June 26, 2015

Barbara Beno, President
The Accrediting Commission for Community and Junior Colleges (ACCJC)
Western Association of Schools and Colleges
10 Commercial Boulevard, Suite 204
Novato, CA 94949

RE: Injunction Process from the Case Brought by the San Francisco City Attorney against ACCJC in the Superior Court of California , Case Number CGC-13-533693

Dear Dr. Beno,

On April 8, 2015 ACCJC submitted its Written Report pursuant to the Final Injunction and Judgment issued by Judge Karnow in the above referenced case. That process provides an opportunity for CCSF to provide written supplemental information regarding those areas of noncompliance for which City College of San Francisco (CCSF) had not previously been afforded the opportunity to present information to the Commission.

CCSF's Response to the Written Report is attached to this letter. It is presented to ACCJC electronically and in hard copy by overnight mail.

We appreciate the opportunity to present this additional information and evidence which we believe supports the Visiting Team's recommendation that CCSF was in compliance with the Standards. As expressed by Judge Karnow, ACCJC is required to consider the supplemental information holistically. The standards, in some respects, are closely interrelated. Applying the holistic approach, if the Commission concludes that the Review Team's recommendations were correct, it should cause the Commission to seriously reconsider and ultimately reverse the termination action. CCSF recognizes that it still would not have been in complete compliance with some of the standards, but the violations would no longer be serious enough to merit termination.

Such a determination is further supported by the fact that CCSF was substantially in compliance with many of the standards. In some instances, CCSF was determined to not be in full compliance despite adopting policies and procedures recommended by the Visiting Team and our own Self Evaluation because not enough time had passed to allow for a complete cycle of implementation, data collection, analysis of data and opportunity for improvement to be considered. There is no evidence that these policies and procedures did not meet the standards nor do the standards require the full cycle to be completed in evaluating compliance. Taken to its extreme, this interpretation would mean that if a college changed a process or procedure, as part of a continuous improvement cycle, the newly adopted policy or procedure would automatically result in a deficiency if the full cycle had not been completed. This interpretation is unreasonable and actually would discourage improvement.

In this instance, if more time had been allowed, compliance with most standards would certainly have been achieved. It is very unusual to provide less than one year to address deficiencies. If CCSF had been allowed a little more time, for instance the usual two years to make the corrections, these recommendations or deficiencies would not have been identified and the remaining deficiencies would not have been of a nature or number to justify termination. Thus, CCSF urges ACCJC to reverse the termination order.

If you need any additional information prior to the July 8 Commission meeting, please do not hesitate to contact me.

Sincerely,

Susan E. Lamb
Interim Chancellor

cc: Kristin Charles, Interim Accreditation Liaison Officer
Dr. Guy Lease, Special Trustee
Board of Trustees

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."

On April 8, 2015, ACCJC presented its Written Report to CCSF. As required by the court, CCSF submits its written response. However, CCSF formally states its position for the record that ACCJC has not complied with the Final Injunction and Order. ACCJC was required to clearly identify any deficiencies and set forth evidence in support of its conclusion. ACCJC has done neither. Deficiencies are not clearly stated and evidence has not been provided.

This lack of clarity and explanation has severely disadvantaged CCSF in the preparation of its written response. Nevertheless, CCSF submits its written response.

Purpose of this Response

ACCJC,in its review of this Response, will likely focus on the "additional evidence" submitted by CCSF. CCSF recognizes that there is relatively little new evidence. However, it is critical that ACCJC recognize the larger purpose of this review. The issue presented by the Final Injunction and Order and the Injunction Process is whether ACCJC erred in taking the unprecedented action of terminating CCSF's accreditation. The court directed ACCJC to conduct a holistic analysis of the entire case. In fact, ACCJC recognized this requirement; the April 8 cover letter from ACCJC described the Written Report as a "holistic written report." ACCJC must also recognize what this Injunction Process is not about. ACCJC has not been directed to determine whether CCSF in 2013 was in compliance with all accreditation standards.

There is no doubt that CCSF, like many other colleges, was not in complete compliance on that date. The court has not directed ACCJC to determine whether CCSF was in full compliance with all standards in June 2013. The issue is- given all the evidence before the Commission plus the evidence and information that would have been presented had CCSF been given proper notice of the additional alleged deficiencies, was termination of CCSF's accreditation justified? The court has directed ACCJC to take a thorough and holistic look at CCSF as of 2013. This Response includes additional evidence not previously presented to ACCJC. This evidence, while it may not conclusively establish full compliance, is compelling evidence that the termination decision was unwarranted and excessive.

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 *the college meets eligibility requirements* and *complies with the standards of accreditation*, as required by [the ACCJC]." (March 19, 2006 evaluation team report, p. 4, emphasis added) ACCJC, in a letter dated June 29, 2006, notified CCSF that its accreditation had been reaffirmed, with a requirement that it complete a Progress Report and a Focused Midterm Report.   The progress report was to focus on Recommendation #4, reducing the percentage of its budget spent on salaries and benefits, and addressing funding for retiree health benefits costs. The ACCJC letter did not state that CCSF was out of compliance and did not make any reference to a requirement that compliance be achieved within any set period of time.

In 2007, CCSF submitted a progress report to which ACCJC responded with a letter that reminds CCSF to submit a Focused Midterm Report with special emphasis on one recommendation from 2006. The 2007 letter does not identify lack of compliance or deficiencies. In 2009, the ACCJC letter accepted the CCSF Midterm Report and required a follow up report for the following year. Although this letter refers to a need to correct deficiencies by 2010 and submit a Follow-Up report, it specifies only recommendations. In 2010, CCSF submitted the required Follow Up report with particular emphasis on actions taken to correct the two recommendations singled out in 2009. If the 2009 mention of deficiencies requiring correction by 2010 was meant to identify these areas as deficiencies, the 2010 ACCJC Action letter on the Follow up report should have addressed whether the deficiencies were satisfactorily corrected or not.

The 2010 ACCJC does not address such questions. It simply states that the Commission took action to accept the Follow up report. This 2010 letter includes paragraphs (identical to paragraphs sent to other California colleges around this time) reminding the college that assessment of Student Learning Outcomes will be expected of all institutions by Fall 2012, and expressing concerns about the funding of Other Post Employment Benefits (OPEB).The 2010 letter does not state that CCSF is out of compliance, instead concluding with a reminder that CCSF must be prepared to demonstrate that it meets standards concerning SLOs and planning by Fall 2012.

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 ACCJC stated that because of its vague and misleading practices regarding notice of deficiencies, ACCJC was not in compliance with relevant sections of the Higher Education Act. To illustrate its point, the DOE referred to ACCJC's response to a complaint filed by the American Federation of Teachers. Commenting on ACCJC's explanation of its processes, DOE stated "This summary alone reflects the difficulty to ascertain what a recommendation represents- an area of noncompliance or an area of improvement." The DOE directed ACCJC to revise its policies to achieve compliance with federal law.

To address these documented flaws in its processes, the Commission attempted to clarify when a "deficiency" is so severe that it will be of the type to trigger sanction. The Board Policy on Relations with Institutions was amended after the 2012 Show Cause Action to clarify the distinction between "improvement recommendations" and "deficiency recommendations". In addition, the Commission at its January 2014 meeting amended its Policy on Commission Actions on Institutions to specifically advise colleges when a deficiency exists and the date by which compliance must be achieved. CCSF did not have the benefit of this clarifying language; instead ACCJC placed CCSF on Show Cause then terminated accreditation based on the old, vague policies. The Commission's policies and procedures were fatally flawed and as a result the Commission's decisions on CCSF were not supported by substantial evidence.

This issue was litigated in the recently decided case People of the State of California v. ACCJC, Case No. CGC-13-533693. The court thoroughly analyzed the arguments presented by ACCJC and concluded that ACCJC deprived CCSF of due process because CCSF was not given the opportunity to respond to deficiencies found by ACCJC. As explained by the court, "City College should have had notice of all deficiencies found by the Commission at the time of a given evaluation, and an opportunity to respond in writing, before those deficiencies are made the basis for termination of accreditation. That did not happen in this case."

The court explicitly rejected ACCJC's contention that ACCJC was entitled to terminate CCSF's accreditation even if ACCJC had not previously given clear notice of noncompliance. ACCJC argued that termination was permissible because the noncompliance, though not stated, was based on facts found by the evaluation team. The court ruled that it is not CCSF's duty to parse through the record to find facts that might support termination. Instead, the court decided that "a deficiency is not listed or identified with respect to a specific standard unless and until the

underlying behavior is directly tied to a failure to meet the standard." 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 2012 until the show cause visit in April 2013 ACCJC was barely nine months. ACCJC must not, as it did in 2013, base its decision on a belief that CCSF had notice of deficiencies prior to 2012. ACCJC must determine whether it was appropriate to terminate accreditation of an institution less than one year after receiving notice of any deficiencies. CCSF has argued that, even under the best of circumstances, nine months was not long enough to address the many issues raised in 2012. In fact, given the fact that many of the issues require the passage of time to establish compliance, it was literally impossible for CCSF to have achieved full compliance by 2013. This must be taken into consideration by ACCJC in its holistic reconsideration.

Standard of Review

In any administrative or judicial analysis, the standard of review is of great importance. ACCJC does not articulate the manner in which it reaches decisions. It is unclear whether ACCJC decisions must be based upon the preponderance of the evidence, substantial evidence or some other basis for decision. Clearly, it is impossible to discern why ACCJC decided to terminate CCSF's accreditation when numerous other institutions have encountered serious accreditation challenges and have not been deemed subject to termination.

The court in requiring this reconsideration of CCSF's accreditation status concluded that CCSF's due process rights were violated by ACCJC. The current process is the court's attempt to force ACCJC to correct the wrong perpetrated against CCSF. The court has directed ACCJC to proceed with a holistic review of CCSF's accreditation status. A holistic review requires ACCJC to approach the case de novo. ACCJC should not simply decide whether to reaffirm the decision it reached in 2013. ACCJC should review the entirety of its 2013 decision in light of the additional evidence and information provided through this injunction process to determine whether the extraordinary 2013 termination decision was the right decision.

In an administrative proceeding, the reviewing body is expected to base its decision on evidence, and in this case, ACCJC should determine whether there is substantial evidence to support a decision to terminate one of the country's largest and most successful educational institutions. Abuse of discretion will be found if ACCJC's findings are not supported by the evidence, and it was Judge Karnow's expectation that the decision must supported by substantial evidence.

The Review Team that visited CCSF in 2013 found that CCSF was in compliance with the standards that are at issue in this Response, even if some subpart of the standard was not in place or if additional time was needed to establish the long-term viability of the particular activity. Accreditors generally refer to this as being in "substantial compliance" with a standard. For example, ACCJC's Policy on Commission Action on Institutions says that accreditation will be reaffirmed if "The institution substantially meets or exceeds the Eligibility Requirements, Accreditation Standards and Commission policies." An institution's accredited status is reaffirmed with a follow-up report or visit if the institution "substantially meets or exceeds the

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 that is 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 resubmitted 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 noncompliance is or how it might be remedied. ACCJC has failed to comply with the Final Injunction and Order, and CCSF expressly reserves the right to raise this issue in a future judicial or administrative proceeding.

ACCJC Should Give Proper Consideration to the Findings of the Visiting Team.

In the accreditation process, the accrediting team makes recommendations on both the overall status of the institution (affirmation, warning, etc.) and specific recommendations on how the

institution must improve to achieve compliance or on how it can improve if compliance has already been achieved. The overall recommendation is not viewed by the institution, the specific recommendations are made known. In both cases, the Commission as a whole receives and considers the recommendations. The Commission has discretion to modify both types of recommendations.

However, in the case of CCSF, the modifications were so significant, sweeping and substantive that they raise questions of fundamental fairness for CCSF. Regarding the final recommendation of the Commission, in 2012, the Commission imposed a harsher sanction on CCSF than was recommended by the team. The team recommended probation, yet ACCJC place CCSF on Show Cause. And in 2013, it is evident from the Review Team's that termination was not anticipated or desired by the Review Team. While a deviation from a team recommendation is not a de facto violation of ACCJC procedure, it is appropriate to exercise great caution when a decision that conflicts with a team report will result in termination of accreditation. A decision of that magnitude should be supported by the visiting team's recommendation.

The Show Cause Review Team considered approximately 80 substandards that had been cited in 2012. Of those 80 substandards, the 2013 Review team found CCSF in full compliance with 54 of the substandards and partial compliance in several others. Thus, at the time the April 2013 Review Team visit was conducted, a significant majority of the deficiencies had been addressed. It is probable that upon seeing this substantial improvement, if given the opportunity, the Review Team, if asked, would have recommended against termination, yet the Commission proceeded with termination. Because of these errors, the Commission violated its procedures and policies and the Commission's decisions were not supported by substantial evidence.

ACCJC Provided Insufficient Time to Correct Deficiencies Identified in the 2012 Show Cause Action.

The US Department of Education has issued rules to ensure that accrediting agencies cause colleges to come into compliance within a reasonable period of time. Accrediting agencies for community colleges, are directed to ensure compliance within two year of notification by the accrediting agency. This "two-year rule" has also been memorialized in Commission policies. In recent years, the Commission has placed increasing emphasis on the two-year rule. However, there have been several cases involving California community colleges in which colleges have remained in a state of noncompliance beyond two years, yet the Commission did not act to terminate accreditation of those colleges as it has with CCSF. There have also been cases of allowing more than two years for Pacific region colleges overseen by the Commission.

For CCSF, the Commission not only did not allow CCSF the extended period beyond two years that typically had been allowed in the past, the Commission did not even allow for the standard two years. The Commission placed CCSF on Show Cause status on July, 2 2012. The Show Cause Review occurred on April 4- 5, 2013, a mere nine months later. Considering the numerous deficiencies identified in 2012, some for the first time, it is unreasonable to provide only nine months for correction. Nevertheless, the Commission took the extraordinary step of voting to terminate accreditation less than one year after the Show Cause order. The Commission did not offer any explanation for this drastic and unprecedented action.

Conversations between President Beno and CCSF administrators suggest that that the Commission believed federal law required that under the two year rule the appeal process must

be completed within the two years specified in federal law. If this is in fact the Commission's position, it is unwarranted and is not supported by the language of the regulation. Furthermore, it is inconsistent with the manner in which the two year rule has been applied to colleges in the past.

34 CFR 602.20 provides "If the institution or program does not bring itself into compliance within the specified period (two years in this case), the agency must take immediate adverse action unless the agency, for good cause, extends the period of achieving compliance." It is quite clear that the drafter of this language anticipated that ACCJC is authorized to allow two years before bringing adverse action, and longer if good cause exists.. Thus, because the Commission identified the deficiencies in its July 2, 2012 Show Cause letter (CCSF has already established the 2006 action did not properly identify deficiencies.), the Commission was not required to take adverse action until July 2014.

This misreading and misapplication of federal law is at the heart of ACCJC's incorrect decision to terminate in 2013. Because Judge Karnow ordered a holistic review of the 2013 decision, this error is also the crux of the reconsideration. In the vast majority of the findings of noncompliance, the 2013 review Team and ACCJC recognize that that CCSF had taken the steps needed to bring the college into compliance. The problem, according to ACCJC, was that CCSF had not demonstrated compliance over a sufficient period of time. However, the lack of time to establish compliance was entirely the result of ACCJC's decision to allow less than one year to achieve compliance. And this decision was based on ACCJC's now wholly illegitimate claim that notice was given in 2006.

For this reconsideration, ACCJC should approach the issue correctly and in conformance with state and federal law. ACCJC should evaluate the level of compliance in 2013 with a new and proper assumption that notice of deficiencies was provided for the first time in 2012. Given less than one year to comply, ACCJC's termination decision was premature and should be reversed.

Supplemental Evidence and Information

The Final Injunction and Judgment provides that CCSF should provide a written response within 80 days of receipt of the Written Report. The court does not provide any further information or direction on what should be included in CCSF's written response. As stated previously and will be described more particularly in the following sections, ACCJC's Written Report is not compliant with the Final Injunction and Order. ACCJC has provided neither the level of detail nor the quantity or quality of evidence that would support termination of a college.

For each standard identified by ACCJC in Part 3 of its Written Report, the CCSF Response includes the Standard to be discussed (in italics), the entirety of the evaluation and recommendation from the 2013 Visiting Team Report (Visiting Team Report, in bold print), and a summary of the conclusions from the ACCJC Written Report and the response from CCSF . In many cases, the CCSF Response refers to the absence of evidence from ACCJC. The CCSF Response includes new evidence not presented to ACCJC previously. However, the Response also includes additional explanation of previously submitted evidence intended to bring to ACCJC's attention errors in its conclusions from 2013. These explanations would have been

presented to ACCJC in 2013 if CCSF had been provided notice that ACCJC was basing its termination decision on findings inconsistent with those of the 2013 visiting team.

Standard I.A.3. *Using the institution's governance and decision making processes, the institution reviews its mission statement on a regular basis and revises it as necessary.*

The Team Report states:

City College of San Francisco undertook a review of its Mission Statement in response to Recommendation 1 set forth in the 2012 Evaluation Report. After examining internal and external data, surveying CCSF personnel, reviewing the California Education Code, and receiving input from the public, the governing board narrowed the priorities of Mission Statement from seven to four. The four priorities of the Mission Statement are: 1) preparation for transfer, 2) achievement of associate degrees, 3) acquisition of career skills, and 4) development of basic skills, including English as a Second Language and Transitional Studies. The Mission Statement
also focuses on student learning and achievement and the role of assessment.
The governing board adopted policy containing the revised Mission Statement in September 2012. The policy includes that the Vision and Mission Statements will be reviewed annually during the Board's annual summer retreat when the governing board establishes its planning priorities for the next year.

Conclusion:
The college meets the standard.

The Written Report says:
"The Commission found the team report predicts completion of work to meet the standard in the future, but does not describe current compliance with Standard I.A.3. The noted evidence of "partially addressing" the recommendation concerning standard I.A.3. supports the Commission finding that the college is not currently in compliance."

The "evidence" cited by the Commission to support this finding is that the team report "does not describe current compliance with Standard I.A.3." But aside from this general conclusion, there is no discussion whatsoever to the language which addresses I.A.3., and which allegedly "does not describe current compliance." The Standard says the mission statement must be regularly reviewed and revised as necessary. CCSF was in full compliance with this Standard. It recently revised its mission statement and had a practice in place for regular review and reconsideration of the mission statement. As of June 2013, there was literally nothing more that CCSF could have done.
The 2013 team reported the following:
". . . the policy included a provision that the mission statement would be reviewed annually when the board establishes planning priorities for the next year."

On its face, contrary to the Commission's statement, this provision does in fact state the current policy – to review its mission statement every year, at the specific time when it establishes planning priorities. This comment was made concerning City College's process that was adopted following the time-frame granted by the Commission, for submitting its "show cause" report. But the Written Report does not explain why the College's process, accepted by the team, does not meet the standard.

Furthermore, under the written published standard in ACCJC's accreditation reference handbook, City College was in compliance with the standard**.** The College's mission statement was reviewed in September 2012, and the 2013 evaluation team visited the College in April 2013. That is roughly 6 to 7 months after the last review. The College had completed a review of its mission statement and had put in place a plan to review it on an annual basis. This satisfies ACCJC's standard of reviewing the mission statement on a "regular basis."

ACCJC says the team report "predicts completion" of the work required by this standard. In fact, the team report doesn't predict anything. It states facts. It is ACCJC that apparently predicts that CCSF will not comply in the future. ACCJC's conclusion contradicting the finding of the visiting team is based on speculation about what may happen in the future. As of June 2013, CCSF was in compliance.

Further, based on other comments in the 2012 Team Report, on September 11, 2012 the College revised its policy to provide that it would henceforth review its Mission Statement annually. This new policy, and its long history of regular review every six years, meets the ACCJC's standard for" regular review" of the Mission Statement.
Other colleges in the State likewise cite policies they have adopted calling for periodic review, and plans in place for future regular review of the Mission Statement. For instance, Laney College's most recent self-evaluation noted, "The college planning cycle will prompt future changes, if needed, to the mission statement ..." (Laney College Institutional Self-Evaluation, p. 84, dated Dec. 10, 2014)
Accordingly, the Commission is respectfully requested to revise its determination and conclude that City College meets this standard.

Standard I.B. *Improving Institutional Effectiveness*
The institution demonstrates a conscious effort to produce and support student learning, measures that learning, assesses how well learning is occurring, and makes changes to improve student learning. The institution also organizes its key processes and allocates its resources to effectively support student learning. The institution demonstrates its effectiveness by providing 1) evidence of achievement of student learning outcomes and 2) evidence of institution and program performance. The institution uses ongoing and systematic evaluation and planning to refine its key processes and improve student learning.

Standard I.B.1. *The institution maintains an ongoing, collegial, self-reflective dialogue about the continuous improvement of student learning and institutional processes.*
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ACCJC's 2013 team report provides:

Findings and Evidence:

The college has demonstrated a conscious effort to measure and support its effectiveness in assuring student learning. Institutional effectiveness measures, including measures of student achievement and student learning, are part of the planning system revised in response to the March 2012 Evaluation Visit. The planning system is based on program reviews that include evidence of achievement of student learning and program performance. Implementation for the revised planning system is in its early stages as a full cycle has not passed. The system provides an ongoing and systematic data-based process for institutional improvement and resource allocation.

A number of changes have resulted to increase dialogue about continuous improvement of student learning and institutional processes at CCSF. The college-wide dialogue around the Commission's determination that the college must Show Cause to maintain its accreditation has been extensive. Fifteen workgroups were established to address the deficiencies found by the March 2012 Visiting Team. The minutes and progress reports of the 15 accreditation workgroups demonstrate that a great deal of work has occurred.

For example, Accreditation Workgroup Progress Forms from Workgroup 2 demonstrate that considerable progress occurred by August 2012. The planning system has been revised. An annual timeline for planning has been put into place and has been followed, as demonstrated by the completion of program reviews by units across the college and by the use of those program reviews to produce an overall prioritization of resource requests. Additionally, an SLO Coordinator was assigned to work across the college. College committees are being restructured, and a Dean of Institutional Effectiveness has been hired.

The participation of the college community in recent work to improve college processes and ensure institutional effectiveness is evidenced by the minutes and progress reports of the many workgroups formed to address the Commission's Show Cause determination and by interviews conducted by the Show Cause Visiting Team during the April 2013 visit. The extensive work of the Research and Planning Office and the Planning Committee to support college planning and assessment is especially notable.

A culture of dialogue related to institutional effectiveness is present at the college. For example, the Show Cause Visiting Team heard from various college faculty and staff, including the interim Vice Chancellor of Academic Affairs, the SLO Coordinator, the members of the planning and curriculum committees and the Distance Education Coordinator, that the revised program review process has resulted in widespread collegial, self-reflective dialogue about the improvement of student learning and institutional processes. Comments such as "I never understood before how important it was to talk to other departments" were common. Minutes of the Planning Committee reflect the engagement of constituencies in discourse.

The new SLO Coordinator's primary responsibility is to facilitate dialogue related to SLO assessment results and to cultivate the use of those results for improvement. SLO assessment results are emphasized more strongly in the planning process than they had been a year ago. This is evident from a review of recent program reviews. College-wide events focus on SLO assessment and institutional effectiveness dialogue. Hiring a permanent SLO Coordinator is the top-ranked item on the prioritized college-wide list of program review objectives.

The new Participatory Governance Council (PGC) is designed to support the current high-level dialogue related to institutional effectiveness; however, the PGC has just begun its work. CCSF must continue its deliberate work to ensure that the degree of dialogue related to institutional effectiveness that has been achieved in the wake of the Show Cause decision is maintained in the future.

Conclusion:
The college meets the Standard.

"In its Written Report, ACCJC identified the deficiency in vague terms:

". . . certain processes charged with carrying forward dialog around continuous improvement of student learning and institutional processes were not yet fully engaged and did not include all parts of the college. Thus, dialog involving all levels of the college and influencing institutional action for improvement, cannot be demonstrated. The noted evidence of 'partially addressing' recommendation 2 which included I.B.1, also supports the finding that the college is not currently in compliance."

The Written Report does not identify which processes were "not yet fully engaged," and which "parts of the college" were not included. Without notice of which processes were not yet "fully engaged," or which parts of the college were not included to the satisfaction of ACCJC, City College cannot understand whether to rebut, explain, accept or refute the Commission findings and evidence. Thus, ACCJC's report fails the court's requirement that the Commission "clearly explain" the deficiency and provide supporting evidence.

ACCJC attempts to buttress its argument by referring to Team Recommendation No. 2, but this merely restates what was already said. ACCJC in 2012 directed CCSF to improve its processes to allow for "ongoing, collegial, self-reflective dialogue". This is exactly what CCSF did in the intervening months between July 2012 and the team visit in April 2013. The team found that CCSF had achieved compliance with the standard, but ACCJC rejected this finding. The essence of ACCJC's conclusion is that there had been inadequate proof that the systems established by CCSF would succeed over time. However, this was physically impossible to establish because ACCJC had not allowed CCSF sufficient time to prove success over time. CCSF was allowed only one year to establish the process and prove long term success. This could not be accomplished in the short time allowed.

This is equally true of the Participatory Governance Council. 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 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 has an Institutional Effectiveness Committee. There are more than 40 shared governance committees that engage in dialogue about the college and its processes. The Academic Senate Executive Council, College Advisory Council, and College Planning and Budgeting Council connect this dialogue to planning and resource allocation processes."

In the subsequent course of its discussion of Standard I.B, the 2012 Report noted many positive aspects of the college's compliance with Standard I.B. and its efforts a continuous quality improvement. The Report noted that the college had in place a 2011-2016 Strategic Plan and a 2011-2012 Annual Plan, and pursuant to those plans, an End-of-Year Assessment was being prepared by 2011-12. The college had a College Planning and Budgeting Council that sets goals and objectives for the college. The college had a Program Review Committee whose task was to supervise the college's program review process, which included templates for use in the reviews. The templates asked for information from each department about goals and objectives for the next year in light of student achievements in the past year. The Report noted that the program reviews were being conducted. The worst thing this report said about the program review process was that "the degree to which these objectives are achieved varies from program to program. There is also substantial variation in the extent to which data related to institutional or program effectiveness is addressed in the program reviews." (See page 25). However, the report also noted that "the program review process has been strengthened each year," but noted that more remains to be done. (Page 25).

The 2012 Report noted that the program review process was important to the college. The Report stated (page 28):

"The institutional self-evaluation states that the primary method by which the college measures institutional effectiveness of its broad educational purpose, student learning programs and services, and student learning is through the program review process, which includes a review of all instructional programs, student support services and library and learning support services. The Program Review Committee, working through subcommittees, reviews and summarizes the program review documents from across the college. The effectiveness of the program review process was evaluated via a survey of college employees, and improvements to the process are being implemented."

The program review process is central to the college's on-going improvement. The 2012 report found that this was a work in progress, already with substantial achievements but with more work to be done. The 2012 Report concluded that the college only partially met Standard I.B, because, while the college had made substantial progress in meeting the standards, the college's efforts were a work in progress, with more work remaining to be done. In this conclusion, the 2012 Report's only mention of "dialogue" was this (page 28): "However, the quality of self-reflective dialogue varies and college-wide dialogue needs to be strengthened." A fair reading of the Report's conclusion, based on its determination of "partially met," is that the college was not seriously out of compliance with Standard I.B. and that the identified shortcomings could be easily remedied.

The 2013 Show Cause Evaluation Report found that the college had remedied any shortcomings that existed previously with respect to Standard I.B.1. The college was now in compliance with standard I.B.1. This report discussed Standard I.B.1 separately from all the other parts of Standard I.B. The 2013 Report had nothing but praise for CCSF's compliance with this standard. Specifically, the Report did not say, as claimed by the commission in its Written Report, that "certain processes charged with carrying forward dialog around continuous improvement of student learning and institutional processes were not yet fully engaged and did not include all parts of the college." The only statement in the 2013 report that remotely resembles this is the statement, at the very end of the section, that "the PGC [Participatory Governance Council] has just begun its work." That statement in no way supports the conclusion, asserted by the commission,that "Thus, dialog involving all levels of the college and influencing institutional action for improvement, cannot be demonstrated." *I*ndeed, that conclusion is contradicted by the 2013 Report's simple, clear statement: "A culture of dialogue related to institutional effectiveness is present at the college." This is clearly shown by the additional evidence listed below.

Focused discussions about student progress and success were continued and expanded to include specific SLO conversations throughout the ESL department, particularly in the Credit and Noncredit Curriculum Committees, as reflected in the committee minutes.

Members of the ESL Department participated in a statewide committee to discuss CB21 definitions. CB21 is perhaps the best publicized code because of the large scale effort to properly code our basic skills courses. In order to see statewide student movement through basic skills, discipline faculty were asked to map local courses to a common template in order to show levels of progression. The CB21 code indicates how many levels below transfer your course is. By looking at these codes for a sequence of courses, we are able to track student progress towards transfer level coursework. This discussion was extended to all faculty in the ESL Department in 2009, published in the ESletter, a department-wide newsletter.

The 2012 Report made two recommendations relating to Standard I.B – Recommendations 2 and 3. Neither of these recommendations made any mention of the specific requirement of Standard I.B.1. Specifically, Recommendation 2, cited by the commission in its Written Report as having some relevance here, was that the college should develop a strategy for fully implementing its existing planning process. *Standard I.B.1 calls for "collegial, self-reflective dialogue about the continuous improvement of student learning and institutional processes." Unlike Standards I.B.4 and I.B.6, it does not call for the development or implementation of planning processes.* In

parentheses at the end of this recommendation, the Report listed 19 different standards by number only, including standards in groups I, II, III, and IV, without any explanation as to why those standards were listed. The only reference in Recommendation 2 to Standard I.B.1 was buried in that list.

The 2013 Show Cause Evaluation Report addressed CCSF's compliance with the 2012 Report's Recommendation 2 (2013 Report, page 67). In this section, the report praised CCSF for its strategy for fully implementing its planning process, for the implementation of its revised program review process, and for the implementation of its planning activities. The only shortcomings identified related to not fully including the centers at this time in some of the resource allocation activities.

The 2013 Report said nothing negative bearing on CCSF's compliance with Standard I.B.1 in this section. Specifically, the 2013 Report says nothing to negate the assertion, that CCSF "maintains an ongoing, collegial, self-reflective dialogue about the continuous improvement of student learning and institutional processes." Clearly, the team would not have intended to say any such thing, because the Report had already determined that CCSF was in compliance with Standard I.B.1.

Thus, contrary to the Commission's belief as set forth in its Written Report, the fact that the 2013 Report found that CCSF had only partially addressed Recommendation 2 does not support the Commission's conclusion that CCSF failed to comply with Standard I.B.1. Recommendation 2 itself did not say that any aspect of Standard I.B.1 required remedial work, and the 2013 Report, in its discussion of Recommendation 2, did not say or imply that CCSF had failed to meet any element in Standard I.B.1.

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

Additional **Evidence:**

CCSF Counselor Conference Presentation
http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202009-2010/SLO%20Program%20review%20AandR%20022610.pdf

http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202009-2010/SLO%20Program%20review%20AandR%20022610.pdf

2009-2010
CDPC Program Review
http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202009-2010/CDCD09-10ProgramReview.pdf

Biology faculty dialogue on SLO's.

https://sites.google.com/a/mail.ccsf.edu/bio9-instructor-resources/slos/Biology%20Dept%20Course%20SLO%20BIO9.doc?attredirects=0&d=

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/BCST-126-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/apr2920
10_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_S11/2010120
1MinutesOfficial.pdf
Implemented thereafter by A&R (cf. Dean Leyba for evidence)
Study Abroad in Asia and Cuba
Developed by International Education Advisory Subcommittee during 2010-2011 (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/AsMin20
110518.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/AsMinBi
p20101103.pdf and 2011 February
23 http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_S11/AsM
inBip20110223.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/AsMin20
110824.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.

PROGRAM SLO, PREPARED BY JOHN WILK (2012)
Interior pages include plans for assessment methods for every outcome in the courses John teaches: ThA 153, ThA 155. ThA 160, ThA 161

2012 PLANNING (yellow post-it)

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 priorities 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 2.0 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.

The college prioritization of program review resource allocation requests offers evidence of institutional commitment to provide needed resources for the Office of

Research and Planning to support and grow a culture of evidence and data-informed decision making. Seven of the Chancellor's Office priorities, which are based on program review for that area of the college, support strengthening the Office of Research and Planning.
Program Review is data-informed. Data used by departments as part of program review includes staffing and budget data, student enrollments, student headcount, FTES,
FTEF, student demographics, and course success rates, as well as degree and certificate completion numbers. For student service areas, data also include the number of student contacts and student and employee survey data. Program reviews from across the college, including CTE, transfer, basic skills, and student service departments, demonstrate the informed use of this data. Additional data is available through the Decision Support System (DSS). The DSS is being replaced by Argos, a new data management tool.
The revised program review system has strengthened the ability of the college to use both qualitative and quantitative data, as is evident from quality of the program reviews and the use of those reviews to develop prioritized lists of resource requests.
Conclusion:
The college meets the Standard.

In its Written Report, the Commission issued the following conclusion (numbers in brackets added):
"The team's observations about [1] the remaining work needed so that all locations on the college can be included in planning, and [2] about the need for all (not just some) program reviews to examine student learning outcomes for improvement, [3] as well as the team's note of CCSF "partially addressing" previous Recommendation 2, supports the finding that the college is not currently in compliance with Standard I.B.2."

The 2012 Report discussed Standard I.B. and all of its sub-parts in one section. Standard I.B.2 requires goals to be set, to lead to the development of measurable objectives, to be widely discussed, and to be worked on collaboratively by the college community. Parts of the 2012 Report's discussion of Standard I.B. addressed these issues. The 2012 Report praised the college for its performance under this standard as follows (page 25):
"The 2011-2016 Strategic Plan indicates six strategic priorities with associated objectives. The College Planning and Budgeting Council sets goals and objectives for the college in the Annual Plan. The 2011-2012 Annual Plan includes strategic priorities, major goals under each strategy, and objectives associated with most of the goals. Many of the objectives in the Annual Plan are stated in measurable terms."
By itself, that statement shows that CCSF has met the first two sentences in Standard I.B.2. The 2012 Report then continues, as follows (page 25):

"[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. Nowhere in its explanation for this conclusion did the report cite any shortcomings with respect to goals and objectives as the reason for the "partially met" finding. (Page 28).

The 2012 Team Report included two recommendations for improvement under Standard I.B. – Recommendations 2 and 3 (page 29). Neither of those recommendations suggested there was a need for CCSF to improve its approach to goals and objectives under Standard I.B.2. The long list of numbers citing various standards at the end of Recommendation 2 included I.B.2, without any explanation as to why that standard was cited. Lacking such explanation, it cannot be inferred that the report had noted any failure to meet that standard. The most reasonable inference, then, is that in 2012, CCSF met Standard I.B.2.

The 2013 Team Report addressed Standard I.B.2 in a separate section. The report had only praise for the college's compliance with this standard, with not a single word of criticism (pages 12-14). The 2013 Team Report also addressed CCSF's responses to Recommendations 2 and 3 (pages 67-68). The report concluded that CCSF had partially addressed Recommendation 2 and fully addressed Recommendation 3. The Report praises CCSF for many aspect of its response to Recommendation 2, and faults CCSF only for not fully including the centers in the described process. There is nothing in the Report's discussion of CCSF's response to Recommendation 2 that even remotely suggests a criticism of CCSF's accomplishments regarding goals and objectives.

In its Written Report, the Commission relies on evidence it claims is found in the 2013 Report in support of its conclusion of "standard not met." However, the Commission tacitly acknowledges that the 2013 Report had only praise for CCSF's compliance with this standard, by going outside the Report's discussion of this standard to find what it might characterize as defective performance elsewhere (page 81). However, the evidence the Commission cites in support of its conclusion of "standard not met" is not relevant to this standard.

In its discussion of Standard I.B.2, the 2013 Report did not make an observation "about the remaining work needed so that all locations on the college can be included in planning." Even if that observation were made somewhere else in the report, it does not support the

Commission's conclusion. The observation is not relevant to Standard I.B.2, because it does not address whether CCSF has adopted goals and objectives and is working collaboratively towards them.

As noted by the Commission, the 2013 Team Report found that CCSF had only "partially addressed" Recommendation 2. However, that does not support the Commission's conclusion that CCSF failed to meet Standard I.B.2. As noted above, the 2013 Report nowhere suggested that this "partially met" finding in any way implicated CCSF's accomplishments regarding goals and objectives.

In addition, since the 2012 Team Report in essence found that CCSF met Standard I.B.2, despite some possible but not clearly articulated minor shortcomings, and since the 2013 Report gave only praise to CCSF for its compliance under this standard, it would be an abuse of the Commission's discretion to find otherwise.

In direct response to the directive to improve planning and budgeting integration, the college produced an annual Budget and Management Plan for the specific purpose of creating a demonstrable connection between annual plans and division plans and the college's budget allocations. Evidence is the Focused Midterm Report (links are visible online but are broken to the Plans themselves), which states:

"Starting in 2007-08, the College also publishes an annual Budget and Management Plan which shows the integration of budgeting with the planning objectives and provides basic information about the use of resources for on-going College operations and new initiatives." I wrote the first Plan with the participation of consultant Denton Crews. The Budget and Management Plan contained the division plans and reports on their implementation. It also contained budget highlights relating to institutional spending that made the implementation possible. One purpose of the report was to assure the Board that their priorities and the annual plan were connected to division plans under each vice chancellor and that the division plans had been implemented via the budget the Board had approved. The Plan was intended to document and illustration the connections. It was produced twice, in 2007-2008 and 2008-2009. When the planning office had fewer resources in 2009 and later, the decision was made to discontinue the Budget and Management Plan, instead taking a different approach to the integration of planning and budgeting. The new approach, under a different chancellor, was to take advantage of program reviews, which by then had been put on a shorter, annual cycle. The college also worked on scheduling and structuring each planning initiative so that it would be able to inform subsequent initiatives. The college under its longtime chancellor had developed a very extensive system of planning and institutional assessment (even a mid-year assessment of the annual plan) and efforts were made after his departure to simplify that system and make better use of program review, ARCC and Scoreboard data, and later, the increasing amounts of SLO reporting data.

http://ccsfforward.com/focused-midterm-progress-report-march-15-2009/

broken links visible on google:
[PDF]Annual Budget and Management Plan - City College of San ...
www.ccsf.edu/NEW/.../ABMP0708.pdf
City College of San Francisco

Oct 29, 2007 - City College of San Francisco. Annual Budget and Management Plan: 2007-2008. 11. Fall 2006 CCSF Credit Enrollment. Latino/a. 16%.
[PDF]Annual Plan 2008-09 - prospective measures.pdf - City ...
www.ccsf.edu/.../Annual%20Plan%202008…
City College of San Francisco
CCSF's campuses, including Ocean, Evans, Chinatown/North. Beach, Downtown ... Academic Affairs. Annual Budget and Management Plan: 2008-2009. 31 …

From 2011-2012: A PDF file of the entire Program Review is attached (2011-2012_Fall_Program_Review_WOMN.pdf) because the evidence didn't fit neatly in a screenshot. For clear evidence of engagement and linkages with the larger college plans, please see the Major Planning Objectives on page 14 and the "Links to plans" section on pages 16-17.

A further example of the collegewide dialog is the involvement of the Board of Trustees in the development of the integrated planning model.
ftp://advancement.ccsf.edu/Injunction/pbc%20minutes%20joint%20mtg%20BOT%20commit%2004212009%20official.pdf

The College's application for seeking Perkins funding also describes a robust planning process.
ftp://advancement.ccsf.edu/Injunction/Carl-D-Perkins-Internal-Allocation-Process.pdf

The Written Report concludes:

"The team's observations about the remaining work needed so that all locations of the college can be included in planning, and about the need for all (not just some) program reviews to examine student learning outcomes for improvement, as well as the team's note of CCSF 'partially addressing' previous Recommendation 2, supports the finding that the college is not currently in compliance with Standard I.B.2."

However, ACCJC did not identify what "remaining work" City College has to do, and neither did the 2013 evaluation team. Thus, ACCJC failed to identify facts supporting this deficiency. The deficiency is not "clearly identified" because this section of the 2013 evaluation report on standard I.B.2. is positive, and outlines what City College has done to comply with this standard. The 2013 report does not discuss any remaining work that needs to be done.

Before implementing a new planning model after the Show Cause action, CCSF did have an effective integrated planning process in effect. Beginning in 2002, CCSF, very consciously through administrative leadership and dialog with college groups, refined its strategies for integrating college plans and operationalizing those plans, including connecting planning to budgeting. In the earlier years of this period, the focus was on connecting unit plans to the college annual plan by having the unit objectives cite the annual plan. (evidence: bruce.pdf and Cost Center Memo 05-06 see page 1)

Later, it was made clear that in drafting their objectives, managers should not only review the Annual Plan but should also be reviewing other college plans such as the Education Master Plan, the Facilities Plan and the Technology Plan. (evidence: UNIT Plan)

The managers' resulting unit plans, informed by these annual and long-term institutional plans were aggregated to form an Operational Plan which guided management in operationalizing the annual and longer term college objectives. The unit plans were to serve as "roadmaps" to guide operations. (evidence: Cost Center Memo 05-06)

For several years during the mid-2000s, the college held annual all-day planning and budgeting hearings at which the vice chancellors would "present their thoughts on planning objectives and budget priorities for the College" (evidence: Cost Center Memo 05-06 page 2) to all constituencies, with the Planning and Budgeting Council and the deans being the principal audience. This was a bottom-up process, yet it was informed by the annual and longer term college plans as well as by Board priorities. The division plans created by each vice chancellor then became what their division implemented and reported on at the end of the year.

In 2007-08 and 2008-09, the college furthered the integration of planning with budgeting by documenting that integration through division planning in a relatively concise and user-friendly Budget and Management Plan. This plan included both graphical and narrative representation of college successes and challenges, with supporting budget detail relating to operational and strategic priorities. Performance measures were indicated. It was intended primarily for the review of the Board of Trustees, who had expressed a desire to understand better how their budget was being used. (Evidence: (http://www.ccsf.edu/NEW/budget/ABMP0708.pdf and http://www.ccsf.edu/BOT/Special_Meeting_Notices/2009/August%202009/Annual%20Plan%20 2008-09%20-%20prospective%20measures.pdf)

In 2008 the College improved its institutional assessment by initiating a direct assessment of both the annual and division plans. Previously, the implementation of these had been assessed indirectly through unit level assessment and the College Performance Indicators Report. (evidence: PBC minutes 10-14-08). That fall, a Mission and Vision Statement Survey was conducted in preparation for the revision of the Strategic Plan. (evidence: PBC minutes 10-14-08) The level of response to the survey was excellent, with many comments that formed the basis for revised drafts of both documents.

Once program review had been started up again, that had potential for integration of planning and budgeting if that six-year process included at least an annual piece to it that connected with budgeting. Initially, a hybrid model including both the traditional six-year and a new one-year process was introduced in order to accomplish that goal (evidence: PR Overview). As the comfort level increased with the annual process, Program Review became an annual process in its entirety. The importance of getting Program Review done, in particular for its accreditation implications, was strongly emphasized to the constituencies. WASC/ACCJC had recommended that CCSF connect Program Review to processes of budgeting and position allocation. CCSF had had an on-going effort to assess effectiveness, but starting Program Review up again and making it an annual process enhanced that effort and made it broader. On February 12, 2009 the Planning

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 through timing, i.e., earlier plans could inform those produced subsequently, the college would avoid taking on too much planning at one time, and the accreditation cycle and planning agendas from the Self Evaluation would be considered in the scheduling process. The new system was to be more economical and efficient in making maximum use of program review, SLOs data, and scorecard data. Thus, CCSF had an effective integrated planning model in place.

Furthermore, Standard I.B.2 is about "goal-setting". Neither the visiting team nor ACCJC found that CCSF was deficient in this area. Instead, ACCJC restated its conclusion raised in II.B.1 and other parts of the document that there was inadequate linkage between program review, planning and resources. It is quite clear that ACCJC believes this to have been a problem in 2013. However, it is inappropriate to raise this point as the basis for finding noncompliance in standards that do not require this linkage. CCSF was clearly compliant with Standard I.B.2 as determined by the visiting team. ACCJC has relied on facts unrelated to this standard to find noncompliance. ACCJC refers to a finding on Standard II.A.2 "that proficiency has not been achieved in this area" to support its conclusion that CCSF was not meeting Standard I.B.2. However, the Team did not reach such a conclusion on I.B.2. ACCJC is using a finding in one section to support noncompliance in other sections where the team found outstanding work has been done. While the standards are interrelated, it is inappropriate for ACCJC to find one area of noncompliance and bootstrap that finding to other areas not identified by the Visiting Team.

Finally, this is an example of a standard in which compliance could have been proven beyond any doubt if ACCJC had allowed CCSF a reasonable period of time to complete its work. The problem identified by ACCJC was that "the new process has not yet gone through a full cycle of implementation and assessment." The reason for this is obvious; ACCJC did not allow enough time to pass before prematurely acting to terminate accreditation less than one year after CCSF received notice of a deficiency.

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

Standard I.B.3. *The institution assesses progress toward achieving its stated goals and makes decisions regarding the improvement of institutional effectiveness in an ongoing and systematic cycle of evaluation, integrated planning, resource allocation, implementation, and re-evaluation. Evaluation is based on analyses of both quantitative and qualitative data.*

The 2013 Team Report says :

Findings and Evidence:
No deficiency was found in the March 2012 Evaluation Visit. No deficiency was found during the Show Cause Visit.
At the time of the March 2012 Evaluation Visit, CCSF had an ongoing cycle of evaluation, planning and re-evaluation. A few years previous to the 2012 visit, the
college had assessed its progress toward effective decision-making and had designed an integrated planning system. The planning system in place at the time of the March 2012 Evaluation Visit included all of the elements of an ongoing, systematic cycle of evaluation, integrated planning, resource allocation, implementation, and re-evaluation based on data. It was the judgment of the team that the planning system was adequate to meet Standard I.B.3. Regardless, a number of factors related to other parts of the Accreditation Standards, such as fiscal resource issues and the need to clearly define governance roles and structure had hampered the use of the planning system. These problems were addressed in the March 2012 Evaluation Report related to those Standards.

At the time of the Show Cause Visit, it was clear that 1) the planning system had been strengthened beyond the adequate system that was in place in 2012, and 2) the fiscal and governance issues that had hindered the use of the system had been substantially reduced.
Conclusion:
The college meets the Standard.

The Written Report states:
"While the team report indicated in its conclusion that CCSF was in compliance with Standard I.B.3, the narrative described only partial compliance and supported the Commission's conclusion this standard was not met."
In support of its statement that the narrative described only partial compliance, the Commission wrote (Pages 82-83 – emphasis added):
"For example, the institution had developed a revised planning process that would, when fully implemented, assess progress and use that assessment in a continuous cycle of evaluation, planning, resource allocation, and re-evaluation. While the team felt the described system would be adequate, it also found the issues with fiscal resources and governance roles and structures had hampered use of the planning system. At the time of the review, the complete resource allocation process had not occurred, and the team noted it was not clear whether the process would be effective when it was conducted in the future. Also, the Annual Plan – which would

use the results of program review and resource priorities – was still being developed for adoption in the future."

The 2012 Team Report found that CCSF had in place and was using a multi-faceted program for assessing progress in improving institutional effectiveness. The Board of Trustees had an Institutional Effectiveness Committee (page 24). Analyses of student achievement and institutional effectiveness were provided by the college's Office of Research and Planning (page 26). Recently identified gaps in institutional assessment resulted in the development of a modified CCSF End-of-Year Report. An End-of-Year Assessment Report was then being prepared for 2011-12. The college used a program review process as its primary method by which to measure institutional effectiveness of its broad education purpose, student learning programs and services, and student learning (page 28).

The report found that CCSF made decisions regarding the improvement of institutional effectiveness in an ongoing, systematic, and comprehensive decision-making cycle. CCSF had previously adopted its 2011-2016 Strategic Plan. Pursuant to this plan, the college adopted Annual Plans. (Page 25). The Annual Plans called for the preparation of year-end reports, designed to report on progress made on the annual plan and to aid in the making of decisions for the upcoming year. (Pages 25, 26). In addition, the college required all departments to engage in the program review process. The process was overseen by the Program Review Committee. (Page 28).

The report found that CCSF based its decisions on data. The college's Office of Research and Planning maintained an online data bank called the Decision Support System (DSS), which was used regularly and frequently by college employees (Page 26). Some college departments used data for dialogue and planning more effectively than others. The college was working to improve utilization of such data. (Pages 26-27).

The report concluded that the college partially met Standard I.B. However, the Report did not identify any deficiency in meeting Standard I.B.3 in connection with this conclusion. Thee 2013 Report's discussion under this standard was succinct. The Report stated (Page 14): "No deficiency was found in the March 2012 Evaluation Visit. No deficiency was found during the Show Cause Visit."

The 2013 Team Report noted that the 2012 Team Report had found some shortcomings that related to the implementation of the processes required by Standard I.B.3, but explained that the 2012 Report addressed those shortcomings with regard to other standards. In this regard, the 2013 Report stated (Page 14):

"Regardless, a number of factors related to other parts of the Accreditation Standards, such as fiscal resource issues and the need to clearly define governance roles and structure had hampered the use of the planning system. These problems were addressed in the March 2012 Evaluation Report related to those Standards."

The 2013 Report did not say that those problems continued to hamper the use of the planning system in 2013. On the contrary, the Report then explained (page 15): "At the time of the Show Cause Visit, it was clear that (1) the planning system had been strengthened beyond the adequate system that was in place in 2012, and (2) the fiscal and governance issues that had hindered the use of the system had been substantially reduced."

The Commission's conclusion is based primarily on the Commission's finding that CCSF has adopted a revised planning process and it is a work in progress without a track record of

successful implementation. . The record does not support that 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 policies. The institution describes its degrees and certificates in terms of their purpose, content, course requirements, and expected student learning outcomes. In every class section students receive a course syllabus that specifies learning outcomes consistent with those in the institution's officially approved course outline.*
The Team Report provides:

  Findings and Evidence:

As noted in section 4.7, p. 52 of the college's Faculty Handbook, all faculty are required to provide students with relevant course information regarding the student learning outcomes for each course. Faculty must provide a copy of their course syllabi to the department chairperson, who checks for compliance. SLOs for all courses are also posted on departments' assessment web sites and are available through the college outcomes web site.

On February 28, 2013, the Board of Trustees reviewed a new Academic Policy and Process for Program Revitalization, Suspension and/or Discontinuance. This policy includes provisions to allow students in programs that are discontinued to complete their education in a timely manner.

Conclusion:
The college meets the Standard.

The Visiting Team found regarding Recommendation 4:
The college has made exceptional progress towards addressing this recommendation. Student learning outcomes have been defined for nearly all courses, programs, support units, general education areas, and at the institutional level. There is robust dialog regarding student learning outcomes and assessment across the college and this dialog has been transformative for the college culture. The college has plans in place to build on and institutionalize its progress through changes in relevant policies and procedures, and the hiring of a permanent Student Learning Outcomes Coordinator.

Conclusion:
The college has addressed this recommendation.

ACCJC's Written Response provides:

The Commission found that for the nearly 25% of courses for which there are no SLOs in the course outline of record, the institution cannot comply with the requirement that course syllabi given to students in every class section include SLOs consistent with those in the course outline of record or that the SLOs be articulated with transfer institutions. In addition, while the board of trustees had reviewed a proposed program suspension and discontinuance policy, which would provide for the needs of students in those programs, no policy was adopted or being implemented. The Commission concluded CCSF does not meet Standard 11.A.6.

As will be shown below, ACCJC's conclusion appears to be based on inaccurate and incomplete data   ACCJC's conclusions also are inconsistent with ACCJC's own guidance and inappropriately hold CCSF to a higher standard than other colleges at that point in time.

The 2012 Manual for Institutional Self Evaluation (9/2012 edition, p. 13) provides: "The Commission has announced expectations with regard to performance discussed in the Rubric. The Commission expects that all institutions be at the Proficiency level in the identification, assessment, and use for improvements of SLOs by Fall 2012/Spring 2013

Proficiency Rubric (2012 Manual for Institutional Self Evaluation (9/2012 edition, Appendix A)).

- Student learning outcomes and authentic assessments are in place for courses, programs, support services, certificates and degrees.

- 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 for ILO assessment.
- Further clarification by phone with Krista Johns indicated that we had underreported our progress here, and a reassessment gave us a score of 3. We were counting only deep-read college-wide assessments, whereas we were allowed to consider this assessment to be ongoing if courses and programs are mapped to the ILOs/GEOs and those are being assessed. Since that was true for all GEOs (since Fall 2012), but not ILOs, we had 29/42 ILOs/GELOs under assessment – 69%, which puts us by ACCJC rubric at the time with a satisfactory score of 3.
- Score of 2 on comprehensive assessment reports…
- Krista Johns' explanation: The key to understanding this low score is twofold: 1) the reporting structure was new and hadn't been around long enough to provide long-term data and, more importantly, 2) CCSF did not analyze the report data to determine college-wide trends and then report on those trends in such a way that we could
- Discuss them and include them in strategic planning and college-wide initiatives.
- What's missing here is the strategic element of examining overall college-wide student learning and having that information be part of conversations happening at all levels of the college. CCSF got kudos for having the conversations at the department level, but need work on extending them upwards, to schools, across divisions, and across the entire college.
- The following evidence, based on work and results in place at the time of the June 2013 ACCJC meeting substantiate CCSF's continued compliance with ACCJC SLO expectations.

June 2, 2013 assessment reporting deadline results:
- http://www.ccsf.edu/dam/Organizational_Assets/About_CCSF/outcomes_assessment/reports/ReportSummary2013August31.pdf
- Actual reports: http://instruction.ccsf.edu/SLOReports/course_slo_overview.php
- COURSES:
- ~95% of courses reported (1679 reports)
- 95.6% are at stage 2 or higher (undergoing assessment – PROFICIENCY minimum)
- 50.6% are at stage 5 (closed-loop ongoing assessment – SUSTAINABLE CQI minimum)

- 1. SLOs are developed and regularly updated – 4%
- 2. SLO assessments are developed and in use – 10%
- 3. SLO assessment data/results are being analyzed and discussed – 16%
- 4. Changes are being implemented and course will be reassessed – 19%
- 5. Course has undergone at least one full closed -loop cycle, and assessment is continual – 50%
- INSTRUCTIONAL PROGRAMS:
- ~93% of instructional programs reported (311 reports)
- 95.7% are at stage 2 or higher (undergoing assessment – PROFICIENCY minimum)
- 19% are at stage 5 (closed-loop ongoing assessment – SUSTAINABLE CQI minimum)
- 1. SLOs are developed and regularly updated – 4%
- 2. SLO assessments are developed and in use – 18%
- 3. Assessment data/results are being analyzed and discussed – 38%
- 4. Changes are being implemented and program will be reassessed – 19%
- 5. Program has undergone at least one full closed -loop cycle, and assessment is continual – 19%
- 96% of faculty -submitted course assessment reports had outcomes. By ACCJC standards 95% is sufficient to have passed the proficiency mark.
-
- Based on the information provided above, and the comparison report provided by Krista Johns at the ACCJC (http://www.ccsf.edu/dam/Organizational_Assets/About_CCSF/outcomes_assessment/accjc_slo_report/Feedback%20Memo%20on%20College%20Status%20Report%20on%20SLO%20Implementation.pdf), CCSF was operating at an overall proficiency level based on ACCJC expectations throughout the region. Overall average score across all their colleges: 3.44. Overall average score for CCSF: 3.42. (3 is meeting the minimum level for meeting the standard).·
- The Visiting Team's said: "In less than 25 percent of the course outlines sampled, course SLO documentation references outlines list "course objectives" rather than "major learning outcomes." This does not mean, as ACCJC says, that CCSF is noncompliant on 25% of the courses. Outlines created by faculty between 2000 and 2005 contained "objectives" – defined as what the student would be able to do after completion of the course. These "objectives" are synonymous with what are now commonly referred to as SLO's. Thus, CCSF's compliance was underreported and ACCJC mischaracterized and continues to mischaracterize CCSF's progress as of 2013.
- ACCJC in its written report does not consider that the Visting Team noted that "this issue arose only with older course outlines. All outlines approved since 2005 list major learning outcomes. Furthermore, CCSF had a policy in place whereby no courses with outcomes older than 2000 could be taught after 2013. And curriculum processes required that all outlines have clearly defined SLOs.
- Data show for courses that were active in 2013:

	Course Count	%
No outline or UNK	29	1.1
Pre-2000 outlines	378	14.4

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_repo
rt/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 example many colleges 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 that, for CCSF, a SLO had to be in the course outline of record in
order for it to count. This standard was not applied statewide in 2013.
.
The Written Response also indicates that CCSF lacked an approved policy for program
suspension and discontinuance. The Written Report says:
"In addition, the team noted the board of trustees had reviewed a proposed new policy for
program suspension and/or discontinuance." In fact, this is an incorrect statement. The Board
policy for Program Revitalization , Suspension or Discountenance and corresponding
administrative procedure were approved on May 23, 2013. This policy was in effect when
ACCJC met to take action on the Show Cause Report in June 2013.

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

Additional Evidence:
Counseling
http://www.ccsf.edu/en/student-services/student-counseling.html
6/8/2015 22:08:13
BIO9 (Human Biology) Faculty began collecting SLO data and discussing routinely in
2010. We prepared this report detailing the work we had done in the Spring of 2012 to
share with the Biology Department. This data was shared and discussed at the Fall
2012 Dept. Meeting.

https://sites.google.com/a/mail.ccsf.edu/bio9-instructor-
resources/slos/Biology%20Dept%20Course%20SLO%20BIO9.doc?attredirects=0&d=1
6/8/2015 22:14:43
Meeting Minutes from BIO Dept. Meetings where SLO's were discussed (dialog). These
are from Fall 2011 - Fall 2012
http://www.ccsf.edu/dam/Organizational_Assets/Department/Biology/Archives/Departm
entMinutes/Fall%202011.pdf

http://www.ccsf.edu/dam/Organizational_Assets/Department/Biology/Archives/Departm
entMinutes/Spring%202012.pdf

http://www.ccsf.edu/dam/Organizational_Assets/Department/Biology/Archives/Departm
entMinutes/Fall%202012.pdf
Foreign Languages
Program Review blank form for use in 2008-2009 references "assessment of student
learning" (that is what we do when we assess student learning outcomes): (see #5)
http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grant
s/Program%20Review%202009-2010/APRF2008_09Blank.pdf

Plans   for   FL   Dept   SLO   assessments:
ftp://advancement.ccsf.edu/ProReviews2010/School%20of%20Liberal%20Arts/ForLang
/ForLangAttA/

Foreign Languages Dept Program Review references discussion of student learning
outcomes.2009-
2010:http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_
Grants/Program%20Review%202009-2010/ForLangPR09-10.pdf

2010-2011 (Discussion of student outcomes and plans for improvement):
http://www.ccsf.edu/dam/Organizational_Assets/DepartmentResearch_Planning_Grants
Program%20Review%202010-
2011/Unit%20Review/ForeignLanguages_main_20110216_114631.pdf

2012-2013: (Discussion of plans for improvement after discussion of student learning
outcomes):

http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grant
s/Program%20Review%202010-
2011/Unit%20Review/ForeignLanguages_main_20110216_114631.pdf

2013-2014:   (Discussion   of   SLO   reporting):
http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grant
s/Program%20Review%202010-
2011/Unit%20Review/ForeignLanguages_main_20110216_114631.pdf
6/14/2015 23:05:05
English
Some English Department Pre-2012 Outcomes Documents
ENGL   1B   and   Research
https://sites.google.com/site/someccsfenglishstuff/home/outcomes/1B%20Students%20
and%20Research%20Skills.pdf?attredirects=0&d=1
ENGL 1A
https://sites.google.com/site/someccsfenglishstuff/home/outcomes/English1Asp11.pdf?
attredirects=0&d=1
ENGL 90/91 Portfolio Assessments: Data and Reflection

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%20Sco ring%20Report%20May%202011.doc?dl=0

ENGL 1A/961A Scoring Data

https://www.dropbox.com/s/x8a7ppp282e77iz/1A%20and%20961A%20Essay%20Scori ng%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%20Re search%20Brief-Student%20Survey%20May%202010.pdf?attredirects=0&d=1

ENGL L readiness

https://sites.google.com/site/someccsfenglishstuff/home/outcomes/English%20L%20Stu dent%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 productively for years:

https://www.dropbox.com/s/myyv7iarve26gd9/20%20May%202015%20Avg%20See%2 0Reader%20Report.pdf?dl=0

https://www.dropbox.com/s/8zsmcqo7t68rn4u/RPscreeningcompared11may15.pdf?dl=0

6/18/2015 15:32:59

http://www.ccsf.edu/Departments/English/labpage/labit.pdf

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.c alendar.google.com&ctz=America/Los_Angeles

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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/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/Sound-Recording-revise-1_Cert_of_Accompl_SMC.pdf

4.
http://www.ccsf.edu/dam/ccsf/images/academic_senate/AS_Docs/ListOfMeetings_2014_15/Accreditation/Injunction_Response_Evidence/Broadcast_Electronic_Media_Arts/BCST-126-revise-1_SMC.pdf

5.
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

6.
http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/Program%20Review%202009-2010/BEMAPR09-10.pdf

STUDENT DEVELOPMENT DIVISION

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.

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

NOTE: Includes materials prepared for entire Student Development Division.

Includes progress reports, summaries, reports from Student Health SLO team meeting (2008), FLEX workshop notes (2008), Martix for Student Health of SLO Departmental Outcomes (no date, last item in binder)
AND
Student Development SLO Task Force minutes (2009), Student Development SLO (2007), Student Development SLO Research Guide (CCSF document, no date), Student Development Initial Inventory of SLO (2004)

Standard II.B.4 *The institution evaluates student support services to assure their adequacy in meeting identified student needs. Evaluation of these services provides evidence that they contribute to the achievement of student learning outcomes. The institution uses the results of these evaluations as the basis for improvement.*

The Team Report says:

The Show Cause Visiting Team found that Instructional and Student Support Services has engaged in a systematic assessment and planning process that includes effective program review. In the most recent College Status Report of Student Learning Outcomes Implementation (March 2013), Student Support Services reported 100 percent of departments with defined learning outcomes; 96 percent departments with ongoing SLO assessment; and, 28 percent of departments having achieved closed loop continuous quality improvement.

The Show Cause Visiting Team noted the college's expanded support of the SLO development and assessment process by providing .8 FTE release time

for this effort. The two faculty (SLO Coordinator, .6 FTE and librarian faculty, .2 FTE) working with the SLO Committee have done outstanding work. In addition, the Student Support Services faculty, staff and administrators have made headway in a short period of time.
Conclusion:
The college meets the Standard.

The Written Report takes excerpts from the 2013 Team Report discussion of Standard IV.B and combines these excerpts with excerpts from other standards to discount and discredit the findings of the visiting team.   ACCJC undertakes a selective and strained reading of the Team Report to conclude that CCSF does not meet the standard.

The 2013 Team Report represented a dramatic improvement over the conditions described in the 2012 Report. The 2013 Report cited no shortcomings in CCSF's compliance with this standard and concluded that CCSF met Standard II.B.4. (Pages 31-32).
In relation to other standards, the 2013 Report made observations that ACCJC has interpreted as being relevant to Standard II.B.4. Specifically, under II.B.1., the 2013 Team Report stated (pages 27-28):
"The Student Support Services team has engaged in comprehensive, reflective dialog about the types of services need and how to deliver the services to the primary campus and all eight centers. Based on these discussions and planning sessions, Student Support Services staff have concluded that a comprehensive needs assessment must be completed by the end of the fall 2013 semester."

However, this observation demonstrates a particular instance in which CCSF "systematically assesses student support services using ... faculty and staff input, and other appropriate measures in order to improve the effectiveness of these services." When a standard requires the institution to evaluate its services, and when the institution does this, identifies a shortcoming in its services, and looks for ways to improve, this can only be viewed as successful compliance with the standard, not a failure to meet the standard.

In addition, under II.B.3, the 2013 Review Team Report stated (page 30):
"Student Support Services administrators have engaged in extensive campus-wide dialogue, program review, and student learning outcomes assessment to inform changes to its delivery model. The process and methods used to identify the support needs of the students are outlined in the Student Support Services Reorganization Report, which was updated in December 2012. Discussion have been across divisions and across units. The result has been improved student service delivery...." This is another instance in which CCSF "systematically assesses student support services using ... faculty and staff input, and other appropriate measures in order to improve the effectiveness of these services."

The 2013 Team Report also addressed CCSF's response to Recommendation 5. Here, the 2013 Team Report stated, "Overall, the institution has made significant progress." However, the 2013 Report noted that resource constraints – including "inadequate budget, transition of senior administration and Board of Trustee performance" – limited CCSF's ability to implement

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 a "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.

Additional evidence

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
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Standard IIIB. *Physical Resources which include facilities, equipment, land , and other assets support student learning programs and services and improve institutional effectiveness. Physical resource planning is integrated with institutional planning.*

Standard III.B.1. *The institution provides safe and sufficient physical resources that support and assure the integrity and quality of its programs and services, regardless of location or means of delivery.*

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 IIl.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, 201 1 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 prioritized based on the 2010 facilities condition assessment data (a study commissioned by the California Community College Chancellor's Office), budget cuts called into question the adequacy of the funding allocation to address deferred maintenance items.
However, with the passage of the local parcel tax, the Board of Trustees at its meeting on February 2013 approved substantial funding for maintenance, which should allow Building and Grounds to tackle the projects in the queue to improve physical resources.
Conclusion:
The college meets the Standard.

In its Written Report, the Commission concluded that the college did not meet this standard. The Commission noted that the 2013 Report reviewed the current conditions of the college's

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 with III.B.1 (pages 42-43) , there was no need to address this second part of the recommendation.

Solely on the basis of its discussion of part one of the recommendation where it found CCSF's work on the TCO model to be a work in progress, the Report concluded that CCSF had partially addressed Recommendation 8. (Pages 72-73)

ACCJC does not Provide Substantial Evidence for its Conclusion

The Commission's discussion of this Standard in its Written Report does not in all respects accurately portray the evidence that it purports to cite. Specifically, the Commission's Supplemental Report claims that the 2013 Team Report provides evidence that questions the adequacy of funding for the facilities projects planned based on the 2010 assessment, even after the recent passage of the parcel tax measure. What the Commission's Written Report fails to mention is that in February 2013, the Board of Trustees actually approved

"substantial funding" for these projects, and the 2013 Report concluded that this approved funding "should allow Building and Grounds to tackle the projects in the queue to improve physical resources." Since there is no evidence to the contrary, it must be presumed that when the Board of Trustees approved the funding, they approved a specified amount based on reasonable estimates of the dollar costs of the projects that were intended to be completed, and that a reasonable assessment would show that the funding would most likely cover those costs. There is no evidence in any report to support a contrary determination. (2013 Report, pages 42-43).

Therefore, the Commission's finding questioning the sufficiency of the funding to pay for the deferred repair and maintenance projects is not supported by the evidence. The Commission's Written Report also cites evidence in support of its conclusion on this standard that is relevant to Standard III.B.2 but not relevant to III.B.1. III.B.1 deals with current conditions of facilities and short-term needs for maintenance and repair. III.B.2 deals with future planning for facilities and physical resources and the evaluation of such facilities for improvements.

In its discussion of the introductory paragraph in Standard III.B.2., the 2013 Team Report confirmed that future planning is the focus of Standard III.B.2. In its discussion of the introductory paragraph to III.B.2., the Report expressed concern about CCSF's lack of funding to continue to retain the firm that had helped CCSF to develop its long-term facilities plans. It also expressed concern for a shortage of funds for other future uses relating to facilities. About this concern, the report stated that "the college's ability to maintain the facilities resources necessary to support programs and services is uncertain." (Page 43).

The only reasonable inference is that this finding of "uncertainty" was made because this finding was about funding that might or might not be available in the long-term future for projects that might or might not be very costly. In contrast, only several paragraphs earlier, on the same page, the Report concluded that CCSF had enough funding to support a conclusion that funding "should allow" the college to complete the short term repair and maintenance that was then planned. That finding was based on information as to the amount of funds actually approved by the Board of Trustees for near term projects, and it may be presumed that in approving that amount, the Board of Trustees and the 2013 review team had available to them reasonable estimates as to the dollar cost of the intended projects. The Commission also relied on the 2013 Report's criticism under III.B.2 that "Workgroup 15 ... chose not to submit program review reports for each center because the program review format did not lend itself to address center needs." (2013 Report, page 44; Supp. Report, page 86). Standard III.B.2's additional focus is set forth in III.B.2. That sub-paragraph states (page 43):

"Physical resource planning is integrated with institutional planning. The institution systematically assesses the effective use of physical resources and uses the results of the evaluation as the basis for improvement."

The program review finding cited by the Commission is relevant to III.B.2.b. It is not relevant to III.B.1.

The Commission also relied on the 2013 Team Report's finding, made in the Report's discussion of CCSF's response to Recommendation 8, that CCSF's work on the TCO model was a work in progress. As noted above, the 2013 Report's discussion of Recommendation

8 was limited to the TCO issue, and that issue was relevant to III.B.2, but not to III.B.1. That finding does not support the Commission's conclusion on III.B.1..

Therefore, none of the evidence cited by the Commission from the 2013 Report's discussion of III.B.2 is relevant to III.B.1, and none of that evidence supports the Commission's conclusion in its Supplemental Report that CCSF did not meet Standard III.B.1. Accordingly, the Commission is respectfully requested to revise its determination and conclude that City College meets this standard.

Standard III.C.1. *The institution assures that any technology support it provides is designed to meet the needs of learning, teaching, college-wide communications, research, and operational systems.*
Standard III.C.1.a. *Technology services, professional support, facilities, hardware, and software are designed to enhance the operation and effectiveness of the institution.*

The Visiting Team report provides:

Findings and Evidence:
During the March 2012 Evaluation Visit, the college was found to not comply with this standard due to network and lab security breaches. At the time of the Show Cause
Visit, based on discussions with information technology (IT) personnel and a review of the ITPC minutes, the team was able to document that the college had upgraded its firewall software and effectively addressed the security issues.
Conclusion:
The college meets the Standards.
Standard Ill.C.1.b *The institution provides quality training in the effective application of its information technology to students and personnel.*
Standard Ill.C.1.c *The institution systematically plans, acquires, maintains, and upgrades or replaces technology infrastructure and equipment to meet institutional needs.*
Findings and Evidence:
During the March 2012 Evaluation Visit, the college was found to not comply with this standard due to the failure to integrate into the ongoing general fund budget plans the total cost of technology acquisition and maintenance, including regular replacement of outdated hardware. The college was not conducting planning based on available ongoing funding sources. The college relied on one-time grants and bond funding.
At the time of the Show Cause Visit, the college had implemented changes to the program review and college planning processes as discussed in Standard I.B.3-4. The revised processes now integrate technology needs, both new and replacement, into the planning and budgeting processes using identified funding sources. A funding model for the next eight years was created and is the basis for the tentatively adopted for the 2013-2014 budget that includes new funding for technology that is sufficient to fund the total cost of technology

acquisition and maintenance, including regular replacement of outdated hardware. The eight-year financial stability plan identifies resources to mitigate, if not eliminate, total reliance on grants and other one-time resources to acquire and upgrade technology.

Conclusion:
The college meets the Standards.
Standard 111.C.1.d *The distribution and utilization of technology resources support the development, maintenance, and enhancement of its programs and services.*
Findings and Evidence:
The March 2012 Evaluation Visit determined that the college did not comply with the Standard due to discretionary resources being too limited to finance college priorities and goals.
The passage of Proposition A, the CCSF local parcel tax, is projected to generate revenue of about $16 million per year for the next eight years. This supplemental revenue and the college's Plan for Long-Term Stability make it possible to acquire, distribute and utilize technology resources to develop, support and enhance college programs and services. The college now has resources to finance college technology priorities and goals established using integrated processes for program review, planning and budgeting.
Conclusion:
The college meets the Standard.

The Written Report rejects the recommendation of the Visiting Team. As it does in many areas of the Written Report, ACCJC ignores the language provided by the Visiting Team in the relevant section and refers to another section of the team report to support its argument. The Written Report states that "team noted in the narrative for Standard III.C.1.b and c, that the college's integrated planning system was not yet in place."

The Narrative does not say this. It says that while the March 2012 team found noncompliance, the 2013 the team report says "At the time of the Show Cause visit, the college had implemented changes … The planning and budgeting processes now integrate technology needs , both new and replacement, into the planning and budgeting processes using identified funding sources." This finding completely contradicts the Written Report; the Written Report is not supported by evidence.

Next, the Written Report says:
In its discussion of Standard III.B.3, the team noted that the Banner system was five versions older than the current release. The team stated: "This is a significant detriment to the ability of Instructional Services and Student Support Services to provide effective and efficient information and services to support learning." *In addition, the college had not fully resolved the issue of securing and storing student files,   reportedly due to budget and IT staffing constraints. When acquired and implemented in the future, the updated Banner system was expected to fulfill the need to maintain and securely store student files. In the narrative for Standard 11.C.2, the team noted that weaknesses in Banner programming and support were an issue.*

The chart below, shows what were the then-current versions of the different modules within Banner.   (Sent by then-CTO Erick Raznick in an email dated April 29, 2013 12:03 PM)
The chart clearly shows that CCSF was not running software that was "five versions older than the current release".   Release notation follows a standard.
The version of Banner run by CCSF was Banner 8 which was current at the time. The minor release versions (referred to as "dot releases" since they are to the right of the period), with the exception of Finance (and CALB Student- which was not in use), were all less than 5 iterations older than the most current. It is established practice in maintaining Enterprise Resource Planning (ERP) systems that not all dot releases are put into production as they are released. Many times they do not have relevant updates and it is common to wait until one or more are released before applying them.
Areas such as Financial Aid, which depend heavily on regulatory-based updates, will put new releases into production as they are made available. The chart below shows that Financial Aid was already up to date in their current production version. It demonstrates that the College kept to an appropriate level of software upgrading.

Banner Product	April 2013	October 2013
General	8.3	8.5.2
Accounts Receivable	8.3	
Student	8.2	8.5.6
Position Control	8.6	8.8
Finance	8.3	8.8
Human Resources (Payroll)	8.6/8.6.1/8.8.1	8.8
Financial Aid	8.16	8.16
Integration Components Release		
Web Tailor Release	8.2	8.5.2
Web General Release	8.2	8.5.2
Student Self- Service Release	8.2	8.5.4
Financial Aid Self-Service Release	8.15	8.16
Faculty & Advisors Self-Service Release	8.2	8.5.4
Finance Self-Service Release	8.2	8.6
Employee Self-Service Release	8.6/8.6.1/8.8.1	8.8

Banner Document Management Suite (BDMS)	8.3	8.4
SC-California-REPT	8.0	8.2
SC-California-CALBSTU	8.2	8.7
SC-California-CALBFA		8.0
SC-California-CALBHR	8.4	8.6
SC-Europe-SSEN (Self-Service Engine)		8.0.2
SC-Europe-PRGN (Process Rules Engine)		8.0.0/8.0.1
Mass Data Update Utility (MDUU)		8.0
ApplicationXtender - Desktop		
ApplicationXtender - Web Access .NET		

The Written Report states: While technology funding appeared available for the next several years under Proposition A, the demonstration of its use for technology needs was not yet available." This statement is an excellent example of how ACCJC twists language to attempt to create evidence where none exists. What does it mean for funding to "appear to be available"? It means there is funding available. And what does it mean that "demonstration of its use was not yet available"? It can only mean that CCSF has not yet spent the money. ACCJC appears to be saying that since the future money had not yet been spent, it was not possible for CCSF to establish that it would spend the money in the future. This goes beyond speculation by ACCJC; it is essentially requiring CCSF to prove that it will spend money at some future date. Clearly, this is a nonsensical expectation. As the review team said: "CCSF now has a long-term revenue source available to fund new and replacement technology based on institutional assessment and planning, which brings the college into compliance with the Standard." CCSF has established it has the resources and is prepared to expend the resources as needed. It is literally impossible for CCSF to demonstrate it will do this in the future.

The 2013 Report identified each of the separate parts in Standard III.C.1. It addressed the introductory paragraph to III.C.1 along with III.C.1.A. Separately from those two parts, it addressed III.C.1.b and III.C.1.c together, and separately from those two parts, it addressed III.C.1.d. With regard to the introductory paragraph to III.C.1 and sub-paragraph III.C.1.a, the 2013 Report noted that the only deficiency found in 2012 was based on the college's inadequate response to network and lab security breaches. The 2013 Report then stated (page 45):
"At the time of the Show Cause Visit, based on discussions with information technology (IT) personnel and a review of the ITPC minutes, the team was able to document that the college had upgraded its firewall software and effectively addressed the security issues."

The 2013 Report also addressed CCSF's compliance with III.C.1. b., c., and d., and found that CCSF met each of these standards. Sub-paragraph b requires quality training, c requires systematic planning, and d requires that "the distribution and utilization of technology resources support the development, maintenance, and enhancement of its programs and services. The 2013 Report found that all of these requirements were met. (Pages 45-46). Specifically, the Report found that:

"At the time of the Show Cause Visit, the college had implemented changes to the program review and college planning processes as discussed in Standard I.B.3-4 [2013 Report, pages 14-17]. The revised processes now integrate technology needs, both new and replacement, into the planning and budgeting processes using identified funding sources."

(Page 46). In addition, the 2013 Report found that the passage of the Proposition A parcel tax assured CCSF of adequate revenues for the next 8 years in order to maintain and upgrade technology resources. (Page 46).

The Written Report cited evidence that it purported to find in the 2013 Report in support of its conclusion that CCSF did not meet Standard III.C.1. None of this claimed supporting evidence was found in the Report's discussion of Standard IIIl.C.1 and the III.C.1 sub-parts. All of it came from other sections of the report.

The Written Report asserted that "the description of current conditions did not demonstrate compliance." There was no basis for this claim. The ACCJC must support with sufficient evidence any conclusion that CCSF has not met a standard. If there is no such evidence, or no evidence at all, provided, then it must be assumed that CCSF has met the standard. In this case, the 2013 Report included evidence to support its conclusion that CCSF had met the standard. The Report did not provide evidence as to compliance with all aspects of the standard, but that was not required in order to find that CCSF met the standard.

The Written Report asserted that, "As discussed with previous standards in Section Three of this report, the team report noted issues with consistency and full application of program reviews, lack of linkage between planning and resource allocation, and the incomplete Educational Master Plan." (Page 88). This mere statement that there is an "issue" with CCSF's efforts at compliance in any particular area does not provide enough factual information on which to base any conclusion that the efforts at compliance are so inadequate as to support a finding of non-compliance with a standard. In addition, the Commission's statement that there is an "issue" with those general categories does not say how that "issue" bears in any way on CCSF's implementation of its IT resources.

The Written Report asserted that "the team noted in the narrative for Standard III.C.1.b and c., that the college's integrated planning system was not yet in place." (Page 87). There is no such statement in that narrative. On the contrary, the team's narrative for III.C.1.b and c states the "The revised processes now integrate technology needs, both new and replacement, into the planning and budgeting processes...." The 2013 Report provides additional factual support for its approval of CCSF's planning processes for technology resources, both in the narrative under III.C.1 and in its discussion of CCSF's response to Recommendation 9. (Pages 46 and 73).

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

Additional Evidence

CCSF employs high-quality technology throughout the college.

http://www.ccsf.edu/Departments/English/labpage/labit.pdf
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.3-4, 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 technology based on institutional assessment and planning, which brings the college into compliance with the Standard.

Conclusion:
The college meets the standard.

As in so many cases, ACCJC has no specific evidence related to Standard III.C.2. Instead, ACCJC repeats its opinion that the new planning process was not yet fully implemented. Again, as previously explained, in 2012, in response to ACCJC's direction, CCSF recreated its entire planning process. the review team evaluated this process and determined that it meets the Standard. ACCJC did not disagree but concluded that not enough time had passed to find the the process was "fully implemented". ACCJC's decision was based on the lack of the passage of time, something entirely beyond the control of CCSF. However, it is completely unreasonable to terminate a college because not enough time had passed to prove the long-term value of effective practices.

ACCJC also refers to "a number of references in the team report to inadequacies of technology services that were previously identified but had not been addressed". The Final Injunction and Order directed ACCJC to "clearly identify" deficiencies and "set forth the evidence". Vague references to the team report do not meet the court's requirements. This lack of specificity is particularly noteworthy given that the team found CCSF in compliance. If ACCJC is going to reject the findings of the visiting team it is obligated to clearly explain its rationale so CCSF has an opportunity to to provide contrary evidence.

The Written Report again states: While technology funding appeared available for the next several years under Proposition A, the demonstration of its use for technology needs was not yet available." As previously explained, ACCJC has twisted its language to attempt to create evidence where none exists. The review team plainly stated that funding is available. ACCJC appears to be saying that since the future money had not yet been spent, it was not possible for CCSF to establish that it would spend the money in the future. This goes beyond speculation by ACCJC; it is essentially requiring CCSF to prove that it will spend money at some future date. Clearly, this is a nonsensical expectation. CCSF has established it has the resources and is prepared to expend the resources as needed. As the review team said: "CCSF now has a long-term revenue source available to fund new and replacement technology based on institutional assessment and planning, which brings the college into compliance with the Standard." In 2013, it was and still is, literally impossible for CCSF to have proven that it would spend money in the future.

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

Standard IV. Leadership and Governance

Standard IV.A.1. *Institutional leaders create an environment for empowerment, innovation, and institutional excellence. They encourage staff, faculty, administrators, and students, no matter what their official titles, to take initiative in improving the practices, programs, and services in which they are involved. When ideas for improvement have policy or significant institution-wide implications, systematic participative processes are used to assure effective discussion, planning, and implementation.*
 "The Team Report says:

T**he 2012 Evaluation Team cited deficiencies that the college must mitigate in order to fully meet the Standard. The cited deficiencies centered on ineffective decision- making processes tied to the existing governance structure of the college. The 2012 Evaluation Team noted unclear, cumbersome, and opaque processes, along with ambiguous assignments and applications of roles and responsibilities among the college constituencies. Responding to Recommendation 13 from the March 2012 Evaluation Team, the college has evaluated its long-standing governance structure, and, through new Board Policies, has significantly revised the governance structure. The college initiated implementation of the revised governance structure in January 2013, and the**

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 the Academic 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 that decisions 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 sincerely engaged in implementation of the governance structure and that they are working collaboratively to improve decision making.

Conclusion:

The college meets the Standard.

While the need for quick action and decisions in responding to deficiencies related to meeting Accreditation Standards may have triggered concern among some individuals and constituencies regarding intentions and processes attendant to governance and decision making, the college has defined and is implementing an inclusive governance structure, based on a comprehensive evaluation of the old structure. It is too early to declare the revised structure effective, but the college has met the Standard.

The Written Report essentially concedes that CCSF has a governance structure that meets ACCJC's standards but it has not been in place long enough. The Written Report concludes: "it is too early to know whether the implemented changes will bring about conditions at the college that comply with Standard IV.1. thus, the Commission concluded CCSF does not meet Standard IV.A.1." Here, ACCJC does not even attempt to present evidence. It merely repeats its speculation about the future.

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. If 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 then-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 system 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:

There is wide participation from faculty, classified staff, administrators, and students in institutional governance appropriate to their expertise or their role as a representative of a constituent group. (Pg. 58)

City College of San Francisco has established clearly written policies that delineate the roles and responsibilities of all constituents in the decision-making process. (Pg. 59)

The roles for faculty and administrators for curricular and other educational matters are clearly defined and allow for appropriate input. (Pg. 59)

The college's relationship with the U.S. Department of Education (DOE) is sound. The primary interactions with the DOE are by the Financial Aid Office and the Office of Workforce and Economic Development. These staff members continually participate in training and development events related to accreditation and DOE regulations. (Pg. 60)

The college has an extensive and inclusive shared governance process, and there is general satisfaction indicated by the institutional leaders. (Pg. 60)

City College of San Francisco's Board of Trustees is committed to working with the Academic Senate. In some areas of participatory governance, the board has agreed to the conditions of mutual agreement. In curriculum development, education program development, and standards or policies regarding student preparation and success, however, the board relies primarily on the recommendation of faculty. (Pg. 60)

The visiting team concluded CCSF met the standard. The question then is whether ACCJC decision, to reject the recommendation of the visiting is a reasonable decision under the circumstances. As with many of the other standards, complete evidence of ongoing compliance into the future could not be established in the limited time allowed CCSF. 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. ACCJC's unwillingness to allow reasonable time to comply should not be the basis for termination.

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

Additional Evidence
Senate Report on Governanc**e**

http://www.ccsf.edu/Organizations/Academic_Senate/Report2Faculty2012Oct1.pdf

Examples of Effective Shared Governance in 2010 and 2011
New Academic Renewal Policy
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 2010-2011 (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

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:

Standard II.A.2 (pages 22-24): Once again, the Report acknowledged that CCSF provided a high quality education. Again, after praising CCSF for its progress in implementing the SLO procedures, the only criticism leveled against the college was its failure to complete implementation. Again, there is no criticism of any adverse impact on the quality of education provided.

Standard II.B.1 (page 27): Again, the report notes the excellent improvements that the college made in its student support services since the 2012 report and compliments CCSF for the steps it has taken to enhance those services further. The only negative criticism was CCSF's failure to implement the One Stop model. However, the standard on its face does not require the one stop model, and there is nothing in the report that indicates that indeed, the college was not providing adequate services without the One-Stop model.
Standard III.A.2. – Qualified faculty, staff and administrators (pages 37-38): The report praises the college for working to increase the staff needed to oversee planning and budgeting, without indicating any adverse impact on educational quality, but criticizes the college for not completing the process of filling all vacant positions. The college was seriously engaged in the process of filling positions and simply needed more time to complete the process.
Standard III.B.2a. And III.B.2.b. – physical resource planning (pages 43-45: The Report includes much praise for the work that CCSF has done to comply with this standard. While CCSF was seriously engaged in the planning process, the only criticism was that CCSF had not completed the process.
Standard III.D.1.a. – financial planning (pages 47-48): This is yet another standard where CCSF was found to be fully engaged in the planning process and the only criticism was that CCSF had not completed the process, where inevitably completion of the process would take more than one year.

Standards III.D.1.b and c. – financial planning (pages 48-49): This is yet another pair of standards where CCSF was found to be fully engaged in complying with the standard but had not yet completed the process, where inevitably completion of the process would take more than one year.

Eligibility Requirement 17, Financial Resources (page 63-64) – In this section, the report criticizes CCSF for relying on the parcel tax and state tax measure passed by the voters in November 2012. The Report advises CCSF that it must "implement a lasting strategy to control costs in order to avoid dependence on temporary revenues such as bond measures and local parcel taxes." (Page 64). The Report relies heavily on this criticism for its conclusion that CCSF did not meet this ER.

The problem with this criticism is that there is no such thing as a lasting strategy to control costs, and there is no economic virtue in avoiding the use of bond measures and parcel taxes, even though they be temporary sources of revenue. All revenues come from temporary sources. Balancing the budget is an endlessly recurring task, and the strategy that works one year may not work the next year because educational priorities change, revenues change, costs change, and the local, state-wide and national economy in which the college exists changes. Every institution – particularly every publicly funded institution – is likely to have periods of budget difficulties. The question that needs to be addressed under this eligibility requirement is whether, in light of those realities, the college is on the right course to maintain its financial stability. Finding new temporary sources of income is not a negative in this regard. It is wholly a positive.

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

Conclusion- The 2013 Termination Decision Should be Revoked

As set forth above, ACCJC has not presented substantial evidence to support its finding in the ten areas of deficiency that are the subject of the Written Report and this Response. Therefore, as the Commission engages in reconsideration of its 2013 decision to terminate accreditation, , CCSF should be deemed to be in compliance for those ten areas.

As required by the court order, the Commission must review the entire case holistically. The holistic reconsideration should include the following key principles. First, terminating one of the largest and most successful community colleges in the nation is an extremely drastic and unprecedented act. Such an act should only be taken if the college is in such severe condition that it is unable to provide quality education to students. The 2012 Report found that CCSF had been providing a uniformly high quality education across all of its departments and the 2013 Report in essence reaffirmed that finding. It is stunning to see that a college with such a track record of excellence can be shut down for issues that did not have to lead to termination.

Second, while there was noncompliance with certain standards, termination was entirely unwarranted and undeserved. The evidence provided in this Response

presents a picture of a college, that while not in full compliance, engaged in activities intended to meet the standards. There is evidence of widespread and vigorous dialogue on multiple issues pertinent to ACCJC's decision including the college's mission, program review and planning. CCSF was clearly further along on SLO compliance than was reflected in the 2013 termination action. The college was deeply committed to student learning and success. The additional evidence presented reflects a college that did not deserve to be terminated.
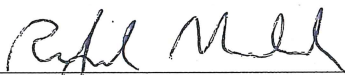
Third, the Commission erred in not providing CCSF with two years to correct the deficiencies identified. It appears that the Commission, in 2013, was acting under the impression that notice of deficiencies had been provided as early as 2006. However, both the United States Department of Education and the Superior Court for the City and County of San Francisco have determined that notice was not provided in 2006. In fact, ACCJC has amended its policies to provide clarity regarding findings of deficiency. CCSF was allowed less than one year to address numerous deficiencies that had not been clearly presented previously. Therefore, the very basis for the 2013 decision was flawed, and CCSF should have been allowed at least an additional year to address any deficiencies. This error is particularly problematic because, as stated herein, it is literally impossible to fully comply a number of the identified deficiencies in less than one year. ACCJC requires sustained compliance that can only be achieved over a longer period of time. This reconsideration presents an opportunity to correct this error and the grave injustice done to CCSF and the entire San Francisco community.

CCSF respectfully requests that the 2013 termination decision be revoked and ACCJC engage with CCSF to establish appropriate steps be taken to carry out CCSF's obligations regarding accreditation going forward.

Susan Lamb, Chancellor
San Francisco Community College District

6/26/15
Date

Rafael Mandelman, President Board of Trustees
San Francisco Community College District

6/26/15
Date