10. President, Southeast College
11. President, Southwest College
12. President (Interim), Southwest College
13. Senior Vice Chancellor (Interim), Instructional Services & Student Services and Chief Academic Officer
14. Vice Chancellor (Interim), Administration & Operations
15. Vice Chancellor (Interim), Finance
16. Vice Chancellor (Interim), Instructional Innovation & Digital Strategy
17. Vice Chancellor (Interim), Instructional Services
18. **Vice Chancellor (Interim), Strategy, Planning & Institutional Effectiveness**
19. Vice Chancellor (Interim), Student Services
20. Vice Chancellor, Talent Engagement & Chief Human Resources Officer

See Exhibit D (HCC's Senate Bill 17 Compliance Attestation Letters).

E. HCC's Response to State Auditor's Inquiry

On April 30, 2024, HCC sent its Response to the State Auditor's Office regarding Senate Bill 17: Request for Information received April 17, 2024, regarding policies, procedures, and guidelines to ensure that state funds are not spent in violation of Senate Bill 17 (SB17); points of contact; a planned internal audit; and timely certification.



See HCC Exhibit E (HCC's Response to State Auditor's Inquiry).

F. HCC's Other Supporting Documentation

1. On June 23, 2023, an e-mail was sent to all faculty and staff, the "HCC Family," to inform them of the elimination of the Diversity, Equity and Inclusion (DEI) Officer position. Dr. Darin Baskin, the interim DEI Officer, was returned to his prior position as Director of Quality Enhancement Plan.
2. On July 31, 2023, the Diversity, Equity, and Inclusion (DEI) Council was sunsetted.
3. The Office of Institutional Equity was renamed and refocused to the Office of Equal Opportunity and Title IX. <http://www.hccs.edu/oeotix/>

See HCC Exhibit F (HCC's Other Supporting Documentation).

Margaret Ford Fisher

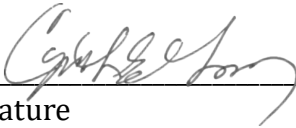
Dr. Margaret Ford Fisher
Chancellor
Houston Community College

08/29/2024

August 29, 2024

ELECTRONIC SIGNATURE ACKNOWLEDGEMENT AND CONSENT FORM

I, Dr. Cynthia Lenton-Gary, agree and understand that by signing the Electronic Signature Acknowledgment and Consent Form, that all electronic signatures are the legal equivalent of my manual/handwritten signature and I consent to be legally bound to this agreement. I further agree my signature on this document is as valid as if I signed the document in writing. This is to be used in conjunction with the use of the electronic signature for the submission of the SB17 Annual Certification required by 51.3525(e) that I elected to have signed electronically. Under penalty of perjury, I herewith affirm that my electronic signature was signed by myself with full knowledge and consent and am legally bound to these terms and conditions.



Signature

8/30/24

Date

Please check one:

- President
- Board Chair



Exhibit A:
HCC's Senate Bill 17 Website



About HCC



Senate Bill 17

Senate Bill 17 (SB 17), which amends Texas Education Code 51.5325 effective January 1, 2024, prohibits public institutions of higher education from engaging in certain diversity, equity, and inclusion conduct. Beginning with fiscal year 24-25, the new law requires that Houston Community College annually certifies compliance to the Legislature and the Texas Higher Education Coordinating Board before state-appropriated funds may be spent. As a result, compliance is critically important. To that end, on November 15, 2023, the Board revised its Strategic Plan and amended Board policies to ensure compliance with SB 17.

To help clarify what the law covers and the College's responsibilities going forward, please review the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) posted below. As an additional resource, [the Texas Association of School Boards Community College Services has provided helpful FAQs.](#)

While Senate Bill 17 has brought about changes, rest assured that HCC strives to implement a vision that fosters success for all students, faculty and staff from all backgrounds and perspectives in a welcoming environment.

Further Support

An individual or department may submit unanswered questions or novel issues for SB 17 compliance assistance and review to HCC's Texas DEI Compliance Oversight Team at

txdei.compliance@hccs.edu.

Frequently Asked Questions (FAQs) Regarding Diversity, Equity, and Inclusion Activities (Senate Bill 17)

1. OVERVIEW OF SENATE BILL 17

1.1 What is Senate Bill 17?

Senate Bill 17 is a Texas law that restricts diversity, equity, and inclusion activities in higher education relating to race, sex, color, ethnicity, sexual orientation, and gender identity. The law affects employees, students, contractors, and others who participate in HCC activities and programs. The law can be found at Section 51.3525 of the Texas Education Code. See also HCC Policies BG (Local) and DAA (Local).

Under Section 51.3525, the following activities are prohibited except when required by federal law:

- **A college may not establish or maintain a DEI office or hire an employee or contractor to perform DEI duties.** A DEI “office” includes any office, department, task force, or unit.

A college may not compel, require, induce, or solicit a DEI statement from any person or give preferential treatment to a person who provides a DEI statement. The statute does not define the phrase “DEI statement,” but common dictionary definitions of “statement” include both oral and written expressions. A DEI statement is essentially a pledge or commitment to support DEI initiatives based on race, color, ethnicity, gender identity, or sexual orientation. If an individual voluntarily provides a DEI statement to HCC even if one is not requested, HCC cannot treat that individual more favorably or less favorably than individuals who did not provide a similar statement. A “DEI statement” does not include a non-discrimination statement, which typically includes a statement of federal and state law obligations.

- **A college may not give preference on the basis of race, sex, color, ethnicity, or national origin to any employee, applicant, or any person participating in a college “function.”** The law does not define “function,” but the ordinary and common meaning of the term “function” suggests that it applies to all facets of college operations.
- **A college cannot make DEI training a condition of enrollment or a condition of participating in a college function unless required by federal law or approved in accordance with a process outlined in Senate Bill 17.** A DEI training encompasses a training, program, or activity “designed or implemented” in reference to race, color, ethnicity, gender identity, or sexual orientation. The prohibition applies even if the activity is not labeled an official training program, such as a mandatory staff meeting where DEI instruction is provided. The law permits trainings that are designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation when they are (i) developed by an attorney and (ii) approved in writing by the college’s legal counsel and the Texas Higher Education Coordinating Board solely to ensure compliance with a court order or state or federal law.



1.2 What is “DEI” under Senate Bill 17?

“DEI” is an umbrella term that generally refers to college activities that promote diversity, equity, and inclusion with respect to certain demographic identities. Section 51.3525 defines “DEI office” as an office, division, or unit established for the purpose of:

- Influencing hiring or employment practices with respect to race, sex, color, or ethnicity. Hiring processes must be “color-blind and sex-neutral” and comply with state and federal anti-discrimination laws.
- Promoting or providing “differential treatment” or “special benefits” to people on the basis of their race, color, or ethnicity.
- Promoting policies or procedures “designed or implemented” in reference to race, color, or ethnicity other than those approved by the college’s legal counsel and the Coordinating Board to comply with a court order or state or federal law.
- Conducting trainings, programs, or activities “designed or implemented” in

reference to race, color, ethnicity, gender identity, or sexual orientation unless the training was developed by an attorney and approved by the college's legal counsel and the Texas Higher Education Coordinating Board to comply with a court order or state or federal law.

1.3 What are “differential treatment” and “special benefits” under the law?

Section 51.3525 prohibits programs and policies that promote or provide “differential treatment” or “special benefits” on the basis of race, color, or ethnicity. Section 51.3525 does not define these terms. Under federal anti-discrimination laws, the concept of “differential treatment” refers to situations in which similarly situated people are treated differently – more favorably or less favorably – because of their identification with a particular classification, such as their race or national origin. A “special benefit” generally refers to a privilege, opportunity, or term of employment that is granted to a particular person or group because of their identification with a particular classification.

When an employee receives a benefit that is generally available to others on an equal basis, providing the benefit to the employee will not violate Section 51.3525. For example, if a college allows employees to reserve a conference room for an after-work gathering, it would not constitute a “special benefit” if the college were to allow a group of Black employees or Asian employees to reserve a conference room. Denying this benefit to a group of employees because they are Black or Asian could constitute unlawful discrimination under federal law.

1.4 Section 51.3525 prohibits DEI activities “except as required by federal law.” What federal laws apply?

A partial list of applicable federal laws includes the following:

- *First Amendment to the U.S. Constitution* – Provides for freedom of speech in most contexts. Prohibits discrimination against employees, students, and others based on their viewpoint or their association with other individuals.
- *Fourteenth Amendment to the U.S. Constitution* – Requires equal protection of the law by governmental entities, including public colleges.
- *Title VII of the Civil Rights Act* – Prohibits employment discrimination and harassment on the basis of race, color, national origin, religion, sex, sexual orientation, gender identity, pregnancy, and pregnancy-related conditions.
- *Title VI of the Civil Rights Act* – Prohibits discrimination and harassment against students and others on the basis of their race, color, or national origin.
- *Title IX of the Education Amendments of 1972* – Prohibits discrimination and harassment against students and others on the basis of sex, pregnancy, childbirth, and related conditions. The U.S. Department of Education has determined that Title IX also prohibits discrimination on the basis of sexual orientation and gender identity, but this issue is the subject of litigation in the courts (July 2024).

1.5 May employees participate in DEI activities on their own time?

Yes. The prohibitions of Section 51.3525 pertain to work-related activities and use of work-related resources. The law does not restrict faculty members and other employees who choose to participate in DEI activities on their own time, such as attending a political event or publishing an article on a DEI subject.

Public employees have a First Amendment right to freedom of expression that protects an individual's speech as a private citizen on matters of public concern. As a general matter, an institution may not discipline employees for their private off-duty speech unless the speech substantially disrupts college operations or impairs the efficiency of college operations.



1.6 Does Senate Bill 17 prohibit use of the words “diversity,” “equity,” and “inclusion” in policies, programs, and activities?

The language of the statute does not prohibit use of these terms. It is a question of context. For example, it would not violate Senate Bill 17 to prepare a brochure that describes the City of Houston as a “diverse” community. In addition, certain activities are excluded from Senate Bill 17, including academic course instruction; therefore, it would not violate the law for a faculty member to reference these terms during academic course instruction. (See [Section 2.1](#) below.) Under Senate Bill 17, these terms are most likely to be objectionable when used to describe or promote programs and activities relating to race, sex, color, ethnicity, sexual orientation, and/or gender identity.

2. WHAT ACTIVITIES ARE EXCLUDED FROM SENATE BILL 17?

2.1 Academic Course Instruction

The law excludes “academic course instruction.” Institutions and faculty retain the freedom to decide what to teach and how to teach the required curriculum in the classroom, clinical programs, seminars, and other instructional settings. Classroom discussions, assignments, and readings may address race, sex, national origin, gender identity, and sexual orientation without violating Section 51.3525.

Although Section 51.3525 does not apply to academic course instruction, under HCC policy, information presented during academic course instruction must relate to the subject being taught, and faculty must maintain respect for students as learners. Under HCC Policy DGC (Local), an HCC faculty member shall “strive to be accurate in his or her statements and to be willing to listen to and show respect for others who express different opinions.” HCC

faculty may not, during academic course instruction, discriminate against or harass students based on their race, color, national origin, sex, disability, religion, sexual orientation, gender identity, pregnancy, pregnancy-related conditions, or veteran/military status. See HCC Policy FA (Local), Policy FAA (Legal), FFDA (Local), FFDB (Local).

Under HCC policy and Texas law, curriculum is a shared responsibility between faculty and the college administration. See HCC Policy EE (Local); HCC Policy EFA (Legal); EFAA (Legal); Texas Educ. Code § 51.96851(b)–(c); 19 Texas Admin. Code § 4.103, 4.104(b)–(c). HCC is committed to maintaining an educational community founded on the free and open exchange of ideas. HCC's education philosophy is to “encourage students to develop their skills, both personal and academic; to take responsibility for their education; to become flexible in order to meet the constantly shifting demands of a rapidly developing world; to appreciate their culture and those of other societies; and to cultivate excellence.” See HCC Policy DF (Local), *Curriculum Design*.

Under the “academic course instruction” exception, faculty may:

-
- invite a guest speaker to a class to discuss a DEI-related topic when related to the subject matter of the course
- award extra credit points to students if they attend a DEI-related activity if the activity is related to the subject matter of the course and is the type for which extra credit typically would be available
- include a DEI statement in their course syllabus, but any such statement must be consistent with HCC policies and procedures that prohibit unlawful discrimination against students. Faculty may not include statements that suggest to students that they are not welcome or that they must agree with the faculty member to be successful in the course. When a faculty member includes a diversity statement on a syllabus, the faculty member should consider referencing HCC's anti-discrimination policy as well. HCC department chairs, program directors, and supervisors may not direct or encourage faculty members to include a DEI statement on their syllabi.



2.2 Scholarly Research and Creative Works

Section 51.3525 states that it does not restrict scholarly research or creative works. The law does not define these terms. However, consistent with the common usage of these terms, the exception for scholarly research reasonably encompasses the following:

- Research conducted by faculty and by students under generally accepted scientific standards.
- Grant applications to support scholarly research.
- Faculty publications summarizing the faculty member's research.
- Public presentation of scholarly research.

The exception for creative works includes academic work product (such as a book), a musical composition or theater production, a painting, and publications or proposals reflecting ideas, analysis, or interpretation.

2.3 Student Organizations

The law excludes activities of registered or recognized student organizations. The law does not define “activity,” but the ordinary and common meaning of the term “activity” indicates all activities and functions organized by a student group, such as meetings, fundraising, and special programs. Section 51.3525 does not prohibit identity-based affinity organizations for students, such as a group focused on Hispanic students or an LGBTQ club. Student organizations may engage in activities with DEI content.

- **May the College provide funding to an identity-based student organization?** Yes, so long as the student organization is being treated as any other registered student organization. HCC must provide resources, benefits, and support to registered student organizations in a non-discriminatory manner. Providing support on a neutral basis does not constitute a special benefit. Failing to provide benefits and support to similarly situated student organizations could constitute unlawful discrimination and violate federal law. It also may violate Section 51.9315 of the Texas Education Code, which prohibits an institution from taking action against, or denying a generally available benefit to, a student

organization based on the organization's academic, political, religious, ideological, or philosophical views or the group's expressive activities.

- **May HCC academic departments co-sponsor identity-based programs with student organizations when the program promotes or provides differential treatment or special benefits based on race, color, or ethnicity?** Departments may not sponsor a program or activity “designed or implemented” in reference to race, color, ethnicity, gender identity, or sexual orientation. Individual employees on their own time in their personal capacity may speak at an event sponsored by a student organization.
- **May an HCC employee serve as an advisor to a registered student organization?** Yes, so long as the student organization is treated as any other student organization. When an institution's policies require that all registered student organizations have an advisor, then the institution must apply its policies consistently to all registered student organizations. Providing support on a neutral basis does not constitute a special benefit.

2.4 Guest Speakers & Performers on Short-Term Engagements

The DEI restrictions in Section 51.3525 do not apply to guest speakers or performers on a short-term engagement. Guest speakers and performers on short-term engagement may speak on campus subject to HCC's regular policies and procedures for visitors. Guest speakers would include persons who speak at a commencement ceremony or who speak to a class at the invitation of a faculty member. A guest speaker in a class also would be covered by the academic instruction exception. HCC employees are not “guest speakers” under the law. Contractors who are brought in to provide DEI training are not “guest speakers” under the law.

2.5 Data Collection

Section 51.3525 does not apply to data collection, such as collecting

demographic data showing retention and drop-out rates among certain populations. Data collection also may be covered by other exceptions, including exceptions for scholarly research and student recruitment. In addition, Section 51.3525(j) specifically requires institutions and the Texas Higher Education Coordinating Board to conduct a study of the impact of Senate Bill 17. The study must examine data showing rates of student applications, acceptance, matriculation, retention, graduation, and grade point average, disaggregated by race, sex, and ethnicity.

Are there restrictions on how HCC may use data that it has collected?

The publication or use of data in most contexts will not violate Section 51.3525. The lawfulness of the proposed use will depend on the facts and circumstances, such as the purpose for presenting the data. An employee who plans on using data should evaluate whether the use is consistent with Section 51.3525. Some uses will fall under an exception to Section 51.3525, such as academic course instruction or the student recruitment exception. For example, it would be permissible to use demographic data in a student recruitment brochure. Data also may be used to comply with state and federal reporting obligations. Data may be used to provide factual information about HCC. For example, a college webpage may factually describe enrollment trends. However, it would be impermissible to use demographic data for the purpose of influencing a hiring committee to make employment decisions based on race, sex, color, or ethnicity.

2.6 Student Recruitment and Admissions

Section 51.3525 does not apply to student recruitment and admissions such as outreach activities. This exception also reasonably encompasses training of employees who work in recruiting and admissions to ensure compliance with legal requirements. The content of such training programs must be reviewed by the relevant HCC leaders to ensure compliance with Section 51.3525 and to avoid inadvertently violating the prohibition on mandatory DEI training.

In addition, although Section 51.3525 does not restrict student recruitment and admissions, certain federal laws do apply to these activities and may

restrict certain recruiting activities that are open only to students of a particular race, national origin, or other protected classes. When designing, implementing, or funding recruiting activities that may be aimed at a population based on race or other covered identity, employees should seek guidance from the Office of the General Counsel to ensure compliance with any applicable federal requirements.

2.7 Policies and Programs to Enhance Student Achievement

Section 51.3525 does not prohibit policies and programs to enhance student achievement and post-graduate outcomes that are designed and implemented without regard to race, sex, color, or ethnicity. Nothing in Section 51.3525 prohibits a retention program aimed at low-income students who are the first in their family to attend college. Nor would it prohibit training employees on how to recognize or assist students who are low-income or are at risk of dropping out. Programs and activities that assist students in securing internships and career opportunities are permissible. Programs and activities must be implemented on a non-discriminatory basis.

3. DOES SENATE BILL 17 AFFECT GRANTS AND ACCREDITATION?

3.1 May HCC apply for a grant that requires performance of DEI-related work?

Section 51.3525 states that, in the context of applying for grants or responding to accrediting organizations, it does not limit or prohibit institutions or their employees from making statements that highlight the

institution's work in supporting first-generation students, low-income students, or underserved student populations. Section 51.3525 also does not prohibit an institution from certifying compliance with state and federal anti-discrimination laws. Section 51.3525 would not prohibit HCC from responding to a grant application by providing factual information such as statistical demographic data describing underserved student populations.

When preparing an application for a grant, personnel must evaluate the purpose and requirements of each grant and determine whether HCC is able to fulfill the requirements of the grant consistent with HCC's obligations under Section 51.3525. For example, if a grant proposal directly relates to a statutory exception, such as student recruitment, then the DEI restrictions would not apply (see [Section 2.2](#)).

3.2 May HCC continue to participate in a grant – awarded prior to the effective date of Senate Bill 17 – if it requires the performance of DEI-related work?

Section 51.3525 generally does not impair or change pre-existing grants and contracts. A Texas statute is presumed to be prospective in its operation unless expressly made retrospective. See Texas Gov't Code, § 311.022; Texas Const., § 16, Art. I.) The effective date of Senate Bill 17 is January 1, 2024, and the law contains no retroactivity language; therefore, it presumptively does not impair or affect pre-existing contracts, including grants in progress.

However, college leaders should carefully evaluate the facts and circumstances surrounding each specific grant, including whether the terms of the grant actually require activities that would violate Section 51.3525 and whether the grant activities fall under an exception, such as the exception for student recruitment. If a question arises regarding a specific grant, program leaders should contact the Office of the General Counsel for guidance on whether continued participation in a grant is permissible and whether other alternatives would be possible, such as asking the grantor about modification of the grant terms.

If the grant is a federal grant, then the Education Department General Administrative Regulations (EDGAR) also must be considered. See <https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>. Federal regulations state that grants must be administered “in full accordance with the U.S. Constitution, Federal Law, and public policy requirements: Including, but not limited to, those protecting free speech, religious liberty, public welfare, the environment, and prohibiting discrimination.” 2 C.F.R. § 200.300, Appendix II; 34 C.F.R. § 75.500(a) & (b). Program leaders should consult with the Office of the General Counsel regarding whether particular requirements are required by federal law.

3.3 What does “underserved” population mean in Senate Bill 17?

Section 51.3525 allows HCC to highlight its work in support of underserved students. However, the law does not define “underserved.” In related contexts, the term “underserved” has been used to describe historical data and trends across communities and populations and how these populations access resources. “Underserved” generally refers to challenges and barriers that impact access to resources, college readiness, and retention. Barriers can be financial, educational, geographic, or related to inadequate housing, transportation, or lack of language proficiency. Evaluating whether a population in the community has been underserved may involve analysis of enrollment trends, retention, credentials awarded, and similar data.

3.4 What are HCC’s obligations when an accrediting organization imposes a DEI expectation or asks about program diversity?

HCC will need to evaluate each accreditation standard or inquiry and

determine whether an exception to Section 51.3525 applies (such as student recruitment) and, if not, whether it is possible to satisfy the organization's requirements by providing information that explains HCC's commitment to equal educational opportunity and that highlights HCC's work in supporting first-generation students, low-income students, or underserved student populations. In other instances, it may be appropriate to confer with the accrediting organization about the requirements and the restrictions imposed by Section 51.3525.

4. EMPLOYMENT AND HUMAN RESOURCES QUESTIONS UNDER SENATE BILL 17

4.1 May HCC seek a diverse pool of candidates for a job opening?

Yes. Under federal law, HCC must make employment decisions without regard to race, sex, color, national origin, sexual orientation, gender identity, disability, religion, and other protected classifications. Senate Bill 17 states that hiring processes must be “color-blind and sex-neutral” and comply with state and federal anti-discrimination laws. However, neither federal law nor Section 51.3525 prohibits a college from seeking to recruit a diverse pool of candidates by widely disseminating job vacancy notices and engaging in outreach efforts. HCC may send job vacancy notices to a wide variety of publications, Internet job sites, job fairs, and other institutions.

4.2 Does the law prohibit a job posting that requires foreign language proficiency or that requires experience working with low-income students and underserved

student populations?

A job posting may reference language ability or experience working with certain populations if the experience is job-related.

4.3 May interview committees ask candidates about their experience working with low-income students, first-generation students, and students from underserved populations?

An interview committee may ask job-related questions, including questions about the candidate's experience working with low-income students, first-generation students, and students from underserved populations. Questions should be phrased broadly, such as asking about the candidate's experience working with students from different backgrounds. However, if the questions are not related to the position for which the candidate is applying, these types of questions should not be asked.

4.4 May HCC provide training to interview committees and other hiring officials?

Section 51.3525 requires that hiring processes and employment practices be "color-blind and sex-neutral" and comply with state and federal anti-discrimination laws. Numerous state and federal laws address discrimination, including Title VII and Chapter 21 of the Texas Labor Code. To ensure that interview committees and other decision-makers comply with these laws, it is necessary to provide training on the requirements of state and federal anti-discrimination laws. Such training must be presented in a manner that is consistent with Section 51.3525.

+ 4.5 Under what circumstances may HCC consider race, sex, or national origin as a “plus factor” in the hiring process?

Section 51.3525 specifically prohibits giving preference to any applicant based on race, sex, color, or national origin.

+ 4.6 What happens if an employment candidate voluntarily submits a written DEI statement or conveys support for DEI during a job interview?

If a candidate provides an unsolicited DEI statement, the committee or decision-maker may not give preferential treatment to the candidate because of the candidate's support of DEI. Nor may the committee or decision-maker treat the DEI statement as a negative factor.

+ 4.7 May HCC require an employee to perform tasks related to a DEI-related activity, such as requiring a staff member to help coordinate the visit of a guest speaker?

Yes. The law states that HCC may not hire someone for the *purpose* of performing DEI activities (e.g., promoting or providing differential treatment or special benefits to people on the basis of their race, color, or ethnicity). This prohibition is not violated by assigning an employee a task within the scope

of their regular duties. For example, if an employee is responsible for managing audio-visual equipment, the employee must perform this task for any activity at HCC, including one with permissible DEI content, such as a presentation by a guest speaker.

4.8 Will HCC terminate an employee who inadvertently violates Senate Bill 17?

Section 51.3525 requires that each college adopt policies and procedures that provide for discipline and termination of employees and contractors who violate the law. In the event of a suspected violation, HCC will consider the facts and circumstances in deciding whether discipline or dismissal are appropriate. Facts and circumstances would include whether the violation was inadvertent or intentional and whether there were repeated violations. HCC's general practice is to identify performance deficiencies and give employees the opportunity to improve performance and/or behavior." See Policy DLC (Local). However, progressive discipline is not mandatory prior to termination, especially in instances of egregious or serious violations. See DM1 and DM2 (Regulation).

4.9 How will HCC handle complaints about harassment and discrimination that are based on race, color, ethnicity, and sex?

HCC will continue to handle employee and student complaints in accordance with HCC policies and procedures. These policies and procedures implement federal law, including Title VII, Title IX, and Title VI. HCC is obligated to evaluate reported violations and to take reasonable corrective action if a violation is found. Complying with federal law is an exception to Section 51.3525. The statute does not prohibit internal investigations undertaken to

comply with federal law. HCC's Office of Equal Opportunity and Title IX will continue to investigate violations of discrimination and harassment law. See <https://www.hccs.edu/oeotix/>.

5. TRAINING, CONFERENCES, AND CULTURAL ACTIVITIES UNDER SENATE BILL 17

5.1 Does Senate Bill 17 prohibit cultural awareness and historical programs such as Black History Month or Hispanic Heritage Month?

The U.S. Congress and Texas Legislature have a long history of recognizing, commemorating, and celebrating American history. A consensus of institutions has concluded that Section 51.3525 does not prohibit an institution of higher education from participating in official state and federal holidays or recognizing historical events that are culturally significant to the community. And since the effective date of Senate Bill 17, no court or the Texas Attorney General has opined that such activities are prohibited. Such activities, including those sponsored by an academic department, should be designed and implemented with this historical and educational purpose in mind. For example, a panel of faculty presenting historical information would be permissible. No program or activity may promote or provide differential treatment or special benefits based on race, color, or ethnicity. No program may exclude persons based on race, color, ethnicity, or any other covered identity. Activities must be open to all individuals who wish to attend, and attendance may not be compelled.

In addition, Section 51.3525 does not affect the ability of student organizations to sponsor events relating to Black History Month and similar holidays or celebrations, including events that promote DEI. Student organizations are exempt from the DEI restrictions in Section 51.3525.

An academic department may co-sponsor a heritage/cultural activity with a student organization if the activity is designed and implemented as an

educational and historical activity. If the activity promotes DEI or provides differential treatment or special benefits based on race, color, or ethnicity, then an academic department may not co-sponsor the activity with the student organization.

Finally, educational events may feature a guest speaker. Guest speakers are exempt from the DEI-prohibition in Section 51.3525.

+ 5.2 Does the prohibition on DEI training apply to annual equal employment opportunity training or Title IX compliance training?

The prohibition on DEI trainings in Section 51.3525 does not restrict basic equal employment opportunity training and Title IX compliance training that is designed and implemented to educate employees on prohibited acts and reporting procedures relating to discrimination. See, e.g., Texas Labor Code § 21.010 (mandatory training on employment discrimination policies); 40 Texas Admin. Code § 819.24 (subjects of mandatory training, including identification of protected classes under federal law); Texas Educ. Code § 51.282 (requiring a comprehensive prevention and outreach program on sexual harassment, sexual assault, dating violence, and stalking); 34 C.F.R. § 106.45 (2020) (describing Title IX grievance process).

Such training presents factual information to acquaint employees with institutional policies and legal requirements. Such training is informational, rather than ideological, and is not designed or implemented to promote differential treatment or special benefits based on a particular identity or classification.

+ 5.3 May a supervisor or leader use the “guest speaker” exception to provide a mandatory DEI

training?

No. The College may not engage or invite a contractor for the purpose of providing mandatory DEI training whether the training occurs on or off-campus.

+ 5.4 If an employee is found responsible for engaging in racial harassment or other prohibited harassment, may HCC require that the employee attend training on these subjects?

Yes. If HCC's Office of Equal Opportunity & Title IX determines that an employee's conduct has violated a federal anti-discrimination law, HCC must take reasonable corrective action, which in many instances will include completion of a training program to assist the individual in understanding and complying with HCC's policies and legal requirements.

+ 5.5 Does Senate Bill 17 change federal legal protections that prohibit discrimination and harassment on the basis of sexual orientation and gender identity?

Civil Rights Act of 1964 prohibits employment discrimination on the basis of sex, which the Supreme Court has held encompasses sexual orientation and gender identity. Similarly, the U.S. Department of Education has opined that the prohibition on sex discrimination in Title IX includes sexual orientation and gender identity. If HCC's Office of Equal Opportunity & Title IX determines that an individual's conduct has violated these laws, HCC must take reasonable corrective action, which could include assignment of training

to assist the individual in understanding and complying with HCC's policies and legal requirements.

As of July 2024, there is litigation regarding new Title IX regulations that prohibit discrimination on the basis of sexual orientation or gender identity. These regulations are scheduled to take effect on August 1, 2024. In light of this litigation, when training relates to student gender identity or sexual orientation, the department providing the training should consult with the Office of the General Counsel regarding any legal developments that may impact such training.

5.6 May HCC provide faculty workshops, webinars, and professional development programs that contain references to DEI concepts?

Academic course instruction is an exception to Section 51.3525. HCC may acquire library and professional development resources and on-line subscriptions to support the various academic disciplines and the professional development needs of faculty in discharging their academic course instruction responsibilities. These library and professional development materials address a wide range of subjects, which reflects the breadth of HCC's curriculum and HCC's commitment to innovation in teaching methods. Voluntary use of such materials by faculty is permissible even if some of the materials address DEI topics.

Faculty who elect to receive DEI training may not be treated more favorably or less favorably than faculty who do not elect to receive such training.

5.7 May HCC pay the expenses for an employee to attend a conference or luncheon sponsored by an identity-based organization such as an association of

Hispanic educators?

It depends. The prohibitions in Section 51.3525 are not violated by a policy or procedure that allows employees to receive reimbursement in accordance with neutral and non-discriminatory criteria for attendance at professional development and academic conferences. Approval should be based on neutral criteria that do not consider DEI as a factor, and the evaluation should consider the primary purpose of the activity. In addition, attendance at such conferences must be voluntary. Faculty who elect to attend such conferences may not be treated more favorably or less favorably than faculty who do not elect to attend such conferences.

5.8 May HCC sponsor a program that focuses on challenges faced by certain demographic groups?

5.9 May the College allow an external group to rent a campus auditorium to hold a DEI-related conference?

When an institution has policies and procedures that permit rental of college facilities by community or external organizations, the institution does not violate Section 51.3525 by renting a facility in accordance with those policies and procedures. If the institution denies a rental application based on the organization's DEI viewpoint or the identity of its members, such exclusion could violate the First Amendment. If such an event is held, the institution should exercise caution and avoid action that could give the appearance of college sponsorship. In addition, employees may choose to attend the activity but must do so on their own initiative and on their own time.



+ 5.10 May the College pay dues to various chambers and organizations tied to a specific demographic group?

The propriety of an HCC-funded institutional membership will depend on the facts and circumstances, including (i) the nature/mission of the external organization, (ii) whether the organization excludes individuals based on a protected classification, (iii) the reasons for the College's participation and the public purpose to be served, (iv) whether HCC would be permitted to select its individual participants without regard to their race, ethnicity, etc., and (v) whether participants would be required to submit DEI statements. Information about external organizations typically can be found in the organization's mission, bylaws, and programs.

6. MISCELLANEOUS QUESTIONS UNDER SENATE BILL 17

+ 6.1 May a faculty member write a letter of recommendation for a student who is applying for a scholarship, internship, or job with a DEI-related organization?

Yes, so long as the faculty member does not deny requests from students who are applying to non-DEI-related organizations.

+ 6.2 May HCC administer scholarships that are restricted to individuals of a particular race, ethnicity, national origin, or other protected class?

Administering a scholarship that excludes applicants or recipients based on their race, sex, color, ethnicity, or national origin likely will violate Section 51.3525 and also federal law. See *generally* 34 C.F.R. § 100.3(b)(1) and 100.3(b)(2). Scholarships with these types of restrictions should be reviewed by legal counsel to ensure compliance with all applicable laws.

6.3 May a faculty member distribute information on an internship opportunity that is restricted to individuals of a particular race, ethnicity, or national origin?

HCC faculty may not promote internship opportunities that are restricted to students of a particular race, ethnicity, or national origin. Thus, for example, HCC faculty should not distribute a brochure on an exclusionary internship program. However, the law does not prohibit faculty from posting such information in their private capacity on their time using their own technology.

6.4 May HCC post DEI activities on the College website, bulletin boards, or calendar?

Yes, in many circumstances. If a college allows a student organization to have access to college communication sites to promote organizational activities, access must be provided in a neutral and non-discriminatory basis. For example, if a college maintains a calendar of upcoming student organization activities, it may post DEI activities in addition to non-DEI activities on the calendar.

Denying student access to these channels based on viewpoint, race, or other protected class could violate federal law and Section 51.9315(a) of the Texas Education Code. As discussed above, all registered student organizations

are entitled to equal benefits. (See [Section 2.3.](#)) “Benefits” includes channels of communications controlled by the college. Similarly, if an academic department maintains a bulletin board where employees are allowed to post notices of upcoming community events, the college cannot discriminate on the basis of viewpoint, race, or other protected class. The college may impose neutral and reasonable time, place, and manner restrictions on the use of these resources.

+ **6.5 Our department’s webpage includes links to previous program handbooks. Some of the older handbooks reference DEI or programs that we discontinued. Should we pull the old handbooks from the website? Students and faculty sometimes need access to the previous versions.**

The existence of historical or archival material on a college website does not necessarily run afoul of Senate Bill 17. State laws require public institutions to retain certain information in accordance with state records retention schedules. Under these schedules, some information must be permanently preserved, either due to the nature of the material or the fact that the material is historically significant. In some instances, the older material remains useful or is occasionally consulted. Many materials, such as a handbook or press release, contain a date, and it will be evident to a reasonable reader that the material does not reflect a current or active HCC program. Depending on the circumstances, the program may evaluate whether it would be appropriate to mark the material as archived or historical.

Senate Bill 17 Related Statutes, Policies or

Requirements from FAQs

Below are links to Texas Senate Bill 17 (88th Regular Session) and Texas Education Code Section 51.3525 where the bill is codified:

- [Texas Senate Bill 17 \(88th Regular Session\)](#)
- [Texas Education Code Section 51.3525](#)

Below are links to the references to the policies and other authorities cited in the FAQ above (listed alphabetically):

- Bill of Rights (Amendments) to the United States Constitution
 - [First Amendment to the U.S. Constitution](#)
 - [Fourteenth Amendment to the U.S. Constitution](#)
- Civil Rights Act of 1964
 - [Title VI Civil Rights Act of 1964, 42 United States Code Section 2000d et seq.](#)
 - [Title VII Civil Rights Act of 1964 \(as amended\), 42 United States Code Section 2000e et seq.](#)
- Code of Federal Regulations:
 - [2 C.F.R. Section 200.300](#)
 - [2 C.F.R. Appendix II to Part 200](#)
 - [34 C.F.R. Section 100.3](#)
 - [34 C.F.R. Section 106.45](#)
 - [34 C.F.R. Section 75.500](#)
- HCC Board Policy Manual by section:
 - [B: Local Governance](#)
 - BG (LOCAL)
 - [D: Personnel](#)
 - DAA (LOCAL)
 - DF (LOCAL)
 - DGC (LOCAL)
 - DLC (LOCAL)
 - DM1 (REGULATION)
 - DM2 (REGULATION)
 - [E: Instruction](#)
 - EE (LOCAL)
 - EFA (LEGAL)
 - EFAA (LEGAL)
 - [F: Students](#)
 - FA (LOCAL)
 - FAA (LEGAL)

- [FFDA \(LOCAL\)](#)
- [FFDB \(LOCAL\)](#)
- Higher Education Act of 1965, Education Amendments of 1972
 - [Title IX of the Education Amendments of 1972, codified at 20 U.S.C. Sections 1681 et seq.](#)
- Texas Administrative Code
 - [19 Texas Administrative Code Section 4.103](#)
 - [19 Texas Administrative Code Section 4.104](#)
 - [40 Texas Administrative Code Section 819.24](#)
- Texas Constitution
 - [Texas Constitution, Article I, Section 16](#)
- Texas Education Code:
 - [Texas Education Code Section 51.282](#)
 - [Texas Education Code Section 51.9315](#)
 - [Texas Education Code Section 51.9685](#)
- Texas Government Code
 - [Texas Government Code Section 311.022](#)
- Texas Labor Code
 - [Texas Labor Code Section 21.010](#)
- United States Department of Education
 - [EDGAR Regulations](#)

[APPLY TO HCC](#)

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HOUSTON
COMMUNITY COLLEGE

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[House Bill 2504](#)

[Senate Bill 17](#)

[Senate Bill 18](#)

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[Title IX: Sexual Misconduct Information & Reporting](#)

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College Links

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SB 17 Compliance Resources

Houston Community College <txdei.compliance@hccs.edu>

Thu 7/25/2024 10:34 AM



HOUSTON COMMUNITY COLLEGE

Dear HCC Family,

As you may be aware, a new law prohibits HCC and other public colleges from engaging in certain diversity, equity, and inclusion (DEI) activities. To assist employees in complying with these mandatory new requirements, HCC has prepared a webpage with resources. The new law, Senate Bill 17 (SB 17), is located in Texas Education Code Section 51.3525.

Beginning with fiscal year 2024-25, this law requires that Houston Community College annually certify compliance to the Legislature and the Texas Higher Education Coordinating Board before state-appropriated funds may be spent. Compliance is critically important.

HCC has taken important steps to comply with this law. Our Board of Trustees passed updated policies to reflect the requirements of this law in November of 2023 and April 2024. Changes were made to HCC's Strategic Plan in November 2023. Please visit our website for helpful information to guide your compliance actions, including a comprehensive set of Frequently Asked Questions. They can be accessed here:

Senate Bill 17

An individual or department may submit unanswered questions or novel issues for SB 17 compliance assistance and review to HCC's Texas DEI Compliance Oversight Team at txdei.compliance@hccs.edu.

We appreciate your assistance in ensuring HCC's full compliance with this important law.

Sincerely,

Compliance Team
Office of General Counsel



Houston Community College (HCC) is composed of 14 Centers of Excellence and numerous satellite centers that serve the diverse communities in the Greater Houston area by preparing individuals to live and work in an increasingly international and technological society. HCC is one of the country's largest singly-accredited, open-admission, community colleges offering associate degrees, certificates, workforce training, and lifelong learning opportunities. To learn more, visit www.hccs.edu.

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Houston Community College supports, and the College is committed to, providing a learning and working environment that promotes personal integrity, civility, and mutual respect in an environment free of discrimination and harassment on the basis of race, color, religion, sex, gender identity and gender expression, national origin, age, disability, sexual orientation, or veteran status. The following person has been designated to handle inquiries regarding the nondiscrimination policies: Osvaldo Gomez, Director EEO/Compliance, 3100 Main Street, Houston, TX 77002, 713.718.8271. or hcc.oeotix@hccs.edu.



Exhibit B:
HCC's Policy Updates

ACTION ITEM

Meeting Date: November 15, 2023

Consent Agenda

ITEM #	ITEM TITLE	PRESENTER
4.	Proposed Policy BI(LOCAL) DELEGATION OF REPORTING AUTHORITY	Dr. Margaret Ford Fisher E. Ashley Smith Melissa Mihalick Lucie Shipp Tredennick

RECOMMENDATION

Review and approve adoption of Policy BI(LOCAL), delegating authority to the Chancellor or designee to comply with the Senate Bill 17 requirement relating to testimony before a legislative standing committee.

COMPELLING REASON AND BACKGROUND

Senate Bill 17 takes effect January 1, 2024. The bill prohibits initiatives in institutions of higher education that promote diversity, equity and inclusion, with limited exceptions, or except as required to ensure compliance with a court order or state or federal law.

Institutions will be required to testify before the standing committee with primary jurisdiction over higher education at a public hearing of the committee regarding the Board's compliance with SB 17.

The proposed new Policy BI (Local) delegates authority to the Chancellor to carry out the requirements for testimony before the legislative standing committee as required by SB 17.

FISCAL IMPACT

None

LEGAL REQUIREMENT

Senate Bill 17, to be codified as Texas Education Code Section 51.3525

STRATEGIC ALIGNMENT

ATTACHMENTS:

Description	Upload Date	Type
BI(LOCAL) Policy - SB17_Revised	10/27/2023	Attachment
BI(LOCAL) Policy - SB17	10/24/2023	Attachment

This item is applicable to the following: District

DELEGATION OF REPORTING AUTHORITY

BI
(LOCAL)

COMPLIANCE
REPORTING-SB17

The Board delegates to the Chancellor or designee the authority to testify before the appropriate legislative committees regarding compliance with **restrictions related to** diversity, equity and inclusion initiatives under Education Code, Ch. 51, Subchapter G.

DELEGATION OF REPORTING AUTHORITY

BI
(LOCAL)

DEI COMPLIANCE
REPORTING

The Board delegates to the Chancellor or designee the authority to testify before the appropriate legislative committees regarding compliance with diversity, equity and inclusion initiatives under Education Code, Ch. 51, Subchapter G.

ACTION ITEM

Meeting Date: November 15, 2023

Consent Agenda

ITEM #	ITEM TITLE	PRESENTER
8.	Proposed Revisions to Policy BFA(LOCAL) CHIEF EXECUTIVE OFFICER: QUALIFICATIONS AND DUTIES	Dr. Margaret Ford Fisher E. Ashley Smith Melissa Mihalick Lucie Shipp Tredennick

RECOMMENDATION

Review and approve revisions to Policy BFA(LOCAL) as required for compliance with Senate Bill 17.

COMPELLING REASON AND BACKGROUND

Senate Bill 17 takes effect January 1, 2024. The bill prohibits initiatives in institutions of higher education that promote diversity, equity and inclusion, with limited exceptions, and except as required to ensure compliance with a court order or state or federal law.

The bill requires institutions of higher education, including junior colleges, to adopt policies and procedures providing for disciplinary action against employees for violations of SB 17.

The proposed revisions to Policy BFA(LOCAL) removes from the Chancellor's list of duties the promotion and emphasis of "equality" and "diversity."

FISCAL IMPACT

None

LEGAL REQUIREMENT

Senate Bill 17, to be codified as Texas Education Code Section 51.3525

STRATEGIC ALIGNMENT

ATTACHMENTS:

Description	Upload Date	Type
BFA(LOCAL) Policy - SB17	10/24/2023	Attachment

This item is applicable to the following: District

CHIEF EXECUTIVE OFFICER
QUALIFICATIONS AND DUTIES

BFA
(LOCAL)

Delegation

To the extent permitted by law, the Chancellor may delegate responsibilities to other employees of the College District but shall remain accountable to the Board for the performance of all duties, delegated or otherwise.

Duties

The Board employs the Chancellor, who is the chief executive officer of the College District, by a written contract, which shall govern the terms of employment. The Chancellor shall recommend the organizational plan for the College District.

The Chancellor has the authority to hire all at-will personnel. Employees with a written contract shall be employed upon Board approval.

The Chancellor performs all duties relating to the day-to-day operations of the College District, including but not limited to, the following:

1. Developing a qualified administrative organization and providing the College District with academic and fundraising leadership;
2. Preparing the annual budget and submitting it to the Board for approval;
3. Establishing administrative relationships among members of the College District community;
4. Overseeing the content, quality, and effectiveness of the curriculum determined primarily by College District faculty;
5. Appointing Board-reviewed campus committees, as needed, and providing the Board with a semiannual report of the membership of each committee;
6. Preparing the agenda for Board meetings in coordination with the Board Chair and making regular reports to the Board regarding the status of the College District;
7. Promoting College District political effectiveness at the state and local levels;
8. Supervising the development and implementation of a system to evaluate faculty and staff;
9. In coordination with Board Counsel and the College District's General Counsel, assisting the Board in policy development, its yearly self-assessment, and meeting its own training requirements;
10. Forging a relationship of mutual respect with each Board member;

CHIEF EXECUTIVE OFFICER
QUALIFICATIONS AND DUTIES

BFA
(LOCAL)

11. Understanding each college of the College District and its educational needs;
12. Enforcing fiduciary and academic accountability of the College District to the general public;
13. Promoting College District unity at all levels, emphasizing ~~equality, diversity, and~~ respect for all individuals;
14. Interpreting the College District to the community;
15. Providing the Board members with important information before all others and having background information and research compiled on issues of particular importance to the Board, with sufficient time for study by Board members before a vote;
16. Serving as the official spokesperson for the College District;
17. Maintaining open channels of communication throughout the College District;
18. Handling employee disciplinary issues, including termination when appropriate;
19. In the event of a catastrophe, emergency, or natural disaster affecting the College District, contracting for the replacement, construction, or repair of College District equipment or facilities if emergency replacement, construction, or repair is necessary for the health and safety of College District students and staff; and
20. Enhancing the image and well-being of the College District.

Effective Date

~~This policy shall be effective as of the adoption date, December 14, 2022.~~

ACTION ITEM

Meeting Date: November 15, 2023

Consent Agenda

ITEM #	ITEM TITLE	PRESENTER
5.	Proposed Policy CFE(LOCAL) PURCHASING AND ACQUISITION - VENDOR RELATIONS	Dr. Margaret Ford Fisher E. Ashley Smith Melissa Mihalick Lucie Shipp Tredennick

RECOMMENDATION

Review and approve adoption of Policy CFE(LOCAL) as required for compliance with Senate Bill 17.

COMPELLING REASON AND BACKGROUND

Senate Bill 17 takes effect January 1, 2024. The bill restricts initiatives in institutions of higher education that promote diversity, equity and inclusion, with limited exceptions, and except as required to ensure compliance with a court order or state or federal law.

The bill requires institutions of higher education, including junior colleges, to adopt policies and procedures providing for disciplinary action against contractors for violations of the legislative prohibitions.

The proposed new Policy CFE(LOCAL) clarifies the actions of contractors that are prohibited by SB 17.

FISCAL IMPACT

None

LEGAL REQUIREMENT

Senate Bill 17, to be codified as Texas Education Code Section 51.3525

STRATEGIC ALIGNMENT

ATTACHMENTS:

Description	Upload Date	Type
CFE(LOCAL) Policy - SB17_Revised	10/27/2023	Attachment
CFE(LOCAL) Policy - SB17	10/24/2023	Attachment

This item is applicable to the following: District

**VENDOR
LIMITATIONS-
SB17**

While performing services under a contract with HCC, no contractor shall, except as required by law, engage in conduct on behalf of the College that:

1. Is intended to promote diversity, equity, and inclusion in connection with any function of HCC;
2. Includes hiring or assigning an employee or third party contractor to perform services intended to promote diversity, equity, and inclusion in connection with any function of HCC;
3. Compels, requires, induces, or solicits any person to provide a diversity, equity and inclusion statement as a condition to performing services for HCC;
4. Gives preferential treatment to a person performing services for HCC based on the person's provision of a diversity, equity, and inclusion statement;
5. Gives preference on the basis of race, sex, color, ethnicity, or national origin to an applicant or an employee that will perform services for HCC; or
6. Requires participation in a diversity, equity, and inclusion training as a condition of performing services for HCC.

VENDOR DEI
LIMITATIONS

While performing services under a contract with HCC, no contractor shall, except as required by law, engage in conduct on behalf of the College that:

1. Is intended to promote diversity, equity, and inclusion in connection with any function of HCC;
2. Includes hiring or assigning an employee or third party contractor to perform services intended to promote diversity, equity, and inclusion in connection with any function of HCC;
3. Compels, requires, induces, or solicits any person to provide a diversity, equity and inclusion statement as a condition to performing services for HCC;
4. Gives preferential treatment to a person performing services for HCC based on the person's provision of a diversity, equity, and inclusion statement;
5. Gives preference on the basis of race, sex, color, ethnicity, or national origin to an applicant or an employee that will perform services for HCC; or
6. Requires participation in a diversity, equity, and inclusion training as a condition of performing services for HCC.

ACTION ITEM

Meeting Date: November 15, 2023

Consent Agenda

ITEM #	ITEM TITLE	PRESENTER
6.	Proposed Revisions to Policy DAA(LOCAL) EMPLOYMENT OBJECTIVES: EQUAL EMPLOYMENT OPPORTUNITY	Dr. Margaret Ford Fisher E. Ashley Smith Melissa Mihalick Lucie Shipp Tredennick

RECOMMENDATION

Review and approve revisions to Policy DAA(LOCAL) as required for compliance with Senate Bill 17.

COMPELLING REASON AND BACKGROUND

Senate Bill 17 takes effect January 1, 2024. The bill restricts initiatives in institutions of higher education that promote diversity, equity and inclusion, with limited exceptions, and except as required to ensure compliance with a court order or state or federal law.

The bill requires institutions of higher education, including junior colleges, to adopt policies and procedures providing for disciplinary action against employees for violations of SB 17.

The proposed revisions to Policy DAA(LOCAL) clarifies the actions of employees that are prohibited by SB 17 and provides for the application of the College's existing policies and procedures for disciplinary actions for conduct in violation of SB 17. The revisions also remove existing language related to diversity, equity and inclusion.

FISCAL IMPACT

None

LEGAL REQUIREMENT

Senate Bill 17, to be codified as Texas Education Code Section 51.3525

STRATEGIC ALIGNMENT

ATTACHMENTS:

Description	Upload Date	Type
DAA(LOCAL) Policy - SB17	10/24/2023	Attachment

This item is applicable to the following: District

**Equal Employment
Opportunity**

The Board is committed to ensuring that the College District's employment standards, procedures, and practices are applied in a manner that provides equal opportunities without regard to race, color, religion, sex, gender identity and gender expression, national origin, age, disability, sexual orientation, or veteran status.

The Board values its employees and their contributions, promotes opportunities for their professional growth and development, and provides a positive working and learning environment that encourages ~~diversity~~, innovation and creativity, ~~and inclusion~~.

Prohibited Diversity,
Equity and Inclusion
Actions

No employee shall, except as required by law, engage in conduct that:

1. Establishes or maintains a diversity, equity, and inclusion office;
2. Hires or assigns an employee or third party contractor to perform the duties of a diversity, equity, and inclusion office;
3. Compels, requires, induces, or solicits any person to provide a diversity, equity and inclusion statement;
4. Gives preferential treatment to a person based on the person's provision of a diversity, equity, and inclusion statement;
5. Gives preference on the basis of race, sex, color, ethnicity, or national origin to an applicant for employment, an employee, or a participant in a college function; or
6. Requires participation in a diversity, equity, and inclusion training as a condition of enrollment or performance of any College function.

ACTION ITEM

Meeting Date: November 15, 2023

Consent Agenda

ITEM #	ITEM TITLE	PRESENTER
7.	Proposed Revisions to Policy FA(LOCAL) EQUAL EDUCATIONAL OPPORTUNITY	Dr. Margaret Ford Fisher E. Ashley Smith Melissa Mihalick Lucie Shipp Tredennick

RECOMMENDATION

Review and approve revisions to Policy FA(LOCAL) as required for compliance with Senate Bill 17.

COMPELLING REASON AND BACKGROUND

Senate Bill 17 takes effect January 1, 2024. The bill restricts initiatives in institutions of higher education that promote diversity, equity and inclusion, with limited exceptions, and except as required to ensure compliance with a court order or state or federal law.

The bill prohibits the College from requiring a student to provide a diversity, equity, and inclusion statement or participate in diversity, equity, and inclusion training. The proposed revision to Policy FA(LOCAL) clarifies this prohibition.

FISCAL IMPACT

None

LEGAL REQUIREMENT

Senate Bill 17, to be codified as Texas Education Code Section 51.3525

STRATEGIC ALIGNMENT

ATTACHMENTS:

Description	Upload Date	Type
FA(LOCAL) Policy - SB17	10/24/2023	Attachment

This item is applicable to the following: District

The College District is committed to providing an educational climate that is conducive to the personal and professional development of each individual. The College District does not discriminate and prohibits discrimination on the basis of race, color, religion, gender identity and gender expression, national origin, age, disability, sex, sexual orientation, or veteran status in employment or the rights, privileges, programs, and activities generally accorded or made available to students at the school, administration of its educational policies, admissions policies, scholarship and loan programs, and athletic and other school-administered programs. A lack of English language skills shall not be a barrier to admission and participation in College District programs. To ensure compliance with Title IX and other federal and state civil rights laws, the College District has developed policies and procedures that prohibit discrimination in all of its forms.

[No student shall be required to provide a diversity, equity, and inclusion statement or be required to participate in diversity, equity, and inclusion training, except as required by law.](#)

The College District is committed to cultivating an environment free from inappropriate conduct of a sexual or gender-based nature including sex discrimination, sexual assault, sexual harassment, and sexual violence. Sex discrimination includes all forms of sexual and gender-based misconduct and violates an individual's fundamental rights and personal dignity.

All inquiries regarding compliance with Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 or other civil rights laws should be directed to the following individual:

Name: David Cross
Position: Director EEO/Compliance, Title IX
Coordinator/Section 504 Coordinator
Office: Office of Institutional Equity
Address: 3100 Main Street, Suite 702, Houston, TX 77002
Telephone: (713) 718-8271
Email: institutional.equity@hccs.edu

Effective Date

~~This policy shall be effective as of the adoption date, April 3, 2019.~~

ACTION ITEM

Meeting Date: April 17, 2024

Consent-Board Governance

ITEM #	ITEM TITLE	PRESENTER
13.	TASB Update 46 - New and Revised Recommended Local Policies Address Senate Bill 17	Dr. Margaret Ford Fisher E. Ashley Smith Melissa Mihalick Lucie Shipp Tredennick

RECOMMENDATION

Approve proposed revisions to these attached policies, with the recommended changes.

COMPELLING REASON AND BACKGROUND

SB 17 prohibits Diversity, Equity, and Inclusion (DEI) offices and initiatives at colleges, with limited exceptions. The majority of the bill takes effect on January 1, 2024. The portion of the bill that requires colleges to submit to the legislature and THECB a report certifying the governing board's compliance with the bill's provisions during the proceeding state fiscal year prior to spending appropriated funds during the current fiscal year, applies to funds appropriated for the fiscal year beginning September 1, 2024.

Under TASB Update 46 guidelines, these new and/or revision recommended local policies addresses SB 17, which prohibits a Diversity, Equity, and Inclusion Office at a college, with limited exceptions:

- BG(LOCAL) - new
- CFE(LOCAL)
- DAA(LOCAL)
- FA(LOCAL)

These suggested policy revisions reconcile policies adopted by HCC's Board of Trustees on November 15, 2023, with newly available standardized language recommended by TASB.

FISCAL IMPACT

n/a

STRATEGIC ALIGNMENT

5. College of Choice

ATTACHMENTS:

Description	Upload Date	Type
BG(LOCAL) Policy - New	3/6/2024	Attachment
CFE(LOCAL) Policy	3/6/2024	Attachment

DAA(LOCAL) Policy
FA(LOCAL) Policy

3/6/2024
3/19/2024

Attachment
Attachment

This item is applicable to the following: District

Note: For related information on diversity, equity, and inclusion initiatives, see CFE for contractor discipline, DAA for employees, DH for employee discipline, and FA for students.

**Diversity, Equity,
and Inclusion Office**

Except as required by federal law, the College District shall not:

1. Establish or maintain a diversity, equity, and inclusion office; or
2. Hire or assign an employee or contract with a third party to perform the duties of a diversity, equity, and inclusion office.

"Diversity, equity, and inclusion office" means an office, division, or other unit of the College District established for the purpose of:

1. Influencing hiring or employment practices at the College District with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring processes in accordance with any applicable state and federal antidiscrimination laws;
2. Promoting differential treatment of or providing special benefits to individuals on the basis of race, color, or ethnicity;
3. Promoting policies or procedures designed or implemented in reference to race, color, or ethnicity, other than policies or procedures approved in writing by the College District's general counsel and the Coordinating Board for the sole purpose of ensuring compliance with any applicable court order or state or federal law; or
4. Conducting trainings, programs, or activities designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation, other than trainings, programs, or activities developed by an attorney and approved in writing by the College District's general counsel and the Coordinating Board for the sole purpose of ensuring compliance with any applicable court order or state or federal law.

Exceptions

Nothing in this section may be construed to limit or prohibit the College District or a College District employee from, for purposes of applying for a grant or complying with the terms of accreditation by an accrediting agency, submitting to the grantor or accrediting agency a statement that:

1. Highlights the College District's work in supporting first-generation college students, low-income students, or underserved student populations; or

Commented [JL1]: This new policy recommended by TASB, and the Administration and Board Counsel are in concurrence.

Houston Community College
101506

ADMINISTRATIVE ORGANIZATION

BG
(LOCAL)

2. Certifies compliance with state and federal antidiscrimination laws.

The prohibitions do not apply to:

1. Academic course instruction;
2. Scholarly research or a creative work by College District employees or students;
3. An activity of a student organization registered with or recognized by the College District;
4. Guest speakers or performers on short-term engagements;
5. A policy, practice, procedure, program, or activity to enhance student academic achievement or postgraduate outcomes that is designed and implemented without regard to race, sex, color, or ethnicity;
6. Data collection; or
7. Student recruitment or admissions.

**VENDOR
LIMITATIONS –
SB 17**

While performing services under a contract with HCC, no contractor shall, except as required by law, engage in conduct on behalf of the College that:

1. Is intended to promote diversity, equity, and inclusion in connection with any function of HCC;
2. Includes hiring or assigning an employee or third party contractor to perform services intended to promote diversity, equity, and inclusion in connection with any function of HCC;
3. Compels, requires, induces, or solicits any person to provide a diversity, equity and inclusion statement as a condition to performing services for HCC;
4. Gives preferential treatment to a person performing services for HCC based on the person's provision of a diversity, equity, and inclusion statement;
5. Gives preference on the basis of race, sex, color, ethnicity, or national origin to an applicant or an employee that will perform services for HCC; or
6. Requires participation in a diversity, equity, and inclusion training as a condition of performing services for HCC.

Diversity, Equity,
and Inclusion
Initiatives

The Chancellor or designee shall develop procedures addressing the discipline, up to and including termination, of a College District contractor who violates Education Code 51.3525(b)(1). [See BG, DAA, and FA]

Commented [JL1]: This addition is recommended by TASB, and the Administration and Board Counsel are in concurrence.

Equal Employment Opportunity

The Board is committed to ensuring that the College District's employment standards, procedures, and practices are applied in a manner that provides equal opportunities without regard to race, color, religion, sex, gender identity and gender expression, national origin, age, disability, sexual orientation, or veteran status.

The Board values its employees and their contributions, promotes opportunities for their professional growth and development, and provides a positive working and learning environment that encourages ~~diversity involvement~~, innovation and creativity, ~~and inclusion~~.

Note: For complaints of discrimination, harassment, and retaliation targeting employees on the basis of a protected characteristic, see DAAA and DIAB.

Diversity, Equity, and Inclusion Initiatives

Except as required by federal law, the College District shall not:

1. Compel, require, induce, or solicit any person to provide a diversity, equity, and inclusion statement or give preferential consideration to any person based on the provision of a diversity, equity, and inclusion statement;
2. Give preference on the basis of race, sex, color, ethnicity, or national origin to a participant in any College District function; or
3. Require as a condition of enrolling at the College District or performing any College District function any person to participate in diversity, equity, and inclusion training that references race, color, ethnicity, gender identity, or sexual orientation, unless it was developed by an attorney and approved in writing by the College District's general counsel and the Coordinating Board for the sole purpose of ensuring compliance with any applicable court order or state or federal law.

Exceptions

Nothing in this section may be construed to limit or prohibit the College District or a College District employee from, for purposes of applying for a grant or complying with the terms of accreditation by an accrediting agency, submitting to the grantor or accrediting agency a statement that:

1. Highlights the College District's work in supporting first-generation college students, low-income students, or underserved student populations; or
2. Certifies compliance with state and federal antidiscrimination laws.

Commented [JL1]: Revisions are made by the Administration, and TASB and Board Council are in concurrence.

Commented [JL2]: The additions are recommended by TASB, and the Administration and Board Council are in concurrence.

EMPLOYMENT OBJECTIVES
EQUAL EMPLOYMENT OPPORTUNITY

DAA
(LOCAL)

The prohibitions do not apply to:

1. Submitting a statement as part of a grant application or to comply with the terms of accreditation that highlights the College District's work in supporting first-generation college students, low-income students, or underserved student populations, or that certifies compliance with state and federal antidiscrimination laws;
2. Academic course instruction;
3. Scholarly research or a creative work by College District employees or students;
4. An activity of a student organization registered with or recognized by the College District;
5. Guest speakers or performers on short-term engagements;
6. A policy, practice, procedure, program, or activity to enhance student academic achievement or postgraduate outcomes that is designed and implemented without regard to race, sex, color, or ethnicity;
7. Data collection; or
8. Student recruitment or admissions.

Note: For related information on diversity, equity, and inclusion initiatives, see BG for diversity, equity, and inclusion offices, CFE for contractor discipline, DH for employee discipline, and FA for students.

EQUAL EDUCATIONAL OPPORTUNITY

FA
(LOCAL)

The College District is committed to providing an educational climate that is conducive to the personal and professional development of each individual. The College District does not discriminate and prohibits discrimination on the basis of race, color, religion, gender identity and gender expression, national origin, age, disability, sex, sexual orientation, or veteran status in employment or the rights, privileges, programs, and activities generally accorded or made available to students at the school, administration of its educational policies, admissions policies, scholarship and loan programs, and athletic and other school-administered programs. A lack of English language skills shall not be a barrier to admission and participation in College District programs. To ensure compliance with Title IX and other federal and state civil rights laws, the College District has developed policies and procedures that prohibit discrimination in all of its forms.

The College District is committed to cultivating an environment free from inappropriate conduct of a sexual or gender-based nature including sex discrimination, sexual assault, sexual harassment, and sexual violence. Sex discrimination includes all forms of sexual and gender-based misconduct and violates an individual's fundamental rights and personal dignity.

All inquiries regarding compliance with Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 or other civil rights laws should be directed to the following individual:

Name:	David Cross Osvaldo Gomez, MSW
Position:	Director of EEO and Compliance , Title IX Coordinator/ Section 504 Coordinator
Office:	The Office of Institutional Equity Equal Opportunity and Title IX
Address:	3100 Main Street, Suite 7002, Houston, TX 77002
Telephone:	(713) 718-8271
Email:	institutional.equity@hccs.edu hcc.oetix@hccs.edu

Commented [JL1]: Revisions are made by the Administration, and the Board Counsel is in concurrence.

Effective Date

~~This policy shall be effective as of the adoption date, April 3, 2019.~~ [Note: For complaints of discrimination, harassment, and retaliation on the basis of a protected characteristic, see FFDA and FFDB.](#)

Commented [I2]: Remaining additions/revisions are recommended by TASB, and the Administration and Board Counsel are in concurrence.

Diversity, Equity,
and Inclusion
Initiatives

Except as required by federal law, the College District shall not:

1. Compel, require, induce, or solicit any person to provide a diversity, equity, and inclusion statement or give preferential consideration to any person based on the provision of a diversity, equity, and inclusion statement;
2. Give preference on the basis of race, sex, color, ethnicity, or national origin to a participant in any College District function; or
3. Require as a condition of enrolling at the College District or performing any College District function any person to participate in diversity, equity, and inclusion training that references race, color, ethnicity, gender identity, or sexual orientation, unless it was developed by an attorney and approved in writing by the College District's general counsel and the Coordinating Board for the sole purpose of ensuring compliance with any applicable court order or state or federal law.

Exceptions

The prohibitions do not apply to:

1. Academic course instruction;
2. Scholarly research or a creative work by College District employees or students;
3. An activity of a student organization registered with or recognized by the College District;
4. Guest speakers or performers on short-term engagements;
5. A policy, practice, procedure, program, or activity to enhance student academic achievement or postgraduate outcomes that is designed and implemented without regard to race, sex, color, or ethnicity;
6. Data collection; or
7. Student recruitment or admissions.

Note: For related information on diversity, equity, and inclusion initiatives, see BG for diversity, equity, and inclusion offices, CFE for contractor discipline, DAA for employees, and DH for employee discipline.



Exhibit C:
HCC's Strategic Plan Updates

ACTION ITEM

Meeting Date: November 15, 2023

Consent Agenda

ITEM #	ITEM TITLE	PRESENTER
9.	Proposed Changes to Strategic Plan: Embracing Houston's Future	Dr. Margaret Ford Fisher Dr. Remmele Young Dr. Andrea Burridge Dr. Melissa Miller-Waters Debra Esterak; Rogers, Morris, & Grover, LLP

RECOMMENDATION

Approve proposed changes to Strategic Plan: Embracing Houston's Future.

COMPELLING REASON AND BACKGROUND

- In December of 2019, the Board of Trustees approved Embracing Houston's Future as its strategic framework. Embracing Houston's Future is deemed a culture framework in service of six HCC strategic priorities: (1) Student Success, (2) Diversity and Equity, (3) Personalized Learning, (4) Academic Rigor, (5) Community Investment, and (6) College of Choice.
- During the 88th Texas Legislative Session, SB 17 relating to diversity, equity, and inclusion (DEI) initiatives at public institutions of higher education (IHE) became law. Notably, SB 17 restricts initiatives in IHEs that promote diversity, equity, and inclusion, with limited exceptions. The effective date of SB 17 is January 1, 2024.
- On August 16, 2023, with the intent of ensuring compliance with SB 17, the Committee of the Whole considered proposed changes to the HCC Strategic Plan. The item was advanced to the full board for consideration and subsequently pulled from the consent agenda, allowing a reasonable time to further examine the law for action by the Board of Trustees.
- After thorough examination of this consideration, the item comes to the Committee of the Whole with substantive changes to ensure timely compliance with the SB 17. The proposal here is to remove Section E.1.1.2 (i.e., "Diversity and Equity") from HCC's strategic priorities found in Embracing Houston's Future, as well as other DEI references throughout the Strategic Plan.

FISCAL IMPACT

None.

LEGAL REQUIREMENT

None.

STRATEGIC ALIGNMENT

6. *College of Choice*

ATTACHMENTS:

Description	Upload Date	Type
Strategic Plan Update - Redlined	11/8/2023	Attachment

This item is applicable to the following: District

A copy of HCC's current Strategic Plan can be found at the following link:

<https://www.hccs.edu/departments/planning--institutional-effectiveness/strategic-plan/>

REPORT ITEM

Meeting Date: April 3, 2024

Topics For Discussion and/or Action:

ITEM #	ITEM TITLE	PRESENTER
D.	Update of the Strategic Plan	Dr. Margaret Ford Fisher Dr. Andrea BurrIDGE

DISCUSSION

Provide an update of the HCC's Strategic Plan "Embracing Houston's Future" to include an overview of the streamlined version of the plan for future use and distribution.

COMPELLING REASON AND BACKGROUND

In November of 2020, the Board of Trustees updated Embracing Houston's Future as its strategic framework. Embracing Houston's Future is deemed a culture framework in service of five HCC strategic priorities: (1) Student Success, (2) Personalized Learning, (3) Academic Rigor, (4) Community Investment, and (5) College of Choice.

Embracing Houston's Future, HCC's Strategic Plan, was updated to be compliant with SB 17 in November, 2023. This item introduces a streamlined Strategic Plan for future use and distribution.

FISCAL IMPACT

NA

LEGAL REQUIREMENT

NA

STRATEGIC ALIGNMENT

1. Student Success, 2. Personalized Learning, 3. Academic Rigor, 4. Community Investment, 5. College of Choice

ATTACHMENTS:

Description	Upload Date	Type
Strategic Plan Presentation	3/26/2024	Presentation
Embracing Houston's Future (Condensed Strategic Plan)	3/26/2024	Attachment

This item is applicable to the following:

Central, Coleman, Northeast, Northwest, Southeast, Southwest, District, Online



Strategic Planning Update

Margaret Ford Fisher, Ed.D.
Chancellor

Andrea Burrige, Ph.D.
Interim Vice Chancellor, Strategy, Planning, and Institutional Effectiveness

03/25/2024

Summary of Condensed Strategic Plan Document

- Focused on HCC's Mission, Vision, Values, and Strategic Priorities
- Compliant SACSCOC accreditation and with SB 17
- Provides a basis for ongoing work designed to focus the college on student success and student outcomes.



Questions?

EMBRACING HOUSTON'S FUTURE

A COMPREHENSIVE STRATEGY



Real World
Education



HCC Chancellor Letter

Insert Chancellor Letter Here



Margaret Ford Fisher

Margaret Ford Fisher, Ed.D.
Chancellor
Houston Community College

2024 Board of Trustees



Cynthia Lenton-Gary, Ph.D.
DISTRICT VII
Chair



Laolu Davies-Yemitan
DISTRICT IV
Vice Chair



David Wilson
DISTRICT VI
Secretary



Monica Flores Richart
DISTRICT I



Charlene Ward Johnson
DISTRICT II



Adriana Tamez, Ed.D.
DISTRICT III



Sean Cheben
DISTRICT V



Eva L. Lored
DISTRICT VIII



Pretta VanDible
Stallworth, Ph.D., PMP
DISTRICT IX

HCC Board Chair Letter

Insert Board Chair Letter Here



Sincerely,

A handwritten signature in black ink, appearing to read "Cynthia Lenton-Gary".

Cynthia Lenton-Gary, Ph.D.
HCC Board of Trustees
District VII

Mission, Vision, and Values





About the HCC Mission, Vision, and Values

Established for more than a decade, the Mission of HCC remains steadfast. However, the landscape in which HCC operates has evolved significantly. The Greater Houston community it serves has become exceptionally diverse, surpassing even national standards. The dynamics of the workforce have shifted towards serial employment, placing greater emphasis on individual economic security. Younger generations now seek a different work-life balance, prompting the need for continuous learning and training throughout one's life.

In response to these dynamic circumstances, the approaches necessary to fulfill HCC's Mission have undergone significant changes. While the Mission remains constant, the College recognizes the imperative to adapt and innovate in delivering the highest quality education. Technological advancements in teaching and learning have become integral, necessitating an innovative mindset.

Given the fierce competition for the attention of potential students, HCC recognizes the need to play a leadership role in driving change. The College must not only respond to the community's needs but also spearhead initiatives to ensure an educated, productive, and fulfilled workforce, contributing to the vibrant economy that secures the future of the Greater Houston region.

This evolution is reflected in a Vision that has been revised to align with the demands of the times. HCC sees itself not only as a responsive institution but as a proactive force shaping the educational landscape.

The Values emphasize HCC's unwavering commitment to collaboration, both internally and with the external world. Devotion to service and the empowerment of individuals are considered essential to the institution's success. HCC's passion for learning and commitment to driving innovation underline its recognition that learning is no longer a singular moment but a perpetual practice in the modern world. These Values constitute the expectations for faculty and staff, essential to realizing HCC's Vision and fulfilling its Mission.

In essence, HCC's Values have not changed at their core; they have evolved to better respond to a changing world, seizing opportunities, and transforming both the institution and the community it serves.

Mission

The HCC Mission

The College District is an open-admission, public institution of higher education offering a high-quality, affordable education for academic advancement, workforce training, career development, and lifelong learning to prepare individuals in our diverse communities for life and work in a global and technological society.



Vision

The HCC Vision

Houston Community College will deliver relevant, high-quality education and training, ensuring success for all students, our community, economy and beyond.



WE LEAD WITH OUR SHARED VALUES

MOSAIC & ME

Commitment to Collaborate. HCC works best when faculty and staff collaborate with each other, students, community, and all whom the College serves. The open sharing of resources, ideas, skills, and knowledge from diverse perspectives working towards common goals and solutions help to generate synergy to achieve HCC's goals. Those who work at HCC value differences in each other, recognizing those distinctions as assets that when brought together create better outcomes.

Devotion to Service. HCC faculty and staff subscribe to an unwavering commitment to serve students and community. Their willingness to adopt a "serve others first" mentality and approach to their work enables them to live up to and surpass the expectations of their constituents and each other. By putting service first, HCC ensures the best experience for those who choose to be part of HCC and those who the College serves.

Empower to Trust. HCC encourages and actively empowers trust individually and collectively as faculty and staff work to serve students, community, and each other. Empowering themselves and others to trust each other's motives, work, and integrity, they are able to encourage and

sustain an environment where students can most effectively learn, faculty can teach, and employees can thrive.

Passion to Learn. HCC as an institution believes in life-long learning, where faculty and staff are committed to the continuous pursuit of learning in all that they do. There is an inherent passion for teaching and connecting ideas, lessons, and concepts with other classrooms, colleges, and offices. HCC faculty and staff embrace and promote the never-ending pursuit of learning and bettering of themselves, their colleagues, and those they serve.

Drive to Innovate. HCC actively encourages intentional innovation and purposeful evolution to anticipate the changing needs of students, their current and future employers, and the Greater Houston community. In such an environment, innovation becomes an internalized way of thinking and affecting change. HCC faculty and staff commit themselves to understanding the here and now as well as the nascent trends that they must address. They also understand and accept that innovation does not always succeed; a willingness to embrace the new must be balanced with a prudent assessment of risk and reward.

The Comprehensive Strategy is poised to achieve HCC's 2030 vision through the following key actions:

- ▶ Sustaining an unwavering commitment to HCC's Mission.
- ▶ Achieving the Mission and Vision by steadfastly upholding the core values.
- ▶ Prioritizing strategic focus on Student Success, Personalized Learning, Academic Rigor, Community Investment, and becoming the College of Choice.
- ▶ Monitoring and addressing Key Performance Indicators to ensure progress.
- ▶ Expanding on the knowledge gained through practical experience.
- ▶ Reinforcing HCC's dedication to the transformative progress.



Strategic Priorities

HCC's Five Strategic Priorities

Five Strategic Priorities emerged from the work of the Strategic Planning Team and the Board of Trustees. The Priorities guide the direction of the Houston Community College System. For each Strategic Priority, Goals and Areas of Focus were identified to further that priority. Key Performance Indicators will be identified to monitor progress annually towards the Strategic Priorities as the plan is implemented.

Priority 1: Student Success

Strategic Goal

To build and sustain the ultimate student experience--a personalized experience that helps students discover and identify a path to achieve their goals, ensures relevant student learning through interactive and engaging instruction, and provides support along the way--where success is measured by demonstrated readiness for career placement, workforce entry, and/or college transfer.

Areas of Focus

- ▶ 1.1 Enhance Academic and Workforce Educational Pathways
- ▶ 1.2 Extend the quality and reach of community education programs (including adult and continuing education)
- ▶ 1.3 Develop and Implement a Quality Enhancement Plan
- ▶ 1.4 Support the success of HCC's International Student Population
- ▶ 1.5 Enhance the quality of our Remote Learning Modalities

Priority 2: Personalized Learning

Strategic Goal

To provide customized instruction and assessments that support student success by understanding the students' unique needs, preferences, concerns, and aspirations. Personalized learning is student-directed, student-paced, and designed for each learner.

Areas of Focus

- ▶ 2.1 Recognize that students enter HCC at different life-stages with varying goals, and incorporate this reality into institutional decision-making
- ▶ 2.2 Integrate understanding of students' unique needs, preferences, concerns, and aspirations into student advising and teaching and learning strategies
- ▶ 2.3 Develop data collection capabilities that support the integration of the "student experience" into institutional decision-making practices

Priority 3: Academic Rigor

Strategic Goal

To establish a set of common, high-quality curricular and instructional standards that continually challenge all students to demonstrate achievement of proficiencies throughout their academic journey with HCC.

Initial Areas of Focus

- ▶ **3.1 Develop a vision for teaching and learning and student support in the new normal in a postpandemic educational environment**
- ▶ **3.2 Enhance the use of learning outcomes assessment data to enhance program quality**
- ▶ **3.3 Strengthen the role and influence of workforce program industry advisory committees to ensure alignment with industry need**
- ▶ **3.4 Develop plans to maximize the utilization of instructional facilities in support of program expansion and teaching and learning excellence**
- ▶ **3.5 Expand the use of co-requisite remediation teaching models in order to improve student preparedness to be successful in college-level work**



Priority 4: Community Investment

Strategic Goal

To serve as an economic engine for the Greater Houston Region by creating equitable access and opportunity that leverages the collective resources of the College to support student success by partnering with key constituents to ensure the creation of economic development opportunities in all of our local communities.

Initial Areas of Focus

- ▶ 4.1 Enhance partnership in support of K-12 educational pathway development
- ▶ 4.2 Partner with community leaders across greater Houston to identify community education programs (including adult and continuing education) needs and distribution gaps
- ▶ 4.3 Expand our collaboration with leaders of regional colleges and universities for enhanced pathways for student success
- ▶ 4.4 Expand our collaboration with industry for enhanced pathways for student success
- ▶ 4.5 Expand our collaboration with legislative leaders and civic leaders for enhanced pathways for student success
- ▶ 4.6 Strengthen outreach and engagement efforts to local communities across greater Houston in order to align program offerings with local community needs

Priority 5: College of Choice

Strategic Goal

Advancing HCC as the model for the next generation of community colleges by setting the standard for quality and value in higher education; leading innovation of programs, industry partnerships and economic opportunities; and serving as a preeminent choice for students and employees.

Areas of Focus

- ▶ 5.1 Enhance administrative succession planning to build a sustainable workforce
- ▶ 5.2 Develop a sustainable budget that supports a communications and marketing strategy that ensures we are seen as the college of choice



Accreditation Compliance (SACSCOC)

Houston Community College is accredited by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) to award associate and baccalaureate degrees. Houston Community College also may offer credentials such as certificates and diplomas at approved degree levels. Questions about the accreditation of Houston Community College may be directed in writing to the Southern Association of Colleges and Schools Commission on Colleges at 1866 Southern Lane, Decatur, GA 30033-4097, by calling (404) 679-4500, or by using information available on SACSCOC's website www.sacscoc.org.

The Houston Community College District was first admitted into membership in SACS on December 19, 1977. Accreditation was granted provisionally and yearly for five years until a full Self-Study was completed and reaffirmation of accreditation was received for the ten years following December 17, 1982. HCC received its last reaffirmation of accreditation in June 2022 with no recommendations. HCC's next reaffirmation will take place in 2032, and the institution's Fifth-Year Interim Report is due in 2027.

hccs.edu/accreditation

**Houston Community College
Board of Trustees**

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• • •

Chancellor

Margaret Ford Fisher, Ed.D.

HOUSTON
COMMUNITY COLLEGE



Exhibit D:

HCC's Senate Bill 17

Compliance Attestation Letters



December 12, 2023

Samantha Manjarrez
Chief Facilities Officer
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Ms. Manjarrez:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest conveniences, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>SGM</i>	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
<i>SGM</i>	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.

<i>SGM</i>	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
<i>SGM</i>	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>SGM</i>	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
<i>SGM</i>	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
<i>SGM</i>	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
<i>SGM</i>	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
<i>SGM</i>	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>SGM</i>	1) Identified all employees, regardless of official title, who perform DEI duties.
<i>SGM</i>	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
<i>SGM</i>	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
<i>SGM</i>	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
<i>SGM</i>	5) Updated organizational charts, webpages, and program descriptions as may be needed.
<i>SGM</i>	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not	

<p>otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>SGM</i></p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p><i>SGM</i></p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p><i>SGM</i></p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p><i>SGM</i></p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>SGM</i></p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p><i>SGM</i></p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p><i>SGM</i></p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>

<i>SGM</i>	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
<i>SGM</i>	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
<i>SGM</i>	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
<i>SGM</i>	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>SGM</i>	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
<i>SGM</i>	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
<i>SGM</i>	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

Samantha Manjarrez

Samantha Manjarrez
Chief Facilites Officer



December 12, 2023

Mrs. Fheryl Prestage
Chief Information Officer
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Mrs. Prestage:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest conveniences, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement
	I have reviewed the following and confirm that, within my area of responsibility, I have:
JP	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
JP	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.

JP	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
JP	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JP	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
JP	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
JP	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
JP	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
JP	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JP	1) Identified all employees, regardless of official title, who perform DEI duties.
JP	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
JP	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
JP	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
JP	5) Updated organizational charts, webpages, and program descriptions as may be needed.
JP	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not	

<p>otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JP</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p>JP</p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p>JP</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p>JP</p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JP</p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p>JP</p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p>JP</p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>

JP	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
JP	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
JP	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
JP	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JP	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
JP	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
JP	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

Fheryl J. Prestage

Fheryl Prestage
Chief Information Officer



December 12, 2023

Dr. Remmele Young
Associate Vice Chancellor, Public Information, Communications & External Affairs and Interim Chief of Staff
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Young:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

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I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
RJY	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.

	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
RJY	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
RJY	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
	1) Identified all employees, regardless of official title, who perform DEI duties.
	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
	5) Updated organizational charts, webpages, and program descriptions as may be needed.
	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not	

<p>otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.</p>	
RJY	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
RJY	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	
RJY	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>

	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."	
RJY	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
RJY	Attestation Statement I have reviewed the following and confirm that:
	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

Dr. Remmele Young
Associate Vice Chancellor



December 12, 2023

Karen L. Schmidt
President Houston Community College Foundation
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Ms. Schmidt:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity, and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest convenience, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

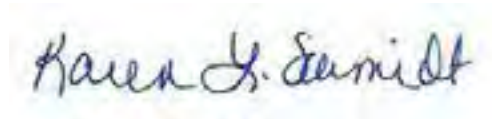
Prohibited Activity: Maintaining a DEI office, unit, or department.	
Initial if No Exception(s) to Report	Attestation Statement
	I have reviewed the following and confirm that, within my area of responsibility, I have:
KLS	1) Identified all offices, units, departments, councils, committees, and task forces, if any, within my area of responsibility that perform DEI activities.
KLS	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
KLS	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities in such office/unit/department.
KLS	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.

KLS	5) Reviewed webpages affiliated with my area of responsibility and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
KLS	1) Identified all employees, if any, regardless of official title, who perform DEI duties.
KLS	2) Identified all contracts, MOUs, and external agreements, if any, that provide or support DEI activities.
KLS	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
KLS	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
KLS	5) Updated organizational charts, webpages, and program descriptions as may be needed.
KLS	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
KLS	1) Evaluated student scholarship and grant applications, forms and standards for financial aid, internships, and educational opportunities to ensure no DEI statement is solicited, induced, or required or that any preferential treatment is given to individuals who submit one.
KLS	2) Evaluated grants and contracts to ensure DEI statements are not solicited or required.
KLS	3) Evaluated Foundation procedures, forms, and communications to ensure DEI statements are not solicited or required.
Prohibited Activity: Giving preference on the basis of race, sex, color, ethnicity, or national origin to a participant in any function of the institution.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
KLS	1) Reviewed Foundation practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin.
KLS	2) Generated a list of official programs (<i>e.g.</i> , mentoring, internship, and scholarship programs) and evaluated each to determine if prohibited criteria are used.
General Attestation:	

Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
KLS	1) I have exercised due diligence to determine that there are no violations of applicable laws, or HCC Foundation policies and regulations for my area of responsibility.
KLS	2) I have working knowledge of Senate Bill 17 and the HCC Foundation policies and regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,



Karen L, Schmidt
President, Houston Community College Foundation

cc: Miles T. Bradshaw, Counsel for the HCC Foundation



December 12, 2023

Dr. Muddassir Siddiqi
President, Central College
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Siddiqi:

I am providing this letter in connection with the College's compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest conveniences, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

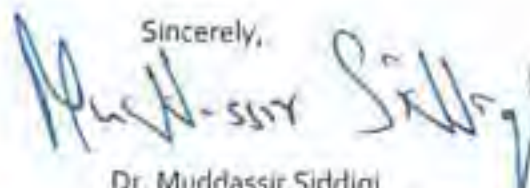
Prohibited Activity: Promoting policies and procedures designed or implemented "in-reference to race, color, or ethnicity" other than policies or procedures that are "approved in writing" by the institution's legal counsel and the Coordinating Board "for the sole purpose of ensuring compliance with any applicable court order or state or federal law."	
Initial if No Exception(s) to Report	Attestation Statement
MS	I have reviewed the following and confirm that, within my area of responsibility, I have:
MS	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
MS	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.

MS	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
MS	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MS	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
MS	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
MS	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
MS	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
MS	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MS	1) Identified all employees, regardless of official title, who perform DEI duties.
MS	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
MS	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
MS	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
MS	5) Updated organizational charts, webpages, and program descriptions as may be needed.
MS	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of "performing any institution function." The training is prohibited if it is "designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation" and is not	

<p>otherwise approved by the institution's legal counsel and the Coordinating Board for the "sole purpose" of complying with a court order or state or federal law.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>MS</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p>MS</p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p>MS</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p>MS</p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>MS</p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p>MS</p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p>MS</p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> Giving preference "on the basis of race, sex, color, ethnicity, or national origin" to applicants, employees, or participants in any function of the College; Influencing hiring or using employment practices "with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws." 	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>

MS	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
MS	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
MS	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
MS	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MS	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
MS	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
MS	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

 Dr. Muddassir Siddiqi
 President, Central College



December 12, 2023

Dr. Philip Nicotera
President, Coleman College
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Nicotera:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

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I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:

<i>PN</i>	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
<i>PN</i>	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
<i>PN</i>	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
<i>PN</i>	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>PN</i>	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
<i>PN</i>	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
<i>PN</i>	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
<i>PN</i>	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
<i>PN</i>	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
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<i>PN</i>	1) Identified all employees, regardless of official title, who perform DEI duties.
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PN	5) Updated organizational charts, webpages, and program descriptions as may be needed.
PN	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	
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General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
<i>PN</i>	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
<i>PN</i>	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

To: Dr. Phillip Nicotera

Dec 12, 2023

Page 5

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

: 
:

Dr. Phillip Nicotera
President, Coleman College



December 12, 2023

Dr. Michael Edwards
President, Northeast College
Houston Community College
3100 Main Street
Houston, TX 77002




RE: Senate Bill 17 Compliance.

Dear Dr. Edwards:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

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Sincerely,

Michael Edwards

Dr. Michael Edwards
President, Northeast College



December 12, 2023

Dr. Zachary Hodges
President, Northwest College
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Hodges:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

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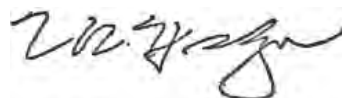
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<p>ZH</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
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Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
ZH	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
ZH	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
ZH	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,



Dr. Zachary Hodges
President, Northwest College



December 12, 2023

Dr. Jerome Drain
President, Online College and COE Academic Instruction
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Drain:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest conveniences, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
JD	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.

	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
JD	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
JD	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
JD	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
JD	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) Identified all employees, regardless of official title, who perform DEI duties.
JD	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
JD	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
JD	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
JD	5) Updated organizational charts, webpages, and program descriptions as may be needed.
JD	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not	

<p>otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JD</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p>JD</p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p>JD</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p>JD</p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JD</p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p>JD</p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p>JD</p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>

JD	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
JD	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
JD	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
JD	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
JD	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
JD	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

Jerome Drain

Dr. Jerome Drain
President, Online College

December 12, 2023

Dr. Frances Villagran-Glover
President, Southeast College and Interim Vice Chancellor, Student Services
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Villagran-Glover:

I am providing this letter in connection with the College's compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest convenience, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented "in reference to race, color, or ethnicity" other than policies or procedures that are "approved in writing" by the institution's legal counsel and the Coordinating Board "for the sole purpose of ensuring compliance with any applicable court order or state or federal law."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
F.V-G	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or

	federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
F.V-G	2) Reviewed instructional values, faculty and student handbooks, program descriptions, syllabi and first day handouts in order to evaluate whether they are permissible under state or federal law or court order.
F.V-G	3) Updated policies, procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
F.V-G	4) Evaluated instructional scholarships, grants, and contracts for which I have organizational responsibility to determine compliance.
F.V-G	5) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
F.V-G	6) Reviewed program descriptions, webpages, and related materials and any other instructional/departmental informational material.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
F.V-G	1) Identified all offices, units, departments, councils, committees, and task forces, if any, within my area of responsibility that perform DEI activities.
F.V-G	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
F.V-G	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities in such office/unit/department.
F.V-G	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
F.V-G	5) Reviewed webpages affiliated with my area of responsibility and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
F.V-G	1) Identified all employees, regardless of official title, who perform DEI duties.
F.V-G	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.

F.V-G	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
F.V-G	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
F.V-G	5) Updated organizational charts, webpages, and program descriptions as may be needed.
F.V-G	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of enrolling or “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
F.V-G	1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.
F.V-G	2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.
F.V-G	3) Updated programs and materials regarding required training in order to comply with SB 17.
F.V-G	4) Evaluated grants and contracts to assess whether they address prohibited training.
F.V-G	5) Evaluated whether DEI programming is offered at conventions and programs sponsored by external organizations.
Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
F.V-G	1) Evaluated student applications, forms and standards for financial aid, internships, and educational opportunities to ensure no DEI statement is solicited, induced or required or that any preferential treatment is given to individuals who submit one.

F. V-G	2) Generated a list of official programs (<i>e.g.</i> , food pantry, mentoring programs, extracurricular programs, scholarship programs) and evaluated each to determine if prohibited criteria are used.
F. V-G	3) Evaluated grants and contracts to ensure DEI statements are not solicited or required.
F. V-G	4) Evaluated procedures, student handbooks, forms and communications from departments for which I am responsible, including department-level handbooks and webpages, to ensure DEI statements are not solicited or required.
Prohibited Activity: Giving preference on the basis of race, sex, color, ethnicity, or national origin to a participant in any function of the institution.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
F. V-G	1) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin.
F. V-G	2) Reviewed processes surrounding funding/facility usage of recognized student organizations to ensure neutrality.
F. V-G	3) Reviewed College-sponsored (as opposed to recognized) organizations, if any, to determine if any are organized based on a prohibited category, and evaluated whether the sponsored organization, if any, is receiving preferential treatment vis-à-vis other organizations.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
F. V-G	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
F. V-G	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,



Dr. Frances Villagran-Glover
Interim Vice Chancellor Student Services



December 12, 2023

Dr. Madeline Burillo-Hopkins
President, Southwest College and Vice Chancellor, Workforce
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Burillo-Hopkins:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest conveniences, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:

MBH	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
MBH	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
MBH	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
MBH	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MBH	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
MBH	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
MBH	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
MBH	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
MBH	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MBH	1) Identified all employees, regardless of official title, who perform DEI duties.
MBH	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
MBH	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
MBH	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.

MBH	5) Updated organizational charts, webpages, and program descriptions as may be needed.
MBH	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MBH	1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.
MBH	2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.
MBH	3) Updated programs and materials regarding required training in order to comply with SB 17
MBH	4) Evaluated grants and contracts to assess whether they address prohibited training.
Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MBH	1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.
MBH	2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.
MBH	3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.
Prohibited Activity: <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring 	

process in accordance with any applicable state and federal antidiscrimination laws.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MBH	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
MBH	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
MBH	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
MBH	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MBH	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
MBH	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
MBH	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

A handwritten signature in black ink that reads "Madeline Burillo-Hopkins". The signature is written in a cursive style with a large initial 'M'.

Dr. Madeline Burillo-Hopkins
President, Southwest College



3100 Main Street, 12th Floor, Houston, TX 77002
general.counsel@hccs.edu
t: 713.718.7514
f: 713.718.7585

December 12, 2023

Marshall Heins
Senior Vice Chancellor, Finance & Administration, Chief Finance Officer & Chief Business Officer
Houston Community College
3100 Main Street
Houston, TX 77002

RE: **Senate Bill 17 Compliance.**

Dear Mr. Heins:

I am providing this letter in connection with the College's compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest conveniences, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented "in reference to race, color, or ethnicity" other than policies or procedures that are "approved in writing" by the institution's legal counsel and the Coordinating Board "for the sole purpose of ensuring compliance with any applicable court order or state or federal law."	
Initial (if No Exception(s) to Report)	Attestation Statement
	I have reviewed the following and confirm that, within my area of responsibility, I have:

MSA	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
MSA	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
MSA	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
MSA	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MSA	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
MSA	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
MSA	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
MSA	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
MSA	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MSA	1) Identified all employees, regardless of official title, who perform DEI duties.
MSA	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
MSA	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
MSA	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.

MSA MSA	5) Updated organizational charts, webpages, and program descriptions as may be needed.
MSA MSA	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of "performing any institution function." The training is prohibited if it is "designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation" and is not otherwise approved by the institution's legal counsel and the Coordinating Board for the "sole purpose" of complying with a court order or state or federal law.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MSA	1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.
MSA	2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.
MSA MSA	3) Updated programs and materials regarding required training in order to comply with SB 17
MSA MSA	4) Evaluated grants and contracts to assess whether they address prohibited training.
Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
MSA MSA	1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.
MSA MSA	2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.
MSA MSA	3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.
Prohibited Activity: <ul style="list-style-type: none"> Giving preference "on the basis of race, sex, color, ethnicity, or national origin" to applicants, employees, or participants in any function of the College; Influencing hiring or using employment practices "with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring 	

process in accordance with any applicable state and federal antidiscrimination laws."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>MSEA</i>	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
<i>MSEA</i>	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
<i>MSEA</i>	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
<i>MSEA</i>	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>MSEA</i>	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
<i>MSEA</i>	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
<i>MSEA</i>	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,



Marshall Heins
Senior Vice Chancellor

FINANCED ADMINISTRATION
CFO/CISO



December 12, 2023

Dr. Norma Perez
Chief Academic Officer and Interim Senior Vice Chancellor, Instructional Services & Student Services
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Perez:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest convenience, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>NP</i>	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
<i>NP</i>	2) Reviewed instructional values, faculty and student handbooks, program descriptions, syllabi and first day handouts in order to

	evaluate whether they are permissible under state or federal law or court order.
NP	3) Updated policies, procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
NP	4) Evaluated instructional scholarships, grants, and contracts for which I have organizational responsibility to determine compliance.
NP	5) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
NP	6) Reviewed program descriptions, webpages, and related materials and any other instructional/departmental informational material.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) Identified all offices, units, departments, councils, committees, and task forces, if any, within my area of responsibility that perform DEI activities.
NP	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
NP	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities in such office/unit/department.
NP	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
NP	5) Reviewed webpages affiliated with my area of responsibility and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) Identified all employees, regardless of official title, who perform DEI duties.
NP	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
NP	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
NP	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.

NP	5) Updated organizational charts, webpages, and program descriptions as may be needed.
NP	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.
NP	2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.
NP	3) Updated programs and materials regarding required training in order to comply with SB 17
NP	4) Evaluated grants and contracts to assess whether they address prohibited training.
Prohibited Activity: Giving preference on the basis of race, sex, color, ethnicity, or national origin to a participant in any function of the institution.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) I have reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
NP	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
NP	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

A handwritten signature in cursive script that reads "Norma Perez".

Dr. Norma Perez

Interim Senior Vice Chancellor, Student Services



February 15, 2024

Dr. Norma Perez
Chief Academic Officer and Interim Senior Vice Chancellor, Instructional Services & Student Services
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Perez:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest convenience, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
NP	2) Reviewed instructional values, faculty and student handbooks, program descriptions, syllabi and first day handouts in order to

	evaluate whether they are permissible under state or federal law or court order.
See note	3) Updated policies, procedures, handbooks, and program descriptions as needed in order to comply with SB 17. Note: Since the handbook is under review and is not yet finalized. Currently, the handbook is being reviewed by Talent Engagement and due back by February 16 and will be finalized and sent to OGC on March 8 . After OGC review, it is presented to the Faculty Senate in May for adoption for the upcoming academic year.
NP	4) Evaluated instructional scholarships, grants, and contracts for which I have organizational responsibility to determine compliance.
See note	5) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders. Note: The only outstanding concern is using "equity" and "equitable" in Faculty Academy workshops. Depending on the outside counsel's response, we can address these titling and delivery concerns immediately.
NP	6) Reviewed program descriptions, webpages, and related materials and any other instructional/departmental informational material.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) Identified all offices, units, departments, councils, committees, and task forces, if any, within my area of responsibility that perform DEI activities.
NP	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
NP	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities in such office/unit/department.
NP	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
NP	5) Reviewed webpages affiliated with my area of responsibility and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement

	I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) Identified all employees, regardless of official title, who perform DEI duties.
NP	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
NP	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
NP	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
NP	5) Updated organizational charts, webpages, and program descriptions as may be needed.
NP	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.
NP	2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.
NP	3) Updated programs and materials regarding required training in order to comply with SB 17
NP	4) Evaluated grants and contracts to assess whether they address prohibited training.
Prohibited Activity: Giving preference on the basis of race, sex, color, ethnicity, or national origin to a participant in any function of the institution.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:

NP	1) I have reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement
	I have reviewed the following and confirm that:
NP	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
NP	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,



Dr. Norma Perez
Interim Senior Vice Chancellor, Student Services



December 12, 2023

Dr. Andrea Burridge
Interim Vice Chancellor, Strategy, Planning & Institutional Effectiveness
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Dr. Burridge:

I am providing this letter in connection with the College's compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest conveniences, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

(Note from Strategy, Planning, and Institutional Effectiveness (SPIE))

Given the role of units in SPIE in applying grants, entrepreneurial initiatives, and data analytics, SPIE has identified several areas in which we are requesting additional guidance regarding approved activities. To this end, in my initial review, prior to distribution of this memo, I requested assistance and clarification in the course of discussions in the SB 17 policy update committee. I subsequently requested assistance on December 12th, 2023 and January 4th, 2024. Since that time, my team has been diligently working with General Counsel to ensure that we comply with SB 17. As my attestation reflects, additional guidance has been requested and provision of guidance from OGC is ongoing. Below I have indicated these areas.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented "in reference to race, color, or ethnicity" other than policies or procedures that are "approved in writing" by the institution's legal counsel and the Coordinating Board "for the sole purpose of ensuring compliance with any applicable court order or state or federal law."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
We are working with OGC regarding questions	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
We are working with OGC regarding questions	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
AB	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
We are working with OGC regarding questions	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
AB	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
AB	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.

AB	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
AB	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
AB	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
AB	1) Identified all employees, regardless of official title, who perform DEI duties.
AB	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
AB	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
AB	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
AB	5) Updated organizational charts, webpages, and program descriptions as may be needed.
AB	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
We are working with OGC to determine the definition of training.	1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.

AB	2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.
AB	3) Updated programs and materials regarding required training in order to comply with SB 17
AB We do not do DEI training	4) Evaluated grants and contracts to assess whether they address prohibited training.
Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.	
Initial if No Exception(s) to Report	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
AB	1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.
AB	2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.
AB	3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	
Initial if No Exception(s) to Report	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
AB	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
Working with OGC re: grants and contracts	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.

Working with OGC re: grants and contracts	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
AB	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
AB	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted, or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
AB	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
AB	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

Andrea Burridge

Dr. Andrea Burridge
Interim Vice Chancellor



December 12, 2023

Ms. Izzy Anderson
Vice Chancellor, Talent Engagement & Chief Human Resources Officer
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Ms. Anderson:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest convenience, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement
	I have reviewed the following and confirm that, within my area of responsibility, I have:
IGA	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
IGA	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.

IGA	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
IGA	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
IGA	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
IGA	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
IGA	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
IGA	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
IGA	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
IGA	1) Identified all employees, regardless of official title, who perform DEI duties.
IGA	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
IGA	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
IGA	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
IGA	5) Updated organizational charts, webpages, and program descriptions as may be needed.
IGA	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training for employees The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and	

the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	
Initial if No Exception(s) to Report	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
IGA	1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.
IGA	2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.
IGA	3) Updated programs and materials regarding required training in order to comply with SB 17
IGA	4) Evaluated grants and contracts to assess whether they address prohibited training.
Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.	
Initial if No Exception(s) to Report	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
IGA	1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.
IGA	2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.
IGA	3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	
Initial if No Exception(s) to Report	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>

IGA	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
IGA	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
IGA	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
IGA	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
IGA	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
IGA	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
IGA	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,

Izzy Anderson /s/

Dr. Izzy Anderson
Vice Chancellor, Talent Engagement



July 23, 2024

Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>SGM</i>	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
<i>SGM</i>	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
<i>SGM</i>	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
<i>SGM</i>	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.

Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>SGM</i>	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
<i>SGM</i>	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
<i>SGM</i>	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
<i>SGM</i>	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
<i>SGM</i>	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>SGM</i>	1) Identified all employees, regardless of official title, who perform DEI duties.
<i>SGM</i>	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
<i>SGM</i>	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
<i>SGM</i>	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
<i>SGM</i>	5) Updated organizational charts, webpages, and program descriptions as may be needed.
<i>SGM</i>	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>SGM</i></p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p><i>SGM</i></p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p><i>SGM</i></p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p><i>SGM</i></p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>SGM</i></p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p><i>SGM</i></p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p><i>SGM</i></p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>SGM</i></p>	<p>1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.</p>
<p><i>SGM</i></p>	<p>2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.</p>
<p><i>SGM</i></p>	<p>3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.</p>
<p><i>SGM</i></p>	<p>4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin</p>
<p>Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>SGM</i></p>	<p>1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.</p>
<p>General Attestation:</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that:</p>
<p><i>SGM</i></p>	<p>1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.</p>
<p><i>SGM</i></p>	<p>2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.</p>

I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,

Samantha Manjarrez

Samantha Manjarrez
Chief Facilities Officer



July 23, 2024

Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JP	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
JP	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
JP	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
JP	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.

Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JP	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
JP	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
JP	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
JP	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
JP	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JP	1) Identified all employees, regardless of official title, who perform DEI duties.
JP	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
JP	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
JP	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
JP	5) Updated organizational charts, webpages, and program descriptions as may be needed.
JP	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JP</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p>JP</p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p>JP</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p>JP</p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JP</p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p>JP</p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p>JP</p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JP</p>	<p>1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.</p>
<p>JP</p>	<p>2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.</p>
<p>JP</p>	<p>3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.</p>
<p>JP</p>	<p>4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin</p>
<p>Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JP</p>	<p>1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.</p>
<p>General Attestation:</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that:</p>
<p>JP</p>	<p>1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.</p>
<p>JP</p>	<p>2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.</p>

I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,

Fheryl J. Prestage

[NAME] Fheryl J. Prestage

[TITLE] Chief Information Officer (CIO)



July 23, 2024

Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
RJY	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
RJY	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
RJY	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
RJY	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.

Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
RJY	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
RJY	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
RJY	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
RJY	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
RJY	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
RJY	1) Identified all employees, regardless of official title, who perform DEI duties.
RJY	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
RJY	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
RJY	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
RJY	5) Updated organizational charts, webpages, and program descriptions as may be needed.
RJY	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>RJY</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p>RJY</p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p>RJY</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p>RJY</p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>RJY</p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p>RJY</p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p>RJY</p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	

Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
RJY	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
RJY	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
RJY	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
RJY	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
RJY	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
RJY	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
RJY	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,

/s/ Remmele J. Young

Remmele J. Young
Vice Chancellor/Interim Chief of Staff



HCC Foundation
Executive Committee

Ryan McCaulley
Board Chair

David Regenbaum
Immediate Past Chair

Tracy Janda
Vice Chair of
Board Relations

Antrece L. Baggott, Ed.D.
Vice Chair of
Fundraising

Ed Fierro
Vice Chair of
Governance

Jeanne M. Fardus
Secretary

Cecelia Allen
Treasurer

Margaret Ford Fisher, Ed.D.
HCC Chancellor

Karen L. Schmidt, M.B.A., CFRE
HCC Foundation President

July 24, 2024

Ms. Lucie Tredennick,
Assistant General Counsel
Houston Community College
3100 Main, 12th floor
Houston, TX 77002

RE: SB17 Attestation Letter

Dear Ms. Tredennick,

As required by the Office of HCC's General Counsel, attached is the Houston Community College Foundation ("HCCF") SB17 Attestation letter. We have reviewed the original letter dated 12/12/2023, reviewed it with HCCF's legal counsel, the HCCF Executive Committee, and the final (attached) attestation letter has been approved by the HCC Foundation Board at its quarterly Board meeting on February 29, 2024.

I can affirm that to the best of my knowledge and belief, from February 29, 2024 through July 24, 2024, the HCC Foundation has had no changes that would impact our responses on the attached letter submitted on February 29, 2024.

Please let me know if I may be of further assistance.

Sincerely,

Karen L. Schmidt, CFRE
President
Houston Community College Foundation

cc: Miles Bradshaw, HCC Foundation Board Executive Committee
(via email: milesbradshaw2@gmail.com)

HCC Executive Committee
c/o Silvia Romero, Coordinator, Board Services
(via email: silvia.romero@hccs.edu)

Attachment: Attestation Letter dated 12/12/2023



December 12, 2023

Karen L. Schmidt
President Houston Community College Foundation
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance.

Dear Ms. Schmidt:

I am providing this letter in connection with the College’s compliance efforts regarding Senate Bill 17, which prohibits diversity, equity, and inclusion initiatives in institutions of higher education. The Board of Trustees recently updated its Strategic Plan and adopted policies in response to the requirements of SB 17. The administration must now ensure compliance on an operational level. The following areas have been determined to potentially be within your operating responsibility. Please coordinate with your key administrators and complete the following attestation. The TASB [FAQs](#) are a helpful resource to determine what is and is not permissible.

SB 17 goes into effect on January 1, 2024. If, during your initial review of the following items, any area presents a major concern, contact general.counsel@hccs.edu prior to the close of the College for the winter break. Otherwise, coordinate with your key administrators and complete the following attestation at your earliest convenience, but no later than February 15, 2024, and return it to general.counsel@hccs.edu.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and belief, the following representations are true:

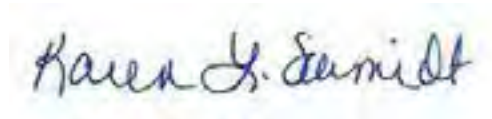
Prohibited Activity: Maintaining a DEI office, unit, or department.	
Initial if No Exception(s) to Report	Attestation Statement
	I have reviewed the following and confirm that, within my area of responsibility, I have:
KLS	1) Identified all offices, units, departments, councils, committees, and task forces, if any, within my area of responsibility that perform DEI activities.
KLS	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
KLS	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities in such office/unit/department.
KLS	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.

KLS	5) Reviewed webpages affiliated with my area of responsibility and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
KLS	1) Identified all employees, if any, regardless of official title, who perform DEI duties.
KLS	2) Identified all contracts, MOUs, and external agreements, if any, that provide or support DEI activities.
KLS	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
KLS	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
KLS	5) Updated organizational charts, webpages, and program descriptions as may be needed.
KLS	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
KLS	1) Evaluated student scholarship and grant applications, forms and standards for financial aid, internships, and educational opportunities to ensure no DEI statement is solicited, induced, or required or that any preferential treatment is given to individuals who submit one.
KLS	2) Evaluated grants and contracts to ensure DEI statements are not solicited or required.
KLS	3) Evaluated Foundation procedures, forms, and communications to ensure DEI statements are not solicited or required.
Prohibited Activity: Giving preference on the basis of race, sex, color, ethnicity, or national origin to a participant in any function of the institution.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
KLS	1) Reviewed Foundation practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin.
KLS	2) Generated a list of official programs (<i>e.g.</i> , mentoring, internship, and scholarship programs) and evaluated each to determine if prohibited criteria are used.
General Attestation:	

Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
KLS	1) I have exercised due diligence to determine that there are no violations of applicable laws, or HCC Foundation policies and regulations for my area of responsibility.
KLS	2) I have working knowledge of Senate Bill 17 and the HCC Foundation policies and regulations that are applicable to my area of responsibility.

Please note that details of any material issues or disclosures, if not previously communicated, should be sent to general.counsel@hccs.edu.

Sincerely,



Karen L, Schmidt
President, Houston Community College Foundation

cc: Miles T. Bradshaw, Counsel for the HCC Foundation



July 23, 2024


Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002



RE: Senate Bill 17 Compliance



Dear Dr. Montgomery:




I am providing this letter in connection with the College's continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College's responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

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To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

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Sincerely,

A handwritten signature in black ink, appearing to read "Edmund Herod", written over a horizontal line.

Dr. Edmund "Butch" Herod
President (Interim)



July 23, 2024





Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002


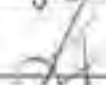

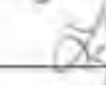


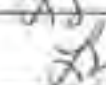
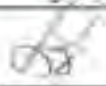



RE: **Senate Bill 17 Compliance**








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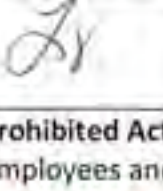


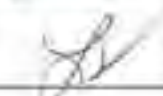
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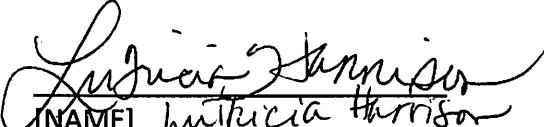
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To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

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Sincerely,


[NAME] Leticia Harrison
[TITLE] President



July 23, 2024

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Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

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To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

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[NAME] Michael Edwards
[TITLE] President, HCC Northeast College



July 23, 2024

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<p>24</p>	<p>2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.</p>
<p>24</p>	<p>3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.</p>
<p>24</p>	<p>4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin</p>
<p>Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>24</p>	<p>1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.</p>
<p>General Attestation:</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that:</p>
<p>24</p>	<p>1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.</p>
<p>24</p>	<p>2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.</p>

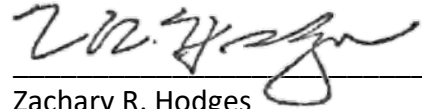
I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,

A handwritten signature in black ink, appearing to read "Z. Hodges", written over a horizontal line.

Zachary R. Hodges
President, Northwest College



July 23, 2024

Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
JD	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
JD	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
JD	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.

Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
JD	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
JD	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
JD	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
JD	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) Identified all employees, regardless of official title, who perform DEI duties.
JD	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
JD	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
JD	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
JD	5) Updated organizational charts, webpages, and program descriptions as may be needed.
JD	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JD</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p>JD</p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p>JD</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p>JD</p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>JD</p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p>JD</p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p>JD</p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	

Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
JD	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
JD	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
JD	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
JD	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
JD	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
JD	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

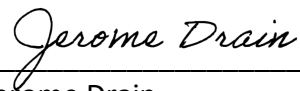
I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,

A handwritten signature in cursive script that reads "Jerome Drain". The signature is written in black ink and is positioned above a horizontal line.

Jerome Drain
Interim President, HCC Online

July 23, 2024

Nicole Montgomery, Interim General Counsel
 Office of General Counsel
 Houston Community College
 3100 Main Street
 Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College's continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College's responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

<p>Prohibited Activity: Promoting policies and procedures designed or implemented "in reference to race, color, or ethnicity" other than policies or procedures that are "approved in writing" by the institution's legal counsel and the Coordinating Board "for the sole purpose of ensuring compliance with any applicable court order or state or federal law."</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>ZMG</i></p>	<p>1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.</p>
<p><i>ZMG</i></p>	<p>2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.</p>
<p><i>ZMG</i></p>	<p>3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.</p>
<p><i>ZMG</i></p>	<p>4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.</p>

Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
FM	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
FM	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
FM	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
FM	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
FM	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
FM	1) Identified all employees, regardless of official title, who perform DEI duties.
FM	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
FM	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
FM	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
FM	5) Updated organizational charts, webpages, and program descriptions as may be needed.
FM	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of "performing any institution function." The training is prohibited if it is "designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation" and is not otherwise approved by the institution's legal counsel and the Coordinating Board for the "sole purpose" of complying with a court order or state or federal law.	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>ML</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p>ML</p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p>ML</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p>ML</p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>ML</p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p>ML</p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p>ML</p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference "on the basis of race, sex, color, ethnicity, or national origin" to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices "with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws." 	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>FLC</i></p>	<p>1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.</p>
<p><i>FLC</i></p>	<p>2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.</p>
<p><i>FLC</i></p>	<p>3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.</p>
<p><i>FLC</i></p>	<p>4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin</p>
<p>Prohibited Activity: Promoting "differential treatment" or providing "special benefits" to employees and applicants on the basis of "race, color, or ethnicity."</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>FLC</i></p>	<p>1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.</p>
<p>General Attestation:</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that:</p>
<p><i>FLC</i></p>	<p>1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.</p>
<p><i>FLC</i></p>	<p>2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.</p>

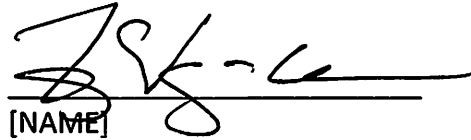
I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,

A handwritten signature in black ink, appearing to be "J. K. [unclear]", written over a horizontal line.

[NAME]

[TITLE]



July 23, 2024

Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

We are providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. We have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

To the best of our knowledge there are no items under the preview of the College President authority at SW College non-compliant with SB17. We do request however, a review of the MOU for the UNIDOS grant partnership to confirm compliance with SB17.

We confirm that within the areas of my operating responsibility and to the best of our knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report <i>M.W</i>	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.

	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report <i>MW</i>	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report <i>MW</i>	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
	1) Identified all employees, regardless of official title, who perform DEI duties.
	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
	5) Updated organizational charts, webpages, and program descriptions as may be needed.
	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to	

<p>race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.</p>	
<p>Initial if No Exception(s) to Report</p> <p><i>MW</i></p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p> <p><i>MW</i></p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	

<p>Initial if No Exception(s) to Report <i>MW</i></p>	<p>Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
	<p>1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.</p>
	<p>2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.</p>
	<p>3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.</p>
	<p>4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin</p>
<p>Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”</p>	
<p>Initial if No Exception(s) to Report <i>MW</i></p>	<p>Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
	<p>1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.</p>
<p>General Attestation:</p>	
<p>Initial if No Exception(s) to Report <i>MW</i></p>	<p>Attestation Statement I have reviewed the following and confirm that:</p>
	<p>1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.</p>
	<p>2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.</p>

We agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, we understand that if we have any

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

questions regarding any of the foregoing responsibilities and attestations, we should seek guidance from the Office of General Counsel.

Sincerely,

Madeline Burillo-Hopkins
President, HCC Southwest



Michael Webster
Interim President, HCC Southwest



July 23, 2024

Nicole Montgomery, Interim General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
NP	2) Reviewed instructional values, faculty and student handbooks, program descriptions, syllabi and first day handouts in order to evaluate whether they are permissible under state or federal law or court order.
NP	3) Updated policies, procedures, handbooks, and program descriptions as needed in order to comply with SB 17. Faculty Handbook in General Counsel Office for final review.
NP	4) Evaluated instructional scholarships, grants, and contracts for which I have organizational responsibility to determine compliance.

NP	5) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
NP	6) Reviewed program descriptions, webpages, and related materials and any other instructional/departmental informational material.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) Identified all offices, units, departments, councils, committees, and task forces, if any, within my area of responsibility that perform DEI activities.
NP	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
NP	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities in such office/unit/department.
NP	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
NP	5) Reviewed webpages affiliated with my area of responsibility and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
NP	1) Identified all employees, regardless of official title, who perform DEI duties.
NP	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
NP	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
NP	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
NP	5) Updated organizational charts, webpages, and program descriptions as may be needed.

NP	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
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NP	3) Updated programs and materials regarding required training in order to comply with SB 17
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NP	1) I have reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin.
<p>General Attestation:</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that:</p>
NP	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.

NP	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.
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I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,



Dr. Norma Perez
Chief Academic Officer &
Interim Senior Vice Chancellor,
Instructional Services & Student Services



July 23, 2024

Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

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WH	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
WH	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
WH	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.

Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
WA	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
WA	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
WA	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
WA	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
WA	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
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<p>WH</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
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<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
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WH	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
WH	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”	
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General Attestation:	
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WH	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

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To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

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Sincerely,

Warren Hurd

[NAME] Warren L Hurd

[TITLE] Interim VC, Administration & Operations



July 23, 2024

Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

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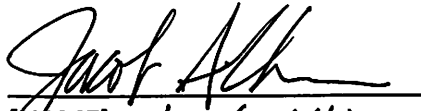
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To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

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Sincerely,


[NAME] *Jacob Atkin*
[TITLE] *Interim VC for Finance*



July 23, 2024

Nicole Montgomery, Interim General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the Frequently Asked Questions (FAQs) Regarding Diversity, Equity, and Inclusion Activities (Senate Bill 17) to understand what the law covers and the College’s responsibilities going forward.

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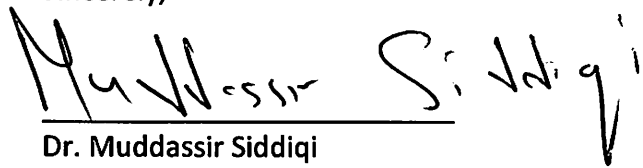
To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
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Sincerely,



Dr. Muddassir Siddiqi
Vice Chancellor,
Instructional Innovation & Digital strategy

July 23, 2024





Nicole Montgomery, Interim General Counsel
 Houston Community College
 3100 Main Street
 Houston, TX 77002

RE: Senate Bill 17 Compliance







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To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 4

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Sincerely,



Dr. Miguel A. Ramos
Interim Vice Chancellor, Instructional
Services



July 23, 2024

Nicole Montgomery, Interim General Counsel
Office of General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
ab	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
ab	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
ab	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
ab	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.

Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
ab	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
ab	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
ab	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
ab	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
ab	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
ab	1) Identified all employees, regardless of official title, who perform DEI duties.
ab	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
ab	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
ab	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
ab	5) Updated organizational charts, webpages, and program descriptions as may be needed.
ab	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training as a condition of “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>ab</p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p>ab</p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p>ab</p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p>ab</p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p>ab</p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p>ab</p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p>ab</p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	

Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
ab	1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.
ab	2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.
ab	3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.
ab	4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin
Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
ab	1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
ab	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
ab	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
Page 5

questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,

Andrea Burrige
Interim VC, SPIE

[NAME]

[TITLE]



July 23, 2024

Nicole Montgomery, Interim General Counsel
Houston Community College
3100 Main Street
Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement
	I have reviewed the following and confirm that, within my area of responsibility, I have:
RA	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
RA	2) Reviewed instructional values, faculty and student handbooks, program descriptions, syllabi and first day handouts in order to evaluate whether they are permissible under state or federal law or court order.
RA	3) Updated policies, procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
RA	4) Evaluated instructional scholarships, grants, and contracts for which I have organizational responsibility to determine compliance.

RA	5) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
RA	6) Reviewed program descriptions, webpages, and related materials and any other instructional/departmental informational material.
Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
RA	1) Identified all offices, units, departments, councils, committees, and task forces, if any, within my area of responsibility that perform DEI activities.
RA	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
RA	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities in such office/unit/department.
RA	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
RA	5) Reviewed webpages affiliated with my area of responsibility and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
RA	1) Identified all employees, regardless of official title, who perform DEI duties.
RA	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
RA	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
RA	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
RA	5) Updated organizational charts, webpages, and program descriptions as may be needed.

RA	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
<p>Prohibited Activity: Requiring DEI training as a condition of enrolling or “performing any institution function.” The training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
RA	1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.
RA	2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.
RA	3) Updated programs and materials regarding required training in order to comply with SB 17.
RA	4) Evaluated grants and contracts to assess whether they address prohibited training.
RA	5) Evaluated whether DEI programming is offered at conventions and programs sponsored by external organizations.
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
RA	1) Evaluated student applications, forms and standards for financial aid, internships, and educational opportunities to ensure no DEI statement is solicited, induced or required or that any preferential treatment is given to individuals who submit one.
RA	2) Generated a list of official programs (e.g., food pantry, mentoring programs, extracurricular programs, scholarship programs) and evaluated each to determine if prohibited criteria are used.

RA	3) Evaluated grants and contracts to ensure DEI statements are not solicited or required.
RA	4) Evaluated procedures, student handbooks, forms and communications from departments for which I am responsible, including department-level handbooks and webpages, to ensure DEI statements are not solicited or required.
Prohibited Activity: Giving preference on the basis of race, sex, color, ethnicity, or national origin to a participant in any function of the institution.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
RA	1) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin.
RA	2) Reviewed processes surrounding funding/facility usage of recognized student organizations to ensure neutrality.
RA	3) Reviewed College-sponsored (as opposed to recognized) organizations, if any, to determine if any are organized based on a prohibited category, and evaluated whether the sponsored organization, if any, is receiving preferential treatment vis-à-vis other organizations.
General Attestation:	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that:
RA	1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.
RA	2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.

I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 23, 2024
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Sincerely,

A handwritten signature in cursive script that reads "Rima Adil". The signature is written in black ink and is positioned above a horizontal line.

Dr. Rima Adil
Interim Vice Chancellor, Student Services

July 19, 2024

Nicole Montgomery, General Counsel
 Houston Community College
 3100 Main Street
 Houston, TX 77002

RE: Senate Bill 17 Compliance

Dear Dr. Montgomery:

I am providing this letter in connection with the College’s continued compliance with Senate Bill 17, which is located at Texas Education Code Section 51.5325. I have reviewed the [Frequently Asked Questions \(FAQs\) Regarding Diversity, Equity, and Inclusion Activities \(Senate Bill 17\)](#) to understand what the law covers and the College’s responsibilities going forward.

I confirm that within the areas of my operating responsibility and to the best of my knowledge and in the exercise of due diligence, the following representations are true:

Prohibited Activity: Promoting policies and procedures designed or implemented “in reference to race, color, or ethnicity” other than policies or procedures that are “approved in writing” by the institution’s legal counsel and the Coordinating Board “for the sole purpose of ensuring compliance with any applicable court order or state or federal law.”	
Initial if No Exception(s) to Report	Attestation Statement
	I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>N.A.</i>	1) To the extent any procedures reference race, color, or ethnicity, evaluated whether such procedures are required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board.
<i>N.A.</i>	2) Updated procedures, handbooks, and program descriptions as needed in order to comply with SB 17.
<i>N.A.</i>	3) Reviewed internal professional development programs to ensure compliance with SB 17 as well as federal laws or court orders.
<i>N.A.</i>	4) Reviewed program descriptions, webpages, and related materials and any other departmental informational material to ensure compliance.

Prohibited Activity: Maintaining a DEI office, unit or department.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>N.A.</i>	1) Identified all offices, units, departments, councils, committees, and task forces, if any, that perform DEI activities.
<i>N.A.</i>	2) Evaluated whether activities of any entities identified in paragraph 1) above cover prohibited subjects.
<i>N.A.</i>	3) Taken steps to (i) dissolve any office, unit, or department that performs DEI activities or (ii) formally discontinue the DEI activities.
<i>N.A.</i>	4) Updated program descriptions, brochures, organizational charts, and job descriptions as may be needed.
<i>N.A.</i>	5) Reviewed webpages and identified any that contain DEI-related information. If any were identified, I have taken steps to amend or delete them in order to comply with SB 17.
Prohibited Activity: Hiring or assigning an employee or contractor to perform the duties of a DEI office.	
Initial if No Exception(s) to Report	Attestation Statement I have reviewed the following and confirm that, within my area of responsibility, I have:
<i>N.A.</i>	1) Identified all employees, regardless of official title, who perform DEI duties.
<i>N.A.</i>	2) Identified all contracts, MOUs, and external agreements that provide or support DEI activities.
<i>N.A.</i>	3) Evaluated whether the activities identified in 2) above cover prohibited subjects.
<i>N.A.</i>	4) Taken steps to eliminate position(s), reassign employees, reformulate job descriptions, and terminate external contracts that conflict with SB 17.
<i>N.A.</i>	5) Updated organizational charts, webpages, and program descriptions as may be needed.
<i>N.A.</i>	6) Evaluated mentoring programs and other related offerings and evaluated if prohibited criteria are used.
Prohibited Activity: Requiring DEI training for employees. DEI training is prohibited if it is “designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation” and is not otherwise approved by the institution’s legal counsel and the Coordinating Board for the “sole purpose” of complying with a court order or state or federal law.	

<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>7.A.</i></p>	<p>1) Evaluated the content of training programs and materials (handouts, slide show presentations, etc), if any, and determined whether training that is designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required.</p>
<p><i>7.A.</i></p>	<p>2) Determined whether any required training designed or implemented in reference to race, color, ethnicity, gender identity, or sexual orientation is required by state or federal law or court order. If so, I have obtained written approval from legal counsel and the Coordinating Board for such training.</p>
<p><i>7.A.</i></p>	<p>3) Updated programs and materials regarding required training in order to comply with SB 17</p>
<p><i>7.A.</i></p>	<p>4) Evaluated grants and contracts to assess whether they address prohibited training.</p>
<p>Prohibited Activity: Requiring, soliciting, or inducing individuals to provide a DEI statement or give preferential treatment to individuals who sign a DEI statement.</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>7.A.</i></p>	<p>1) Evaluated department-level handbooks, procedures, and programs for DEI-related standards or rules.</p>
<p><i>7.A.</i></p>	<p>2) Ensured that individuals are not required, solicited or induced to sign a DEI statement.</p>
<p><i>7.A.</i></p>	<p>3) Ensured that individuals are not given preferential treatment for providing or submitting a DEI statement.</p>
<p>Prohibited Activity:</p> <ul style="list-style-type: none"> • Giving preference “on the basis of race, sex, color, ethnicity, or national origin” to applicants, employees, or participants in any function of the College; • Influencing hiring or using employment practices “with respect to race, sex, color, or ethnicity, other than through the use of color-blind and sex-neutral hiring process in accordance with any applicable state and federal antidiscrimination laws.” 	

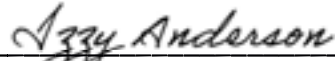
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>J.A.</i></p>	<p>1) Evaluated employment practices, job postings, interview committee guidelines, selection committee training materials, screening matrices to ensure that no preferential treatment based on race, sex, color, ethnicity, or national origin is given.</p>
<p><i>J.A.</i></p>	<p>2) Evaluated grants and contracts to ensure that no preferential treatment based on race, sex, color, or ethnicity is given.</p>
<p><i>J.A.</i></p>	<p>3) Evaluated and updated webpages as needed to ensure no preferential treatment based on race, sex, color, or ethnicity is indicated.</p>
<p><i>J.A.</i></p>	<p>4) Reviewed departmental practices, programs, and publications to ensure none promote preferential treatment on the basis of race, sex, color, ethnicity, or national origin</p>
<p>Prohibited Activity: Promoting “differential treatment” or providing “special benefits” to employees and applicants on the basis of “race, color, or ethnicity.”</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that, within my area of responsibility, I have:</p>
<p><i>J.A.</i></p>	<p>1) Evaluated employment practices, grants and contracts, and departmental practices to ensure that no differential treatment is promoted or special benefits provided on the basis of race, color, or ethnicity.</p>
<p>General Attestation:</p>	
<p>Initial if No Exception(s) to Report</p>	<p>Attestation Statement</p> <p>I have reviewed the following and confirm that:</p>
<p><i>J.A.</i></p>	<p>1) I have exercised due diligence to determine that there are no violations of laws, policies, or regulations for my area of responsibility.</p>
<p><i>J.A.</i></p>	<p>2) I have working knowledge of Senate Bill 17 and the Board policies regulations that are applicable to my area of responsibility.</p>

To: Nicole Montgomery, Interim General Counsel
Re: SB 17 Compliance

July 19, 2024
Page 5

I agree to send details of any material issues or disclosures, if not previously communicated, to general.counsel@hccs.edu. Likewise, I understand that if I have any questions regarding any of the foregoing responsibilities and attestations, I should seek guidance from the Office of General Counsel.

Sincerely,



Dr. Izzy Anderson
Chief Human Resources Officer &
Vice Chancellor, Talent Engagement



Exhibit E:

**HCC's Response to
State Auditor's Inquiry**

RE: State Auditor's Office - Senate Bill 17: Request for Information

terrance.corrigan <terrance.corrigan@hccs.edu>

Tue 4/30/2024 11:15 AM

To: Jeff Criminger <Jeff.Criminger@sao.texas.gov>

Cc: Margaret.FordFisher <margaret.fordfisher@hccs.edu>; Jennifer Brantley <Jennifer.Brantley@sao.texas.gov>; Board Services <board.services@hccs.edu>

1 attachments (268 KB)

State Auditors Office - Senate Bill 17 - Request for Information.pdf;

Good morning Mr. Criminger,

Please find the attached letter with HCC's responses to the subject request for information.

Best regards,

Terry Corrigan

Director, Internal Audit



3100 Main St, 11th Floor

Houston, TX 77002

713.718.7278

HCC Internal Audit – <https://www.hccs.edu/departments/internal-auditing/>

HCC's Compliance & Ethics information – <https://www.hccs.edu/about-hcc/compliance--ethics/>

From: Jeff Criminger <Jeff.Criminger@sao.texas.gov>

Sent: Wednesday, April 17, 2024 11:44 AM

To: 'board.services@hccs.edu' <board.services@hccs.edu>

Cc: 'margaret.fordfisher@hccs.edu' <margaret.fordfisher@hccs.edu>; 'terrance.corrigan@hccs.edu' <terrance.corrigan@hccs.edu>; Jennifer Brantley <Jennifer.Brantley@sao.texas.gov>

Subject: State Auditor's Office - Senate Bill 17: Request for Information

Good morning,

Senate Bill 17 (88th Legislature, Regular Session) directs the State Auditor's Office (Office) to conduct a compliance audit of each institution of higher education (Institution) to determine whether the Institution has spent state money in violation of Texas Government Code, Section 51.3525. Below you will find a list of questions that will allow our Office to begin developing our procedures to address Senate Bill 17.

1. Has the Institution's governing board (Board) created specific policies, procedures, or guidelines to ensure that state funds are not spent in violation of Senate Bill 17 (SB17)? If so, please provide them.
2. Who would be the best point(s) of contact at the Institution for matters related to overseeing compliance with SB17?
3. Does the Institution's internal audit function intend to audit, or plan to review, the Institution's compliance with SB17?
4. Will the Board or its designee certify to the Legislature and the Texas Higher Education Coordinating Board by August 31, 2024, that the Institution is in compliance with SB17?

Please respond by **April 30, 2024**. After we have received and reviewed the responses to these questions, we may follow-up with your Institution's point of contact.

Senate Bill 17 also directs our Office to adopt a schedule to ensure that each Institution is audited at least once every four years. Currently, your Institution is not scheduled to be audited for compliance with Senate Bill 17 in fiscal year 2025.

Thank you in advance for your prompt attention to this request.



Jeffrey Criminger, CFE

Managing Senior Auditor

1501 N. Congress Avenue

Austin, Texas 78701

☎ 512-936-9590

INTEGRITY. JUDGMENT. INDEPENDENCE.

This message contains information which may be an audit working paper and/or may be confidential, privileged, or otherwise exempt from the requirements of the Public Information Act. Please contact the State Auditor's Office at publicinformation@sao.texas.gov if this email message or any associated attachments are requested, or are part of documents responsive to a request, under the Public Information Act.



April 30, 2024

Jeffrey Criminger
Managing Senior Auditor
State Auditor's Office
1501 N. Congress Avenue
Austin, TX 78701

RE: State Auditor's Office – Senate Bill 17: Request for Information

Please find the below responses to the subject request for information.

1. Has the Institution's governing board (Board) created specific policies, procedures, or guidelines to ensure that state funds are not spent in violation of Senate Bill 17 (SB17)? If so, please provide them.

Houston Community College System's Board of Trustees (the "Board") has updated its policies to ensure that state funds are not spent in violation of Senate Bill 17 (SB17). Those policies include:

Approved by the Board on November 15, 2023:

- BFA (Local) – Chief Executive Officer: Qualifications and Duties,
- BI (Local) – Delegation of Reporting Authority,
- CFE (Local) - Purchasing and Acquisition: Vendor Relations,
- DAA (Local) - Employment Objectives: Equal Employment Opportunity,
- FA (Local) - Equal Educational Opportunity

Approved by the Board on April 17, 2024:

- BG (Local) - Administrative Organization,
- Additional updates to CFE (Local) -Purchasing and Acquisition: Vendor Relations,
- Additional updates to DAA (Local) - Employment Objectives: Equal Employment Opportunity,
- Additional updates to FA (Local) - Equal Educational Opportunity

Additionally, the Board adopted an updated Strategic Plan on November 15, 2023 to demonstrate HCC's commitment to compliance with SB 17.

2. Who would be the best point(s) of contact at the Institution for matters related to overseeing compliance with SB17?

The best points of contact at Houston Community College (HCC) for matters related to overseeing compliance with SB 17 are the following individuals in the Office of General Counsel:

To: Jeffrey Criminger
Re: State Auditor's Office – Senate Bill 17: Request for Information

April 30, 2024
Page 2

Nicole Montgomery, Deputy General Counsel
Phone: 713-718-7023
Email: nicole.montgomery@hccs.edu

Lucie Tredennick, Assistant General Counsel/Compliance
Phone: 713-718-8295
Email: lucie.tredennick@hccs.edu

3. Does the Institution's internal audit function intend to audit, or plan to review, the Institution's compliance with SB17?

Yes. HCC's Internal Audit Department will conduct an audit of HCC's compliance with SB 17 as part of its Fiscal Year 2024 Internal Audit Plan, Project No. 24-C-2, as approved by HCC's Board of Trustees on August 16, 2023. Internal Audit plans to complete the audit by August 31, 2024.

4. Will the Board or its designee certify to the Legislature and the Texas Higher Education Coordinating Board by August 31, 2024, that the Institution is in compliance with SB17?

Yes. The Chancellor, as the designee of the Board through Board Policy BI (Local), will certify to the Legislature and the Texas Higher Education Coordinating Board by August 31, 2024 that HCC is in compliance with SB 17.

Best regards,



Terry Corrigan
Director, Internal Audit



3100 Main St, 11th Floor
Houston, TX 77002
713.718.7278
HCC Internal Audit – <https://www.hccs.edu/departments/internal-auditing/>

HCC's Compliance & Ethics information – <https://www.hccs.edu/about-hcc/compliance--ethics/>

CC: Dr. Margaret Ford Fisher, HCC Chancellor
HCC Board Services
Jennifer Brantley, SAO



Exhibit F:
**HCC's Other Supporting
Documentation**

Texas Senate Bill 17 – Elimination of Diversity Equity and Inclusion Officer Position

Office of the Chancellor <office.chancellor@hccs.edu>

Fri 6/23/2023 4:09 PM

To:



HOUSTON COMMUNITY COLLEGE
Office of the Chancellor

June 23, 2023

Dear HCC Family,

Over the past few years, the focus of the College's Diversity, Equity, and Inclusion (DEI) efforts has been to build a culture of belonging within HCC and to implement a vision that fosters success for all students from all backgrounds and perspectives. While we remain firmly committed to fostering an inclusive, welcoming college culture – we are also committed to comply with all legal requirements and operate within the guidelines of Texas Senate Bill (SB) 17. The new law prohibits DEI offices and the employment of personnel who perform DEI-related duties.

In response to Texas SB 17, the college's Diversity Equity and Inclusion Officer position is now being eliminated. Further, the Offices of General Counsel and Talent Engagement are currently studying the implications of the new law, and are working to identify any additional adjustments necessary to our organization. Dr. Darin Baskin, the interim DEI Officer, will return to his prior position as Director of Quality Enhancement Plan (QEP) and report to Dr. Kurt Ewen.

The creation, implementation, assessment, and completion of the QEP is impactful on student success and is a requirement of accreditation with the Southern Association of Colleges and Schools Commission on Colleges. This work provides the framework for improvement in learning outcomes.

Please join me in thanking Dr. Baskin for his willingness to serve as interim DEI Officer. His unwavering commitment to improving the student experience is an asset to the College and we look forward to his outstanding work in our QEP.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cesar Maldonado'.

Cesar Maldonado, Ph.D., P.E.
Chancellor



Houston Community College (HCC) is composed of 14 Centers of Excellence and numerous satellite centers that serve the diverse communities in the Greater Houston area by preparing individuals to live and work in an increasingly international and technological society. HCC is one of the country's largest singly-accredited, open-admission, community colleges offering associate degrees, certificates, workforce training, and lifelong learning opportunities. To learn more, visit www.hccs.edu.

3100 Main Street | Houston, TX 77002 | 713.718.2000



Houston Community College supports, and the College is committed to, providing a learning and working environment that promotes personal integrity, civility, and mutual respect in an environment free of discrimination and harassment on the basis of race, color, religion, sex, gender identity and gender expression, national origin, age, disability, sexual orientation, or veteran status. The following person has been designated to handle inquiries regarding the nondiscrimination policies: David Cross, Director EEO/Compliance, 3100 Main Street, Houston, TX 77002, 713.718.8271 or Institutional.Equity@hccs.edu.

MEMORANDUM

TO: Diversity, Equity, and Inclusion (“DEI”) Leadership Council Ref: CM23-061
File: GD

FROM: Dr. Cesar Maldonado, Chancellor

CC: E. Ashley Smith, General Counsel
Dr. Izzy Anderson, Vice Chancellor of Talent Engagement & CHRO

DATE: July 31, 2023

SUBJECT: Sunset of Diversity, Equity, and Inclusion (DEI) Council

On June 23, 2023, I announced the sunsetting of Houston Community College System’s (HCCS) Diversity, Equity, and Inclusion (DEI) officer position. This was pursuant to the requirements of Texas Senate Bill (SB) 17, which prohibits DEI offices and the employment of personnel who perform DEI-related duties.

At that time, I shared ongoing review by the Offices of General Counsel and Talent Engagement regarding implications of the new law and their work to identify any additional adjustments necessary for HCCS’s for compliance with SB17. As a result of this review, HCCS is now sunsetting the DEI Council effective immediately.

Your work as a Council has been instrumental in fostering an inclusive and belonging environment within our organization. The dedication and efforts of each council member have contributed to our progress in becoming the “Employer of Choice” for faculty and staff, and the “College of Choice” for students. It is important that we support a welcoming environment where everyone feels respected and appreciated, and we remain committed to upholding these principles.

I want to express my appreciation to each member of the DEI Council for your invaluable contributions and unwavering commitment. Thank you for your understanding, cooperation, and for being an integral and valued contributor to HCCS’s success.



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Institution: Howard College
Date Submitted: 08/14/24
Pages: 9

**BOARD OF TRUSTEES
HOWARD COUNTY JUNIOR COLLEGE DISTRICT
1001 BIRDWELL LANE
BIG SPRING, TEXAS**

EXECUTIVE SESSION/REGULAR MEETING
TIME: 11:00 a.m. Executive Session
11:45 a.m. Lunch – Tumbleweed Room
12:30 p.m. Regular Meeting
DATE: Monday, April 29, 2024
PLACE: Board Room/Student Union Building
and By Telephone
USA Toll-Free: 1-888-204-5987
Access Code: 3148424#
(See more details below)

AGENDA

Howard College will convene as posted to consider and take formal action, if necessary, on the following agenda items:

I. CALL TO ORDER

II. EXECUTIVE SESSION (Personnel/551.074)

- A. Personnel Matters

III. RECONVENE

- A. Invocation
- B. Recognition of Guests

IV. COMMUNICATION TO THE BOARD

V. APPROVAL OF ROUTINE MATTERS

- A. Minutes of Regular Meeting held on March 25, 2024
- B. Financials for March 2024
- C. Monthly Reports of Auxiliary Services
- D. Personnel Matters
- E. Internal Audit Report

VI. UNFINISHED BUSINESS

VII. NEW BUSINESS

A. Visioning/Future Directions

1. District

- a. Facilities Master Plan 2024 Update
- b. Scheduling of Focused Meetings
- c. Howard Central Appraisal District Reappraisal Plan 2025-2026 and Public Hearing

d. Senate Bill 17 Update

- 2. Big Spring
 - a. Emergency Medical Services Program
- 3. Lamesa
- 4. San Angelo
- 5. SWCD
 - a. Marketing/Recruiting Update

B. Performance Measures/Outcomes

- 1. Access
 - a. Rural Promise

2. Student Success
 - a. Small Class Report
3. Community and Workforce Development
4. Performance Excellence
 - a. Student Roundtable Reports
 - b. Quarterly Investment Report

C. Monitoring

1. Purchasing
 - a. Update on RFP #24-005 Software Consulting for Thesis CAMS Enterprise System Software
2. **Handbook and Catalog Changes**
3. Faculty Contracts
4. Faculty Retirement Resolution
5. Professor Emeritus Nomination
6. Memorandums of Understanding with College Foundations
7. Construction/Renovation Projects
 - a. SWCD Residence Halls/Dental Lab Technology (DLT) Lab Update
 - b. San Angelo Electrical/Plumbing Lab Update
8. President's Report
 - a. Upcoming Activities
 - b. Recognitions

D. Board Education and Development

1. Legislative and General Updates

2. Board Training
 - a. Community College Association of Texas Trustees (CCATT) Conference/September 12-14/Amarillo
 - b. Cybersecurity Training

E. Meeting Evaluation and Future Agenda Items

VIII. CHAIR'S REPORT

IX. ADJOURNMENT

EXECUTIVE SESSION: There may be an executive session to discuss litigation, property, gifts, personnel, security, or economic development negotiations pursuant to Government Code Section 551.071, 551.072, 551.073, 551.074, 551.076, 551.087.

The Board of Trustees, administration, and guests gather for lunch at 11:45 a.m. on the day of the Board meeting in the Tumbleweed Room in the Student Union Building on the Howard College campus. This is a social function unrelated to public business with no deliberation of items listed on the agenda.

The meeting will be called to order at 11:00 a.m. for an Executive Session and 12:30 p.m. for the Regular Meeting. To listen to the meeting beginning at 12:30 p.m., call the following number:

Join the conference call for audio:

USA Toll-Free: 1-888-204-5987

Access Code: 3148424#

Related documents are available on the Howard College website at <https://howardcollege.edu/home/about/board-of-trustees/>.

Prior to two minutes before the call to order at 12:30 p.m., your phone will be automatically muted when you join the meeting and music will be playing. A short overview of procedures will be given prior to the start. Phones will then be muted for the meeting to begin. Opportunity will be given for public comment. Recording will be available on the website after the meeting.

Policy: 1.14 Senate Bill 17 Relating to Diversity, Equity and Inclusion

Adoption Date: April 29, 2024

Effective January 1, 2024, Senate Bill 17 (SB 17) prohibits community colleges from engaging in certain diversity, equity, and inclusion (DEI) initiatives, with limited exceptions.

Following the intent of the law and legal guidance, this policy will supersede any other policy as the college continues to review its policies, procedures and practices and receives further updates relative to the new law and evolving legal guidance.

Restrictions contained in the law:

1. 'Diversity, equity, and inclusion (DEI) offices are prohibited.
2. Performing the duties of a DEI office is prohibited.
3. DEI statements are prohibited.
4. Giving preference on the basis of race, sex, color, ethnicity, or national origin is prohibited.
5. Mandatory DEI trainings are prohibited.
6. State appropriations may not be spent in violation of SB 17.

Engaging in prohibited conduct may lead to appropriate discipline, including termination.

Employees may refer to the Howard College Working Guidance document ([click here](#)) for more information.

From: Dr. Cheryl Sparks
Sent: Tuesday, April 30, 2024 3:55 PM
To: 'Jeff Criminger' <Jeff.Criminger@sao.texas.gov>; 'jfreeman@ceram-kote.com' <jfreeman@ceram-kote.com>
Cc: Jennifer Brantley <Jennifer.Brantley@sao.texas.gov>
Subject: RE: State Auditor's Office - Senate Bill 17: Request for Information

Dear Mr. Criminger,

In an effort to hopefully make this expedient for you and to include other parties, I have embedded the answers in red to the questions in your email below and included appropriate documents as part of this response. If you need anything else from Howard College, please let me know.

Sincerely,

Cheryl T. Sparks

Cheryl T. Sparks, Ed. D.

President

Howard College

1001 Birdwell Lane

Big Spring, TX 79720

432.264.5030 Office

432.263.3888 Cell



From: Jeff Criminger <Jeff.Criminger@sao.texas.gov>
Sent: Wednesday, April 17, 2024 12:43 PM
To: 'jfreeman@ceram-kote.com' <jfreeman@ceram-kote.com>
Cc: Dr. Cheryl Sparks <CSPARKS@howardcollege.edu>; Jennifer Brantley

<Jennifer.Brantley@sao.texas.gov>

Subject: State Auditor's Office - Senate Bill 17: Request for Information

This email was sent from outside of Howard College. Please be cautious, think before you click!

Howard College IT Department

Good afternoon,

Senate Bill 17 (88th Legislature, Regular Session) directs the State Auditor's Office (Office) to conduct a compliance audit of each institution of higher education (Institution) to determine whether the Institution has spent state money in violation of Texas Government Code, Section 51.3525. Below you will find a list of questions that will allow our Office to begin developing our procedures to address Senate Bill 17.

1. Has the Institution's governing board (Board) created specific policies, procedures, or guidelines to ensure that state funds are not spent in violation of Senate Bill 17 (SB17)? If so, please provide them.

As part of the Howard College Board of Trustees monthly Board meetings, I provide an update on legislative activities as part of the Trustees ongoing Board Education and Development in a standing agenda item (see agenda attached with specific sections in red that will be referenced in this response). This bill as well as many others are shared as appropriate throughout legislative sessions and then upon passage. At the April 29th Board meeting (reference the attached agenda), the Board was given a more detailed update on Senate Bill 17 (see attached information provided as part of the presentation). This information was provided prior to the approval of a policy under a standing agenda item specifically designed for Handbook (employees and student) and Catalog changes (reference the attached agenda). The Board approved the attached policy during that section of the meeting to provide operational guidance which also included a link to a document to be used for guidance for employees and students as appropriate (see attached working guidance document). The Board was informed that this legislation continues to be interpreted and guidance is being provided which the college will integrate accordingly.

I also shared with the Board that we have been discussing internally if there were any concerns with any of the requirements contained in SB17. Our Chief Human Relations Officer/Rhonda Kernick who manages our training program had reached out to Vector Solutions which is the company that provides online training modules for our employees and students. We wanted to ensure that Vector Solutions was aware of the requirements of SB17. Attached you will find an email from Rhonda Kernick to me with the embedded answer from Vector Solutions indicating they had no concerns of

conflict with SB17 requirements in our training module selections. However, we will review the training modules again prior to module selection for future training periods in January and February of each year for current employees or for training upon employment during other times of the year.

2. Who would be the best point(s) of contact at the Institution for matters related to overseeing compliance with SB17?

Cheryl T. Sparks, Howard College President, csparks@howardcollege.edu, 432-264-5030 or 432-263-3888/cell.

3. Does the Institution's internal audit function intend to audit, or plan to review, the Institution's compliance with SB17?

Yes, Steve Smith/Chief Business Officer and Internal Auditor will perform this function. ssmith@howardcollege.edu

4. Will the Board or its designee certify to the Legislature and the Texas Higher Education Coordinating Board by August 31, 2024, that the Institution is in compliance with SB17?

Yes, that is the plan. As part of the president role, I will submit the required certification by that date. In the meantime, we will continue our efforts to discover any possible oversights of conflicts with the law and make appropriate adjustments by the deadline unless something is discovered close to the submission date that we inadvertently missed which will take some review. If that happens, we will notify you accordingly as we address it.

Please respond by **April 30, 2024**. After we have received and reviewed the responses to these questions, we may follow-up with your Institution's point of contact.

Senate Bill 17 also directs our Office to adopt a schedule to ensure that each Institution is audited at least once every four years. Currently, your Institution is not scheduled to be audited for compliance with Senate Bill 17 in fiscal year 2025.

Thank you in advance for your prompt attention to this request.



Jeffrey Criminger, CFE
Managing Senior Auditor

1501 N. Congress Avenue
Austin, Texas 78701

☎ 512-936-9590

Integrity. Judgment. Independence.

This message contains information which may be an audit working paper and/or may be confidential, privileged, or otherwise exempt from the requirements of the Public Information Act. Please contact the State Auditor's Office at publicinformation@sao.texas.gov if this email message or any associated attachments are requested, or are part of documents responsive to a request, under the Public Information Act.

ELECTRONIC SIGNATURE ACKNOWLEDGEMENT AND CONSENT FORM

I, John FREEMAN, agree and understand that by signing the Electronic Signature Acknowledgment and Consent Form, that all electronic signatures are the legal equivalent of my manual/handwritten signature and I consent to be legally bound to this agreement. I further agree my signature on this document is as valid as if I signed the document in writing. This is to be used in conjunction with the use of the electronic signature for the submission of the SB17 Annual Certification required by 51.3525(e) that I elected to have signed electronically. Under penalty of perjury, I herewith affirm that my electronic signature was signed by myself with full knowledge and consent and am legally bound to these terms and conditions.

Dr. John Freeman
Signature

8-12-2024
Date

Please check one:

- President
 Board Chair

ELECTRONIC SIGNATURE ACKNOWLEDGEMENT AND CONSENT FORM

I, Cheryl T. Sparks, agree and understand that by signing the Electronic Signature Acknowledgment and Consent Form, that all electronic signatures are the legal equivalent of my manual/handwritten signature and I consent to be legally bound to this agreement. I further agree my signature on this document is as valid as if I signed the document in writing. This is to be used in conjunction with the use of the electronic signature for the submission of the SB17 Annual Certification required by 51.3525(e) that I elected to have signed electronically. Under penalty of perjury, I herewith affirm that my electronic signature was signed by myself with full knowledge and consent and am legally bound to these terms and conditions.

Cheryl T. Sparks
Signature

8/7/24
Date

Please check one:

- President
 Board Chair