



**ACCREDITING  
COMMISSION  
for COMMUNITY and  
JUNIOR COLLEGES**

*Western Association  
of Schools and Colleges*

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July 2, 2012

Dr. Pamila Fisher  
Interim Chancellor  
City College of San Francisco  
50 Phelan Avenue  
San Francisco, CA 94112

Dear Chancellor Fisher:

The Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges, at its meeting June 6-8, 2012, considered the institutional Self Study Report, the report of the evaluation team which visited City College of San Francisco Monday, March 12-Thursday, March 15, 2012, and the additional materials submitted by the College. The Commission is compelled to order **Show Cause** and to require that the College complete a **Show Cause Report** by **March 15, 2013**. The report will be followed by a visit of Commission representatives. City College of San Francisco is also required to prepare a **Closure Report** by **March 15, 2013**, which is to be submitted with the institution's Show Cause Report. The Commission also requires the College to develop an overall plan of how it will address the mission, institutional assessments, planning and budgeting issues identified in several of the 2012 evaluation team recommendations, and submit a **Special Report** describing the plan by **October 15, 2012**.<sup>1</sup>

City College of San Francisco underwent a comprehensive evaluation in application for reaffirmation of accreditation; reaffirmation is delayed during the Show Cause order. The accredited status of the institution continues during the period of Show Cause and until the Commission acts to terminate accreditation or when issues that gave rise to Show Cause are fully resolved and the institution is removed from sanction.

**Show Cause** is issued when the Commission finds an institution in substantial non-compliance with the Commission's Eligibility Requirements, Accreditation Standards, or policies, or when the institution has not responded to the conditions imposed by the Commission. City College of San Francisco must show cause why its accreditation should not be withdrawn by the Commission at its June 2013 Commission meeting, which is scheduled to occur on or about June 10, by demonstrating that it has corrected the deficiencies noted by the Commission and is in compliance with the Eligibility Requirements, Accreditation Standards, and Commission policies. The burden of proof rests on the institution to demonstrate why its accreditation should be continued.

Dr. Pamela Fisher  
City College of San Francisco  
July 2, 2012

Since the loss of accreditation would likely cause City College of San Francisco to close, during the show cause period, the College must make preparations for closure according to the Commission's *Policy on Closing an Institution*.

Show Cause was ordered for City College of San Francisco (CCSF) because the College has failed to demonstrate that it meets the requirements outlined in a significant number of Eligibility Requirements and Accreditation Standards. It has also failed to implement the eight recommendations of the 2006 evaluation team; five of these eight were only partially addressed, and three were completely unaddressed. The College is reminded that an institution is expected to fully address *all* of the recommendations of a comprehensive evaluation team before the next comprehensive evaluation visit occurs.

In its deliberations, the Commission considered the content of the Evaluation Report, including its findings, conclusions, and recommendations. For specific reference to the Eligibility Requirements and Accreditation Standards that CCSF was found by the evaluation team and the Commission not to meet, either fully or partially, the institution is referred to the Evaluation Report which connects each of its findings, conclusions, and recommendations to the applicable Eligibility Requirements and Accreditation Standards. The Evaluation Report found little evidence of the ongoing assessment, integrated planning, financing/budgeting, and improvement that is required of an accredited institution. The Commission also noted that the funding base for CCSF appears to be inadequate to support the mission of the college as it is currently conceived.

The institution has not implemented a planning process that connects the results of its own needs assessments to the budgeting process, and in some cases relies solely on grants and contracts to provide resources for what should be basic operational expenses. This is documented in many places in the Evaluation Report, including the following statement: "The team was unable to confirm that CCSF maintains and documents a funding base, financial resources and plans for financial development that are adequate to support student learning programs and services, to improve institutional effectiveness, and to assure financial stability." (Evaluation Report, page 18) The Evaluation Report also states that, "the college has not made progress to address a long-standing pattern of late financial audits and deficit spending, which harm the financial integrity of the institution." (Evaluation Report, page 5) The College has not adequately responded to prior year audit reports. (Evaluation Report, page 56)

The Commission is concerned about the institution's ability to successfully adapt to the changing resource environment facing public community colleges and believes that the College has not demonstrated, through its review of the institutional mission, adequate attention to the impact on quality as the resources have declined while broad breadth of its mission has been maintained. The Report states "The lack of self-examination and failure to react to ongoing reduced funding has caused the institution to reach a financial breaking point."

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City College of San Francisco  
July 2, 2012

The College's unrestricted net assets are in a deficit position for the third consecutive year and the deficit continues to grow. Without sufficient cash flow and reserves to maintain financial stability and realistic plans for the future, CCSF will be challenged to maintain financial solvency." (Evaluation Report, page 55) The institution's "short range financial plans do not incorporate plans for payment of future liabilities. The long-range liabilities that have not been considered include post-employment medical benefits (OPEB) and a substantial underfunding of the district's workers compensation self-insurance fund. These liabilities clearly are a threat to the financial stability of the College. The primary reason these issues cannot be resolved is because the unrestricted general fund salaries and benefits exceed 92% of the total expenditures excluding transfers. The remaining 8% is simply not adequate for all other operations and maintenance." (Evaluation Report, page 56)

The Commission is concerned about adequacy of administrative leadership. Many of the administrative staff positions, including the Chancellor position, are filled by temporary employees, and the College lacks adequate numbers of administrators with the appropriate administrative structure and authority to provide oversight and leadership for the institution's operations. (Eligibility Requirement 5) The Evaluation Report notes on page 27, "several barriers to governance and resolution of financial issues that prohibit the effective functioning of some elements of the (planning) system." The Evaluation Report also notes that there is "indirect resistance to board and administrative decision making authority." (Evaluation Report, page 5)

The Commission requires that the College take the necessary steps to address the adequacy and quality of administrative leadership, ensure that there are appropriately defined decision-making roles and responsibilities, and the governing board pays sufficient attention to maintaining educational quality and adequate financial resources to support the educational mission. The Commission is concerned that leadership weaknesses at all levels, and established campus precedents for governance structures, decision-making priorities and processes, have kept City College of San Francisco from adapting to its changed and changing fiscal environment. The Commission requires the institution to act quickly and decisively to make needed changes in governance and decision-making processes.

Some of the institution's challenges in meeting Accreditation Standards were identified through the eight recommendations of the 2006 evaluation team. The 2012 evaluation team found that City College of San Francisco had only partially addressed five, and completely failed to address three of the eight recommendations provided by the 2006 evaluation team. City College of San Francisco has not demonstrated an ability to address evaluation team recommendations in a timely manner and thereby has not demonstrated consistent and reliable compliance with Eligibility Requirements and Accreditation Standards. The 2012 evaluation team has repeated much of the content and intent of the 2006 evaluation team's recommendations as annotated in this action letter.

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City College of San Francisco  
July 2, 2012

The Evaluation Report describes in detail the findings, analysis and conclusions of the 2012 evaluation team. The College is urged to very carefully review the *entire* report and use it as a basis for developing and enacting strategies to come into compliance with accreditation requirements. The March 2013 Show Cause Report should demonstrate that CCSF has addressed all recommendations and Commission concerns expressed in this action letter, resolved all deficiencies, and come into compliance with Eligibility Requirements 5, 17, 18 and 21, and with Accreditation Standards I, II, III and IV, and their specific component parts noted in the recommendations listed below, and has the ability to sustain this compliance.

Evaluation Team Findings on Eligibility Requirements:

**Eligibility Requirement 5 Administrative Capacity**

The college does not have sufficient administrative staff with appropriate experience to support the necessary services for an institution of its size, mission, and purpose.

**Eligibility Requirement 17 Financial Resources**

The institution cannot document a funding base, financial resources or plans for financial development that are adequate to support student learning programs and services, to improve institutional effectiveness, and to assure financial stability.

**Eligibility Requirement 18 Financial Accountability**

The institution fails to conduct audits and provide reports to the college or community in a timely manner. The institution has also failed to implement corrective action to audit findings over multiple years.

**Eligibility Requirement 21 Relations with the Accrediting Commission**

The institution does not adhere to each of the Eligibility Requirements and Accreditation Standards and has failed to follow Commission directives to address the deficiencies noted by the 2006 evaluation team.

Evaluation Team Recommendations:

**Recommendation 1: Mission Statement**

***(Repeats 2006 Recommendation 1)***

To improve effectiveness of Standard I.A Mission, the team recommends that the college establish a prescribed process and timeline to regularly review the mission statement and revise it as necessary. The college should use the mission statement as the benchmark to determine institutional priorities and goals that support and improve academic programs, student support services and student learning effectively linked to a realistic assessment of resources (I.A.3).

Dr. Pamela Fisher

**Recommendation 2: Effective Planning Processes**

***(Repeats 2006 Recommendation 2)***

To fully meet Standard I.B Institutional Effectiveness, the team recommends the college to develop a strategy for fully implementing its existing planning process to look at each campus and site, examine revenues and expenses, and systematically address instructional program planning, staffing requirements, provision of student and library services, including facilities needs and competing priorities. The planning process should include clearly prescribed roles and scope of authority for all governance stakeholders involved in each component of the planning process (I.A.3, I.B.1, I.B.2, I.B.4, I.B.6, II.A.1, II.B.3.a, III.A.2, III.A.6, III.B.2.a-b, III.C.1.a-c, III.C.2, III.D.1.a-c, III.D.2.a-c, III.D.2.g, III.D.3, IV.A.3, IV.A.5, IV.B.1, and IV.2.a).

**Recommendation 3: Assessing Institutional Effectiveness**

***(Repeats 2006 Recommendation 2)***

To improve the efficacy of evaluation and planning to enhance institutional effectiveness, the team recommends that the college complete its work to fully implement its model for Program Review for all courses, programs and support services and advance its framework for defining and assessing Student Learning Outcomes for all courses, programs, support services and certificates and degrees, in order to develop and report performance metrics to measure institutional effectiveness, including information on noncredit students and specified indicators for the Annual Plan and the End-of-Year Assessment Report to the Board of Trustees (I.B.5 and ACCJC Rubric for Evaluation Institutional Effectiveness).

**Recommendation 4: Student Learning Outcomes**

***(Repeats 2006 Recommendation 3)***

To fully meet Standard II Student Learning Programs and Services, the team recommends that the college identify the intended student learning outcomes at the course, program, general education, certificate and degree levels, develop and implement assessments of student learning, and analyze the results of assessment to improve student learning. The results of ongoing assessment of student learning outcomes should foster robust dialogue and yield continuous improvement of courses, programs and services and the alignment of college practices for continuous improvement (I.B; II.A.1.a, c, II.A.2.a-c, f, g-i, II.A.3, II.A.6, II.A.6.a, II.B.1, II.B.3, II.B.4, II.C.2; III.A.1.c; IV.A.2.b, IV.B.2.b).

**Recommendation 5: Student Support Services**

***(Repeats part of 2006 Recommendation 3)***

To fully meet Standard II.B Student Support Services, the team recommends that the institution systematically assess student support services using student learning outcomes and other appropriate measures to improve the effectiveness of its support services and develop as well as communicate its plans for the expansion of delivery and prioritization of student services that support student learning and achievement regardless of location or means of delivery (II.B.1, II.B.3, II.B.3.a,c,d,e,f and II.B.4).

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**Recommendation 6: Human Resources Components of Evaluation**

To fully meet Standard III.A Human Resources, the team recommends that the evaluation of faculty and others directly responsible for student progress toward achieving stated student learning outcomes include a component that assesses the effectiveness in bringing about those learning outcomes (III.A.1.c).

**Recommendation 7: Human Resources**

*(Repeats part of 2006 Recommendation 2)*

To fully meet Standard III.A Human Resources, the team recommends that the college assess the adequacy of its current number of qualified classified staff and administrators and their appropriate preparation and experience necessary to support the institution's mission and purpose. The college must ensure that human resource planning is fully integrated with the institutional program review, planning and budgeting processes and linked to the annual allocations of funding to maintain and improve institutional effectiveness (III.A.2, III.A.6, and I.B.4).

**Recommendation 8: Physical Resources**

*(Repeats part of 2006 Recommendations 5 and 6)*

To fully meet Standard III.B Physical Resources, the team recommends that the college incorporate all costs required to appropriately operate and maintain existing facilities, whether owned or leased, into its annual and long-term planning and budgeting processes and annually allocate the required human and fiscal resources to effectively and equitably operate and maintain physical resources at locations where courses, programs and services are offered (III.B.1).

**Recommendation 9: Technology Resources**

*(Repeats 2006 Recommendation 7)*

To fully meet Standard III.C Technology Resources, the team recommends the college develop a comprehensive plan for equipment maintenance, upgrade and replacement that is integrated with the institution's budget allocation processes; and that the college continues to monitor its information technology systems and implement measures to more fully secure the technology infrastructure (III.C.1.a, c-d, III.C.2).

**Recommendation 10: Financial Planning and Stability**

*(Repeats 2006 Recommendation 4)*

To meet the Standard III.D Financial Resources, the team recommends that the college use its mission statement to inform its allocation of resources decisions to match annual, ongoing expenditures with ongoing financial resources. This action is needed to increase its reserves to a prudent level that will allow it to meet financial emergencies and unforeseen occurrences, to meet its operating expenses without excessive short-term borrowing, and to effectively manage the financial impact of its unfunded, long-term liabilities (III.D.1.c, III.D.2.c).

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**Recommendation 11: Financial Integrity and Reporting**

*(Repeats part of 2006 Recommendation 5)*

To meet Standard III.D Financial Resources, the team recommends the college use the resources necessary to provide accurate and timely reporting of financial information; and to report this information to internal users so they may effectively participate in the annual and long-term planning and budgeting processes (III.D.1.d, III.D.2.g).

**Recommendation 12: Leadership, Governance and Decision-making**

To fully meet Standard IV Leadership and Governance, the team recommends that the district engage the services of an external organization to provide a series of workshops for all college constituencies, including the members of the governing board, the chancellor, faculty, staff, students and every administrator, in order to clarify and understand their defined roles of responsibility and delineated authority in institutional governance and decision making (IV.A, IV.B).

**Recommendation 13: Governance Structures**

To fully meet Standard IV.A Decision-making Roles and Processes, the team recommends that college leaders from all constituencies evaluate and improve the college's governance structure and consequent processes used to inform decision making for the improvement of programs, practices and services. The college must ensure that the (decision making) process does not create undue barriers to the implementation of institutional decisions, plans and initiatives (IV.A.1, IV.A.3).

**Recommendation 14: Effective Board Organization**

*(Repeats part of 2006 Recommendation 8)*

To fully meet Standard IV.B Board and Administrative Organization, the team recommends that the board act in a manner consistent with its policies and by-laws, assess and develop operating procedures, develop and implement a plan for board development, and regularly evaluate the effectiveness of its policies and practices (IV.B.1.a, e-h).

The Evaluation Report that was sent to the institution provides details of the team's findings with regard to each Eligibility Requirement and Accreditation Standard and should be read carefully and used to understand the team's findings. The recommendations contained in the Evaluation Report represent the best advice of the peer evaluation team at the time of the visit, but may not describe all that is necessary to come into compliance. Institutions are expected to take all action necessary to comply with Eligibility Requirements, Accreditation Standards and Commission policies. The Commission wishes to remind you that while an institution may concur or disagree with any part of the report, City College of San Francisco is expected to use the Evaluation Report to improve educational programs and services and to resolve issues identified by the Commission.

Dr. Pamila Fisher  
City College of San Francisco  
July 2, 2012

A **final** copy of the Evaluation Report is enclosed. Additional copies may now be duplicated. The Commission requires that the Evaluation Report and this action letter be disseminated to College staff and to those who were signatories of the institutional Self Study Report. This group should include campus leadership and the Board of Trustees. The Commission also requires that the Self Study Report, Evaluation Report, and Commission action letter be made available to students and the public. Placing a copy on the College website can accomplish this.

Please call this office if the ACCJC staff can be of assistance or if you have any questions.

Federal regulations require the Commission to post a Public Disclosure Notice (PDN) for institutions placed on Probation or Show Cause, or when accreditation is terminated. The PDN is used to inform the public of the reasons for such a severe sanction. The Commission will post the PDN on the College's entry in the Directory of Accredited Institutions online at [www.accjc.org](http://www.accjc.org). The institution is permitted to post a response to the PDN. Enclosed find the proposed notice for City College of San Francisco with this action letter, and your comments on it are invited. Please provide the College's response for posting, if any, by July 31, 2012.

On behalf of the Commission, I wish to express continuing interest in the institution's educational programs and services. Professional self-regulation is the most effective means of assuring integrity, effectiveness and quality.

Sincerely,



Barbara A. Beno, Ph.D.

BAB/tl

Enclosure

cc: Mr. Larry Klein, Accreditation Liaison Officer  
Board President, Board of Trustees, San Francisco Community College District  
Ms. Sandra Serrano, Chancellor, Kern Community College District, Team Chair  
Ms. Martina Fernandez-Rosario, U.S.D.E.

<sup>1</sup> Institutions preparing and submitting Midterm Reports, Follow-Up Reports, and Special Reports to the Commission should review *Guidelines for the Preparation of Reports to the Commission*. It contains the background, requirements, and format for each type of report and presents sample cover pages and certification pages. It is available on the ACCJC website under College Reports to ACCJC at: (<http://www.accjc.org/college-reports-accjc>). An institution preparing a Show Cause Report is required to follow guidelines for institutional self study in addressing each of the Accreditation Standards cited by the Commission as areas of institutional deficiency.