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City College of San Francisco's Response to the Written Report

Submitted by:
City College of San Francisco
50 Phelan Avenue, San Francisco, CA 94112

To:
Accrediting Commission for Community and Junior Colleges Western Association of Schools and Colleges

June 26, 2015

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Introduction

In 2013, the People of the State of California, filed a lawsuit against the Accrediting Commission for Community and Junior Colleges (ACCJC) asserting various violations of state and federal law. Following a trial in 2014, Superior Court Judge Karnow found that ACCJC violated CCSF's due process rights by not allowing CCSF to respond to alleged deficiencies that had never been identified by the visiting team. The Final Injunction and Judgment issued by Judge Karnow on February 17, 2015, in pertinent part, provides as follows:

"ACCJC must prepare a written report that clearly identifies any deficiencies in City College's compliance with accreditation standards as of June 2013(Written Report). For each such deficiency, the Written Report must set forth the evidence as of June 2013 which supported the finding of deficiency… CCSF should provide a written response to the Written Report within 80 calendar days of receipt of the Written Report."

Any fair evaluation of CCSF based on all the evidence available to ACCJC must lead to a conclusion that CCSF's level of compliance, while not fully meeting all standards, was not so far out of compliance that the college should have been terminated. ACCJC, through this injunction process, has been given the opportunity to correct the grievous error it made in 2013.

Factual Background

Until 2012, CCSF's accreditation was reaffirmed during every comprehensive evaluation through 2006. As of 2012, CCSF was not under sanction by ACCJC. CCSF's status as one of California's, and the nation's, premier community colleges, had until the 2012 sanction, never been questioned by ACCJC. Prior to 2012, a visiting team had not been to CCSF since 2006. The 2006 visiting team recommended affirmation of accreditation without a follow-up visit. When comparing this outcome to the actions taken on other colleges in and around 2006, this was an exemplary outcome. Most other colleges either were placed on sanction or required a follow-up visit on specific recommendations. ACCJC found that "The visiting team validated that

Despite the indisputable absence of any findings of CCSF non-compliance with the Standards and Eligibility Requirements in 2006, or in any Commission actions between 2006 and 2012, the Commission's July 2012 decision treated the recommendations made for quality improvement as deficiencies, and incorrectly alleged that the College had not adequately addressed these concerns. ACCJC acted in excess of its authority when it treated the recommendations for "quality improvement" as mandatory and used them as a large part of the justification for the decision to issue a show cause sanction on CCSF. The Commission cannot require institutions to comply with criteria in excess of their own stated Standards and Eligibility Requirements; this is supported by 34 CFR§602.18(c) which declares that to meet federal regulations an accrediting agency, "bases decisions regarding accreditation and pre-accreditation on the agency's published standards."

This has been confirmed by the US Department of Education (USDOE). USDOE in its August 13, 2013 letter to ACCJ underlying behavior is directly tied to a failure to meet the standards.” This is an extremely important finding of law by the court that impacts ACCJC’s approach to reconsideration.

CCSF has pointed out to ACCJC that the period of time CCSF was placed on show cause in July

Eligibility Requirements, Accreditation Standards and Commission policies, but has recommendations on a small number of issues of some urgency." The Review Team concluded that CCSF met the standards at issue, even though there was still more work to do in certain cases. Thus, the Review Team found that CCSF was in substantial compliance. ACCJC in 2013 and again in its Written Report is unwilling to recognize or even consider that CCSF was in substantial compliance. ACCJC takes the position that any lack of compliance must lead to a finding of noncompliance with a standard. There is no basis for such a conclusion, legal or otherwise.

In other cases in which ACCJC placed institutions on show cause, institutions were not held to a requirement that there must be full compliance with all standards in order to avoid termination. For example, Cuesta College was placed on Show Cause in 2012. The following year, following a visit by a review team, Cuesta was placed on warning, a status applied to an institution that is not in compliance with the Standards. Thus, it is not ACCJC's policy that a college on show cause must demonstrate full compliance or be terminated. It is permissible, and probably very appropriate, for an institution to move from show cause to a lesser sanction. This injunction process provides ACCJC with the option to revise its 2013 decision to achieve that result..

ACCJC's Written Response does not Comply with the Final Injunction and Order

According to the Final Injunction and Order:
"ACCJC must prepare a written report that clearly identifies any deficiencies in City College's compliance with accreditation standards as of June 2013(Written Report). For each such deficiency, the Written Report must set forth the evidence as of June 2013 which supported the finding of deficiency… CCSF should provide a written response to the Written Report within 80 calendar days of receipt of the Written Report."

ACCJC has not presented evidence. Instead, ACCJC has simply submitted the Visiting Team Report from April 2013 that found CCSF to be in compliance with most of the standards and did not recommend termination. ACCJC then added a conclusory statement that ACCJC did not follow the visiting team recommendation. Proper evidence was not provided; instead, ACCJC simply concluded that the Visiting Team's findings and recommendations were wrong. This meets neither the spirit nor the letter of the Final Injunction and Order.

ACCJC often promotes "a culture of evidence", yet ACCJC has failed to provide the quality or quantity of evidence it routinely requires of colleges. Because ACCJC did not submit evidence as required by the court, it is difficult for CCSF to submit a complete response and CCSF cannot properly contest ACCJC's conclusions. In many cases, ACCJC cannot even discern what the

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institution must improve to achieve compliance or on how it can improve if compliance has

2012 critical of then-existing governance processes. CCSF had a fully-established governance process in place, but in response to the 2012 Show Cause Order, the governance process was disbanded and started anew. ACCJC, having caused the dissolution of the pre-existing governance process, cannot reasonably conclude that the newly created process is flawed because it has been in existence a relatively short time. This is patently unfair and unreasonable and should not be considered in a termination proceeding.

In the 2012 Report, the visiting team considered Standard I.B and all of the sub-parts of that standard in one section, without clearly delineating the college's compliance with each separate sub-part (see the 2012 Report, pages 24-29). However, a review of that section in the 2012 report shows clearly that CCSF had in place substantial procedures and did in fact implement those procedures for maintaining "an ongoing, collegial, self-reflective dialogue about the continuous improvement of student learning and institutional processes."

Right at the start, this section of the 2012 Report, under the heading, "General Observations," stated the following (2012 Report, page 24):

"City College of San Francisco has several venues in which dialogue related to improvement and institutional effectiveness is expected. The Board of Trustees ha-14 (s)2 s

parentheses at the end of this recommendation, the Report listed 19 different standards by number only, inc

Broadcast Electronic Media faculty dialogue on student learning and institutional processes.
http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/ScreenShot_2015-06-18_at_10-58-12_AM.pdf
This screenshot of the information for for each electronic files provided proving SLO Updates/Revisions/Discussion for our Audio Program in BEMA. This pdf shows the original dates of 2011 for the revisions to the courses discussed in the error of fact, noted above.

http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/Sound-Recording-DANA_REV_Cert_of_Accompl_SMC.pdf

http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/Sound-Recording-revise-1_Cert_of_Accompl_SMC.pdf

http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/BCST126-revise-1_SMC.pdf

http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/Live_Sound_Cert_MAP_of_SLO_091212.pdf

http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202009-2010/BEMAPR09-10.pdf

Approved by Academic Policies Committee 2010 Feb22 http://www.ccsf.edu/Offices/Shared_Governance/pdf/mapc0210.pdf
Approved by Academic Senate Executive Council 2010 April 7 http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_S10/AsMin20100407.pdf
Approved by Board (as part of Resolution S6) 2010 May 27 http://www.ccsf.edu/dam/Organizational_Assets/Department/BOT/BOT_Minutes_2010/May272010min.pdf
Honorary Degrees for WWII Internees
Discussed by Academic Senate Executive Council 2010 April 21 (see President’s report) http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_S10/ASminutes20100505.pdf
Approved by Academic Policies Committee 2010 April 26 http://www.ccsf.edu/Offices/Shared_Governance/pdf/mapc0410.pdf

Approved by Board (Resolution S4) 2010 April 29 http://www.ccsf.edu/dam/Organizational_Assets/Department/BOT/BOT_Minutes_2010/apr292010_min.pdf

Waiting List Policy

Drafted by Registration and Enrollment Subcommittee during 2010 Fall (cf. chair D. Alioto for evidence)

Approved by Academic Policies Committee 2010 November 15 http://www.ccsf.edu/Offices/Shared_Governance/pdf/mapc1110.pdf

Approved by Academic Senate Executive Council 2010 December 1 http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_S11/20101201MinutesOfficial.pdf

Implemented thereafter by A&R (cf. Dean Leyba for evidence)

Study Abroad in Asia and Cuba

Developed by International Education Advisory Subcommittee during 2010- (cf. Study Abroad Coordinator Jill Heffron for evidence)

Approved by Academic Policies Committee 2011 March 21 http://www.ccsf.edu/Offices/Shared_Governance/pdf/mapc0311.pdf

Approved by Board (Resolutions B11 and B12) 2011 April 28 http://www.ccsf.edu/BOT/minutes%20PDF/2011/April_28_2011_minutes.pdf

2011 Perkins Allocation

Approved by Academic Policies Committee 2011 May 16 http://www.ccsf.edu/Offices/Shared_Governance/pdf/mapc0511.pdf

Approved by Academic Senate Executive Council 2011 May 18 http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_F11/AsMin20110518.pdf

Allocation made thereafter (cf. Workforce Education Dean for evidence)

New General Education Courses

Recommended by Bipartite Committee on Graduation Requirements 2010 November 3 http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_F10/AsMinBip20101103.pdf and 2011 February 23 http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_S11/AsMinBip20110223.pdf

Approved by Board in Catalog (as part of Resolution S4) 2011 April 28 http://www.ccsf.edu/BOT/minutes%20PDF/2011/April_28_2011_minutes.pdf

Strategic Planning Process

Presentation to various committees throughout 2010-2011, e.g., Academic Policies Committee 2010 September 20 http://www.ccsf.edu/Offices/Shared_Governance/pdf/mapc0910.pdf and Planning and Budgeting Council 2010 November 2 http://www.ccsf.edu/Offices/Shared_Governance/pdf/mpbc110210.pdf

Much discussion in Academic Senate Executive Council throughout 2011-2012, e.g., 2011 August 24 http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_F11/AsMin20110824.pdf

2011-2012 Budget

Presentations to Planning and Budgeting Council throughout 2010-2011, e.g., 2011 May 17
http://www.ccsf.edu/Offices/Shared_Governance/pdf/mpbc051711.pdf
Adopted by Board (Resolutions B1 and B1a) 2011 June 23
http://www.ccsf.edu/BOT/minutes%20PDF/2011/june_23_minutes.pdf

13. Student Development Division SLO discussion.
STUDENT DEVELOPMENT DIVISION
-
spreadsheet summary of efforts to meet standard set in Student Development Mission Statement.
Phase 2 = 7/2010 to 12/2011

MATRIX
spreadsheet summary of SLO & ALO outcomes and progress to date. – 9/24/2012
Note: This matrix is online and is referred to in the 2012 Program Review (pg. 4 bottom), which is included in the Annual Program Review section of this binder.

ANNUAL PROGRAM REVIEW
Fall 2012 - Detailed discussion of SLO activities starts on pg. 4.
2010-2011 - Detailed discussion of SLO activities starts on pg. 2, item 3
2010 – Detailed discussion of SLO activities pg. 3, item 6 and pg. 7, Attachment A.
2009 - Detailed discussion of SLO activities 3rd page (no page numbers), item 5.
NOTE: These Program Reviews are excellent examples of planning with unit plans linked to school's Strategic Plan, etc.

STUDENT HEALTH SERVICES SLO WEBSITE
Screen shots of website 2012 & 2013. Includes some Program Review material, but also SLO summaries.

SLO ACTIVITY HIGHLIGHTS & GENERAL SLO INFORMATION
Fall 2012 assessment review and plans for 2013.

EARLY SLO DATA 2007– 2008

Theatre Department discussions on SLO's.

AMATERIALS IN POUCH FRONT OF BINDER
Excellent– 13" X 22" hand written spread sheet summary of SLO status of every course in the department.

Excellent- Summary of ThA “Course Programs & Outcomes” for entire department

COMPLETED SLO ACTIVITIES
Detailed summary of all ThA courses. Individual sheets on John Wilk’s classes. Downloads from website. (8/2012)

PLANNED SLO ACTIVITIES
Plans for John Wilk’s classes (8/2012). Downloads.

PROGRAM SLOs
Evidence of planning. (8/2012)
Department survey listing status of all courses. Downloads.

PROGRAM OUTCOMES
Evidence of planning. Memo from Gloria, chair, about “the meeting yesterday.”
Also duplicates of John Wilk’s SLO reports paper clipped in the front pouch.

THA G.E.D. “E”
Downloads from 8/2012.

Standard I.B.2: The institution sets goals to improve its effectiveness consistent with its stated purposes. The institution articulates its goals and states the objectives derived from them in measurable terms so that the degree to which they are achieved can be determined and widely discussed. The institutional members understand these goals and work collaboratively toward their achievement.

The Review Team found:

Findings and Evidence:
The revised planning process results in measurable goals and objectives stated in measurable terms. The rubric used by School Deans and Supervisors to rate resource requests developed through the program review process includes the alignment of objectives with the college priorities, the degree to which the request is based on measurable outcomes, and a data-informed rationale for the request. The use of this rubric was evident in the prioritized resource request lists developed by each area of the college.
The Board of Trustees has adopted strategic priorities for the college that provide measurable goals for the college. The priorities were developed based on a review of substantial data, including internal and external environmental scans. These college priorities were developed through a data-based approach that included data on state policies, the characteristics of the CCSF student body, and student achievement. This information was provided in a document entitled "Data to Inform Discussion of Board Planning Priorities for Fiscal Year 2013-14," by the Office of Research and Planning.

The Board Priorities adopted for 2013-14 are as follows:

1. .Put students first by using data related to student needs to set priorit ies for distribution of resources.
2. Continue to implement and assess strategies to close student achievement gaps for identified underrepresented groups.
3. Strengthen excellence in teaching, learning, and support services through a focus on student learning outcomes, student achievement, and student goal completion.
4. Implement all the actions included in the Accreditation reports of October} 5, 2012 and March 15, 2013 to ensure City College of San Francisco retains its accreditation.
5. Meet the base FTES goal in as cost effective way as possible.
6. Focus on increasing productivity in all FTES generating programs.
7. Secure outside partners wherever possible and cost-effective to assist in select non credit offerings.
8. Use the program review process to identify programs that need to grow or are in decline.
9. Reduce the cost of faculty non-instructional costs.
10. Reduce expenditures wherever possible in order to achieve fiscal stability.

The Board Priorities were widely disseminated and used to foster engagement in all aspects of institutional planning. Program reviews demonstrate the alignment of college programs with these priorities.

The revised planning process has simplified and clarified the measures used as a scorecard to evaluate overall college effectiveness. Rather than complex and voluminous end-of-year reports that were generally not well understood, the college now uses the Accountability Report for Community Colleges 2.0 Scorecard (ARCC 2.0) metrics as the core indicators of college effectiveness for broad-based dialogue. ARCC metrics are available to the college community on the college website. For example, the student success page of the college website has ARCC data links. Using the ARCC 2 Scorecard will allow a college discussion of a set of metrics that can be used to focus on specific targets for improvement and for benchmarking. Additional dashboard indicators will be added as needed.

The overall richness of available data has not been lost, as additional data is provided for each department as part of the program review process and on request for other college needs. Information on noncredit students and selected indicators for annual planning are available. Data used as part of program review includes department productivity; department demographics; department success rates; program awards; tracked data from student services contacts, activities, lab use, and demographics; current enrollment (updated daily); college-wide comparisons;city and county comparisons; student survey results; and employee survey results. This data is available to the college community from links on the program review web page. Use of this data is evident in the program review forms submitted from across the college.

“[H]owever, the development of metrics related to the achievement of Annual Plan goals and objectives has been delayed. End-of-Year Assessments have not be available for recent years. Production of the End-of-Year Assessments was delayed while the new Strategic Plan and related Annual Plan were developed. An End-of-Year Assessment is being prepared for 2011-12 (I.B.2).”

Those concerns do not address compliance with Standard I.B.2. “Metrics,” if they are something other than “measurable terms,” are not required by the standard. Delays in stating some measurable terms do not constitute a defect in compliance if other objectives are stated in measurable terms, unless the delays affect too many of the goals and objectives. The standard does not require “End-of-Year Assessments.”

The third and last sentence in the standard requires that the members of the college community work collaboratively towards the achievement of the goals and objectives. Nowhere does the 2012 Report assert any shortcomings in this regard. On the contrary, from the numerous words of praise that the report gives to the college in its discussion of Standard I.B., it may be inferred that the college members worked collaboratively to achieve the goals and objectives, and that this remaining sentence in the standard was also satisfied. (Pages 24-28)

In its conclusion for this section, the 2012 Report determined that CCSF partially met Standard I.B.

and Budgeting Council approved the new annual Program Review System, with plans to keep improving it in years 2010 and 2011 (evidence: PBC minutes August 25, 2008; February 12 and May 5, 2009). The new program review cycle culminating in the College Budget was described on page 31 of the Focused Midterm Report of 2009. http://www.ccsf.edu/ACC/Accreditation%20Midterm%20Report%20%20031309.pdf

Regardless of that challenge, a general level of planning integration continued to be maintained by the requirement that all units at the college cite the Annual Plan and other college plans in drawing up unit objectives linked to college level planning and board priorities. As program review became annual, budget requests of the units/cost centers continued to be evaluated for funding under the leadership of the chancellor and vice chancellors, with chair and participatory governance input, based on college priorities and resource constraints at the time. In fact, at the October 5, 2010 deans' meeting, deans asked when they would see federal 231 grant money allocated via program review also. (#4 of VCCA deans meeting minutes Deans mtng 10-15-10.doc)

The planning schedule was developed put together in such a way so as to promote integration

successful implementation. The record does not support the claim. The comments about lack of a track record, cited by the Commission as having been included in the 2013 Report, may have been in the Report in connection with other Standards, but the Report did not make those comments in connection with Standard I.B.3. The 2012 Report found no deficiency in CCSF's compliance with Standard I.B.3. The 2013 Report noted that CCSF had adopted procedures that were improvements over the already adequate system in place in 2012. It would be an abuse of discretion for the Commission to hold CCSF out of compliance with Standard I.B.3 merely because these improvements had not been in place long enough to have a track record of successful implementation.

Accordingly, the Commission is respectfully requested to revise its determination and conclude that City College meets this standard.

Additional Evidence

1. Foreign Language Department on Program Review

http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202009-2010/APRF2008_09Blank.pdf
Foreign Languages Dept Program Review; links:
2008-09:http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202009-2010/ForLangPR09-10.pdf

http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202009-2010/APRF2009_10Blank.pdf
FL Dept PR 2012-2013 cites linkage to Board Planning Priorities:
http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202011-2012/ProRev/LiberalArts/FORL_PR12.pdf
"

Standard II.A.6 The institution assures that students and prospective students receive clear and accurate information about educational courses and programs and transfer

- There is widespread institutional dialogue about the results of assessment and identification of gaps.
- Decision-making includes dialogue on the results of assessment and is purposefully directed toward aligning institution-wide practices to support and improve student learning.
- Appropriate resources continue to be allocated and fine-tuned.
- Comprehensive assessment reports exist and are completed and updated on a regular basis.
- Course student learning outcomes are aligned with degree student learning outcomes.
- Students demonstrate awareness of goals and purposes of courses and programs in which they are enrolled.
-
- Based on CCSF's March 2013 self-assessment report on SLOs and the ACCJC evaluation of that report by Krista Johns (ACCJC), CCSF met or exceeded the minimum level (score of 3, 4, or 5) in all these standards except for two areas:
- Score of 1 [illegible]

2000-2004 outlines	197	7.5
2005 outlines forward	2013	76.9

Evidence:
http://instruction.ccsf.edu/InstructionalSLOReportsSpring2013/course_slo_overview.php
.
Evidence:
http://www.ccsf.edu/dam/Organizational_Assets/About_CCSF/outcomes_assessmeccjc_slo_report/evidence/MemoOutlineCurrency2012-12-03.pdf
Evidence:
http://www.ccsf.edu/dam/Organizational_Assets/About_CCSF/outcomes_assessment/accjc_slo_report/evidence/UpdatingCourseOutlinesMemoBoegel.pdf
While comparisons are difficult, it appears CCSF was being held to a higher standard than other colleges in the region. For examplemyacolleges still do not have their SLOs in the official course outline of record. They store them in their reporting software and change them regularly. ACCJC seemed to conclude th(l)-t60 (f4 (n)4 (s)-1 (4 (56l)-2 (d (ona)4 (lur)3 (s (ude)4)4 (m)-2 (2 (a)44

https://sites.google.com/site/someccsfenglishstuff/home/outcomes/PortfolioAssessment Data-ThoughtsF06-11.pdf?attredirects=0&d=1
ENGL 1A/961A Outcomes Assessment Rubric and Process
https://www.dropbox.com/s/pnm5m4wjzlzuih7/1A%20and%20961A%20Holistic%20Scoring%20Report%20May%202011.doc?dl=0
ENGL 1A/961A Scoring Data
https://www.dropbox.com/s/x8a7ppp282e77iz/1A%20and%20961A%20Essay%20Scoring%20Data%20May%202011.doc?dl=0
Other Pre-2012 CQI documents related to outcomes assessment
Student feedback on course sequence and pathways
https://sites.google.com/site/someccsfenglishstuff/home/outcomes/Engl%20Dept%20Research%20Brief-Student%20Survey%20May%202010.pdf?attredirects=0&d=1
ENGL L readiness
https://sites.google.com/site/someccsfenglishstuff/home/outcomes/English%20L%20Student%20Success%20Baseline%20Indicators%20Fall%2006-Summer%2011.pdf?attredirects=0&d=1
6/18/2015 15:15:49
English
https://sites.google.com/site/someccsfenglishstuff/labdocs/12-12-11RPsiterates.pdf?attredirects=0&d=1
https://sites.google.com/site/someccsfenglishstuff/labdocs/rpascoresf09-f10.pdf?attredirects=0&d=1
https://www.dropbox.com/s/ckbn5nkxwm1cya3/RPratelevels5-27-11.pdf?dl=0

Here is an example of a 2012-13 document based on Reading Plus data that the Department would use for CQI: https://www.dropbox.com/s/xvok2iqzabo6c8i/sp12-f13-rpa-comparison.pdf?dl=0

The Department has continued to use Reading Plus data to analyze relationship between Reading Plus progress and student success and has tried to improve learning outcomes and increase student and teacher motivation with friendly competition, as shown in documents such as these, stored in the Department's Dropbox—another form of technology that English has used

http://www.ccsf.edu/en/about-city-college/participatory_governance/academic-senate/accreditation.html
6/19/2015 4:30:53

1. http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/ScreenShot_2015-06-18_at_10-58-12_AM.pdf
This screenshot of the information for for each electronic files provided proving SLO Updates/Revisions/Discussion for our Audio Program in BEMA. This pdf shows the original dates of 2011 for the revisions to the courses discussed in the error of fact, noted above.

2. http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/Sound-Recording-DANA_REV_Cert_of_Accompl_SMC.pdf

3. http://www.ccsf.edu/dam/ccsf/images/mN/A_So
und-
noted above.

3.

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changes in this area (Page 69-70). Standard II.B.4, however, does not require that changes be fully implemented – it requires only that CCSF evaluate its student support services and use the results of the evaluation as the basis for improvement.

In its discussion of Standard II.B.4, the 2013 Team Report did not say that there was "lack of a needs assessment related to student support services at the eight centers and main campus." The 2013 Report made the substance of that observation under Standard II.B.1. However, read in that context, the observation demonstrates that CCSF complied with Standard II.B.4. It does not support a finding of failure to comply
In its discussion of Standard II.B.4, the 2013 Team Report also did not say there was a shortage of technology resources for student support services. The 2013 Report made the substance of that observation under Standard I.B.3. However, read in that context, the observation demonstrates that CCSF complied with Standard II.B.4. It does not support a finding of failure to comply.
In its discussion of Standard II.B.4.and Recommendation 5, the Team Report found that CCSF had made significant improvements under this Standard. There is no evidence to support ACCJC's finding to the contrary.
The 2013 Team Report found that only 28% of the student support service departments had "closed the loop" on the SLO process for continuous quality improvement. Again, however, Standard II.B.4 does not require that the SLO loop be closed. All that this standard requires is that CCSF evaluate its student support services and use the results as the basis for improvement. Therefore, the 28% statistic relied on by the Board does not support its conclusion that CCSF did not meet this standard.
ACCJC reaches its conclusion without providing evidence to support its determination. Furthermore, ACCJC referred to other sections of the report to find noncompliance with this standard. ACCJC referred to II.B to find that comprehensive review is needed, II.B.3 regarding technology problems and II.B.4 for SLO issues. While the various standards are interrelated, when presenting evidence of the violation of a standard to justify termination of an institution, it is reasonable to expect ACCJC to find evidence within the standard. ACCJC didn't do this. Instead it cobbled together findings that already are being used to support noncompliance in other areas.
Standard II.B.4 requires that CCSF use the results of its evaluation as the basis for improvement. However, it does not require that changes recommended through the evaluative process be fully implemented. Implementation of improvements goes to the quality of student support services, and the quality of the services is judged under Standard II.B.1.

Furthermore, ACCJC improperly measured CCSF's level of compliance on SLO's. CCSF was not required to be at continuous quality improvement level for SLO's at that time. CCSF was required to to be at the proficiency level by having SLO's and assessing them. Based on the SLO rubric established by ACCJC, CCSF was working at an acceptable level in compliance with the standard as enforced at that time.

Accordingly, the Commission is respectfully requested to revise its determination and conclude that City College meets this standard.

<u>Additional evidence</u>

STUDENT DEVELOPMENT DIVISION
- Not every section of binder in relevant. Relevant sections of binder are listed below in the order they appear.

Excellent spreadsheet summary of efforts to meet standard set in Student Development Mission Statement. Phase 2 = 7/2010 to 12/2011

MATRIX
Excellent spreadsheet summary of SLO & ALO outcomes and progress to date. – 9/24/2012
Note: This matrix is online and is referred to in the 2012 Program Review (pg. 4 bottom), which is included in the Annual Program Review section of this binder.

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NOTE: These Program Reviews are excellent examples of planning with unit plans linked to school's Strategic Plan, etc.

STUDENT HEALTH SERVICES SLO WEBSITE
Screen shots of website 2012 & 2013. Includes some Program Review material, but also SLO summaries.

SLO ACTIVITY HIGHLIGHTS & GENERAL SLO INFORMATION
Fall 2012 assessment review and plans for 2013.

EARLY SLO DATA 2007– 2008

NOTE: Includes materials prepared for (e)4 (d f/MCID 7 >-2 (e)4 (s)- (pa)4 (r) 4 (r)3t.i)-2 (t)-<</MCID t

Standard III.B.1.a. The institution plans, builds, maintains, and upgrades or replaces its physical resources in a manner that assures effective utilization and the continuing quality necessary to support its programs and services.

Standard I.B.1.b. The institution assures that physical resources at all locations where it offers courses, programs, and services are constructed and maintained to assure access, safety, security,and a healthful learning and working environment.

The Visiting Team Report on III.B.1 provides:

Findings and Evidence:

The team toured the recently opened new location of the Chinatown/North Beach Center. The new facilities and environment appear safe, secure and well-maintained. The college's Public Safety Department provides on-site law enforcement and/or security services to the Chinatown/North Beach Center as well as the Ocean Campus and other designated centers and sites. A follow-up interview with the college Chief of Police and a review of its 2012 Annual Security Report and Crime Statistics 2009, 2010, 2011 supported the college's assertion of safe, secure and well-maintained facilities.

No deficiency was found during the March 2012 Evaluation Visit. No deficiency was found during the Show Cause Visit.

Conclusion:

The college meets the Standards.

The Visiting Team Report on III.B.1a and b provides:

Findings and Evidence:

The new Chinatown/North Beach Center and the remainder of the college facilities build-out were guided by the comprehensive 2004 facilities master plan and achieved through local bond measures and state matching funds. This facilities master plan was developed with the assistance of a facilities planning firm with experience in college master planning.

While facilities projects for repairs and maintenance were planned and physical resources under this section and found that the college met the standard. The Commission, however, evaluated the college's compliance using information the 2013 Report had considered under III.B.2.

The 2013 Team Report evaluated the current condition of CCSF's physical resources under the introductory paragraph in III.B.1. and stated: "No deficiency was found during the March 2012 Evaluation Visit. No deficiency was found during the Show Cause Visit." (Page 42).

The 2013 Report then evaluated CCSF's compliance with sub-paragraphs III.B.1.a and b. The Report noted that CCSF had earlier planned on completing facilities projects for repairs and maintenance based on the 2010 facilities condition assessment data. Sometime later, budget cuts called into question the adequacy of funding for these projects. However, the recent passage of the local parcel tax led the Board of Trustees at its meeting in February 2013 to approve "substantial funding" for these projects and concluded that this funding "should allow Building and Grounds to tackle the projects in the queue to improve physical resources." (Page 43). The Report concluded, "On that basis, the Report concluded that CCSF met these two sub-paragraphs and Standard III.B.1 as a whole. (Pages 42-43).

The 2013 Report also addressed CCSF's response to Recommendation 8. This recommendation included two parts. One part directed CCSF to incorporate all costs required to appropriately operate and maintain existing facilities into its annual and long-term planning and budgeting process. That recommendation spoke to the requirements of III.B.2. The other part directed CCSF to annually allocate the required staff and money to operate and maintain the college's physical resources. This part of the recommendation related to III.B.1.

The 2013 Report addressed only the first of those two recommendations. It discussed the College's progress in developing and using the total cost of ownership (TCO) model, and described it as a work in progress. This was relevant to III.B.2. (See 2013 Report, pages 43-44). The 2013 Report totally ignored the second part of the recommendation. Since the Report had already found that CCSF complied wd [(de)4 (s)6(d [(de)4 (s)6(d l)13 (-10 (B)or)3 (t)(pr)3 (o

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CCSF employs high-quality technology throughout the college.
http://www.ccsf.edu/Departments/English/labpage/labfit.pd
http://www.ccsf.edu/Departments/English/labpage/webresources.htm
http://www.ccsf.edu/en/educational-programs/school-and-departments/school-of-english-
foreign-languages/english/tutoring_technology.html
http://www.ccsf.edu/Departments/English/labpage/englishlab.html
http://www.ccsf.edu/Departments/English/labpage/
http://www.google.com/calendar/embed?src=bigklein%40gmail.com&ctz=America/Los_Angeles
https://www.google.com/calendar/embed?src=ik94cdjkjsqvvft83maaeouhms%40group.calendar.google.com&ctz=America/Los_Angeles

6/22/15 all of the workgroup updates are at this link: http://www.ccsf.edu/en/about-city-college/slo/update_archives.html

Standard III.C.2. Technology planning is integrated with institutional planning. The institution systematically assesses the effective use of technology resources and uses the results of evaluation as the basis for improvement.

The Team Report says:

During the March 2012 Evaluation Team Visit, the college was found to not comply with the Standard due to planning and budgetary practices, as well as the lack of technology funding. As discussed in Standard I.B.3, the college has assessed and revised its planning and budgeting processes and practices. Due to the availability of additional revenue from temporary state and local taxes, technology funding has been increased to address institutional priorities. CCSF now has a long-term revenue source available to fund new and replacement

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Show Cause Visiting Team found that implementation is very much a work in progress.The Show Cause Visiting Team also found that the evaluation and development processes, conducted over the last year were inclusive, reflecting broad engagement among all constituencies.

The revised governance structure is defined by two new Board Policies, one defining the Participatory Governance System, headed by a Participatory Governance Council with representatives from all constituencies, and the other defining the Collegial Governance System, which specifies the role and responsibilities of theAcademic Senate. The revised structures clearly define and promote participation in governance for all employee groups and students. However, as noted above, implementation is young, and, having held just three meetings of the Participatory Governance Council

thus far, the Show Cause Visiting Team found that no operating procedures or processes have been defined for the revised governance structure. The Show Cause Visiting Team was informed that defining operating procedures and processes is the immediate priority. The college's Show Cause Report presents detailed Actionable Improvement Plans, which specify planned steps for implementation.

Through interviews with constituency leaders, the Show Cause Visiting Team found that some participants believe thatdecisions affecting the college are rushed and too top down. Some also believe that instability in senior administration has led to some confusion in decision making and that interim administrators may not understand the culture of the college. However, all constituency leaders expressed hope and some confidence in the future and full implementation of the revised governance structures, noting that all are learning as they go. It was clear to the Show Cause Visiting Team

that all constituencies are sincerel

As previously explained, the governance system in place in 2013 was the direct result of ACCJC's 2012 evaluation and conclusion that CCSF's governance process needed to be restructured. ACCJC directed great energy in the months after the 2012 report to taking on and meeting this challenge. CCSF efforts are described above and were accepted by the Visiting Team. According to the Written Report ACCJC decided in 2013 that CCSF did not meet the Standard because inadequate time had passed. However, the lack of time was entirely within the control of ACCJC. ACCJC had allowed CCSF more time to demonstrate the effectiveness of its governance system, CCSF would have met even ACCJC's expectations.
It was clear to the Show Cause Visiting Team that "all constituencies are sincerely engaged in implementation of the governance structure and that they are working collaboratively to improve decision making."
It is inarguable that in June 2013, the PGC did not have a lengthy track record of successful governance. However, ACCJC notified CCSF in June 2012, for the first time, that the college's participatory governance processes did not comply with ACCJC standards. ACCJC has argued that notice was provided as early as 2006, but this position was soundly rejected by the court. Given that notice was not provided until June 2012, it is literally impossible to establish a record of success between June 2012 and the April 2013 show cause visit.

It is correct that that the PGC had been operating for a relatively short time. However, this is a direct result of ACCJC actions in 2012 critical of the existing governance processes. In 2012 CCSF had a fully-established governance process in place, but in response to the 2012 Show Cause Order, the governance process was disbanded and started anew. Examples of the effectiveness of the prior governance system are provided in the evidence below.

The old Shared Governance system was elegant, simple and it worked. It was not without some problems. For example there were too many subcommittees and some faculty circumvented the established structures. It may have needed some updates, reform and clarification but that is very different from total destruction of a system that had been developed, evaluated, updated, and reformed – and matured – over many years.

In response to the 2012 Show Cause Order, the previous governance process was disbanded and started anew. The pre-existing governance system was deemed to have met the standard by the 2012 Visiting Team and shows that CCSF was fully capable of implementing its governance system.

There is a link below to an Academic Senate report on Governance. Here are excerpts from that report with page references:

Thed, ees:

Much discussion in Academic Senate Executive Council throughout 2011-2012, e.g., 2011 August 24
http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_F11/AsMin20110824.pdf

2011-2012 Budget

Presentations to Planning and Budgeting Council throughout 2010-2011, e.g., 2011 May 17
http://www.ccsf.edu/Offices/Shared_Governance/pdf/mpbc051711.pdf

Adopted by Board (Resolutions B1 and B1a) 2011 June 23
http://www.ccsf.edu/BOT/minutes%20PDF/2011/june_23_minutes.pdf

Additional ACCJC Findings that Should Be Reconsidered

In addition, there are numerous instances in the original report where a conclusion of non-compliance was based on a judgment call that could reasonably have gone the other way because criticisms of CCSF's compliance were either minimal or possibly irrelevant to the standard. Often the Report found CCSF in non-compliance after it acknowledged that CCSF had performed well under the standard, was fully engaged in its work to comply with the standard, but simply needed more time to complete the work, and it was not clear that the standard required completion. Here are some examples: