2. Closure Report

The College is required to prepare a Closure Report in conjunction with the Show Cause Report in the event that ACCJC does not find cause to continue CCSF’s accreditation. The Chancellor and the Board of Trustees are responsible for developing the Closure Report.

The ACCJC’s policy on closing an institution appears on page 33 of the *Accreditation Reference Handbook*, accessible at the following link:

CLOSURE REPORT

City College of San Francisco
50 Phelan Avenue
San Francisco, California 94112

Submitted to

The Accrediting Commission for Community and Junior Colleges
Western Association of Schools and Colleges

March 15, 2013
DATE: March 15, 2013

TO: Accrediting commission for Community and Junior Colleges, Western Association of Schools and Colleges

FROM: City College of San Francisco
50 Phelan Avenue
San Francisco, California 94112

This Accreditation School Closure Report is submitted to accompany the Show Cause Report for City College of San Francisco for the purpose of assisting in the determination of accreditation status.

We certify that there was broad participation by representatives of the campus community and we believe the plan for closure accurately reflects the nature and substance of the institution.

Signed:

Dr. Thelma Scott-Skillman, Interim Chancellor

John Rizzo, President, Board of Trustees

Dr. Robert Agrella, Special Trustee

Karen Saginor, President, Academic Senate

James Rogers, President, Classified Senate

William Walker, Student Trustee

Gohar Momjian, Accreditation Liaison Officer
Background and Preparation for Closure

In a letter dated July 2, 2012, the ACCJC placed City College of San Francisco (CCSF) on Show Cause. As a result of this sanction, the College was required to:

1. Develop and submit a Special Report – due October 15, 2012 (the overall plan describes how CCSF will address the Mission, institutional assessments, planning and budgeting issues identified in several of the 2012 evaluation team recommendations)
3. Prepare for a team to conduct a comprehensive accreditation site visit of Commission representatives

The Commission issues Show Cause when it 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 condition imposed by the Commission.

“CCSF failed to demonstrate that it meets the requirements outlined in a significant number of Eligibility Requirements and Accreditation Standards. It also failed to implement the eight recommendations of the 2006 evaluation team (five partially addressed, and three completely unaddressed). The college is ... expected to fully address all of the recommendations of a comprehensive evaluation team before the next comprehensive evaluation visit occurs.”

The Commission has required CCSF to Show Cause as to why its accreditation should not be withdrawn. CCSF must demonstrate, through evidence, that it has corrected the deficiencies noted by the Commission and complies 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. During the Show Cause period, the institution must make preparations for closure according to the Commission’s Policy on Closing an Institution and submit this Closure Report with its Show Cause Report.

The District will only implement the steps associated with closure should the ACCJC determine such steps are necessary. The Commission will present its findings and determination as to the status of CCSF’s accreditation in a July 2013 correspondence to CCSF. That determination will be based upon the CCSF Accreditation Show Cause Report (submittal date to AACJC is March 15, 2013); the Spring (March-April) 2013 site visit; the October 15, 2012 Special Report; and other pertinent information and data.

---

1 July 2, 2012 AACJC letter to Dr. Pam Fisher, CCSF Interim Chancellor
Sanction History

Date: March 2006

Accreditation Status: Accreditation reaffirmed

Definition of Status: 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 which, if not addressed immediately may threaten the ability of the institution to continue to meet the Eligibility Requirements, Accreditation Standards and Commission policies. Additional reports required: Progress Report was filed on March 15, 2007; Focused Mid-Term Report was filed on March 15, 2009.


Date: March 2012

Accreditation Status: Show Cause

Definition of Status: Institution is in substantial non-compliance with its eligibility requirements, accreditation standards, or commission policies or the institution has not responded to the conditions imposed by the Commission.


According to the Commission,

"the accredited status of CCSF 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. Since the loss of accreditation would likely cause CCSF to close, during the show cause period, CCSF must make preparations for closure according to the Commission’s Policy on Closing an Institution."2

The loss of accreditation would likely result in a loss of state and federal funds, including all general fund and categorical apportionment revenues, financial aid, and maintenance and operations funds. The magnitude of this loss would cause all functions of the College to cease. Although the District technically could remain as a legal entity, removal of funding could have the same effect as closing the institution. CCSF is developing and implementing every step and precaution to address all ACCJC recommendations so that the institution can demonstrate why its accreditation should be continued. Tremendous progress is being made. However, given the magnitude of the deficiencies, not all deficiencies will be resolved by the

---

2 July 2, 2012 AACJC letter to Dr. Pam Fisher, CCSF Interim Chancellor
March 15, 2013 submittal date of the report, nor by the subsequent team visit in Spring 2013. Due to the parallel requirement to address the Commission’s policy on closing an institution, the College is taking this Closure Report seriously and will submit it to ACCJC by March 15, 2013.

CCSF is following ACCJC’s Policy on Closing an Institution to develop a closure plan to ensure students’ interests are protected. Therefore, the challenge is to develop a closure plan that would provide services to students and the community with the least disruption while CCSF corrects deficiencies as noted in the July 2, 2012 letter.

The ACCJC Policy on Closing an Institution stipulates that:

“Before closing, the governing board should consider carefully such alternatives as merging with another institution, forming a consortium, or participating in extensive institutional sharing and cooperation.”

It is imperative that CCSF work diligently to ensure that it protects the interests of the students.

In the event the Closure Plan needs to be active by the beginning of Fall 2013, CCSF would, in advance and using a consultative process, implement the following:

<table>
<thead>
<tr>
<th>DEFINED TASK</th>
<th>RESPONSIBILITY ENTITY</th>
<th>TIME FRAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>Engagement of each identified constituent group in consultation and closure planning</td>
<td>Special Trustee, Board of Trustees, CEO, Administration and Participatory Governance Council</td>
<td>By 01/24/2013</td>
</tr>
<tr>
<td>A review of State and/or National Law Relative to Legal Responsibilities: Employee entitlements</td>
<td>Special Trustee, Board of Trustees, CEO, and Administration, Unions</td>
<td>By 06/30/2013</td>
</tr>
<tr>
<td>A review of State and/or National Law Relative to Legal Responsibilities: Title to Real Property/Other Legal Responsibilities</td>
<td>Special Trustee, Board of Trustees, CEO, and Administration</td>
<td>By 09/30/2013</td>
</tr>
<tr>
<td>Alternatives to Closing (Merging, Forming Consortiums, Inter-Institutional Sharing/Corporation)</td>
<td>Special Trustee, Board of Trustees, CEO, Administration and Participatory Governance Council</td>
<td>By 06/30/2013</td>
</tr>
<tr>
<td>Instructional Services Agreement (ISA) with an accredited college to offer contracted instructional services. (A substantive change proposal would need to be approved by AACJC for this to be a viable option.)</td>
<td>Special Trustee, CEO, Board of Trustees, Administration, Academic Senate</td>
<td>By 06/30/2013</td>
</tr>
<tr>
<td>Governing Board fully informs all affected constituents</td>
<td>Board of Trustees, CEO, Administration</td>
<td>By 08/31/2013</td>
</tr>
<tr>
<td>Provisions for Student Completion of Programs and the securing of student records</td>
<td>Board of Trustees, CEO, Administration</td>
<td>By 10/31/2013</td>
</tr>
</tbody>
</table>

3 ACCJC Policy on Closing an Institution (June 2012)
In adherence to the ACCJC’s requirements identified in its Policy on Closing an Institution, the following is a list of the activities that the CCSF needs to fully address to ensure that transition for students is smooth. A complete analysis/address of the following elements will be accomplished:

<table>
<thead>
<tr>
<th>DEFINED TASKS</th>
<th>TIME FRAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>A  Student Completion</td>
<td>By 12/31/2013</td>
</tr>
<tr>
<td>B  Disposition of Academic Records and Financial Aid Transcripts</td>
<td>By 12/31/2013</td>
</tr>
<tr>
<td>C  Provisions for Faculty and Staff – Adhere to Appropriate Code Sections</td>
<td>By 03/15/2014</td>
</tr>
<tr>
<td>D  Disposition of Assets</td>
<td>By 12/31/2013</td>
</tr>
<tr>
<td>E  Obligation of Assets</td>
<td>By 12/31/2013</td>
</tr>
<tr>
<td>F  Coordination with the ACCJC</td>
<td>Ongoing</td>
</tr>
<tr>
<td>G  Key Governing Board Obligations</td>
<td>By 06/30/2013</td>
</tr>
</tbody>
</table>
A. Student Completion

Closure requires provisions for the academic needs of students who have not completed their degrees and educational programs.

- The College will make arrangements to permit those students who have completed 75 percent of an academic program at CCSF to complete the remainder of the program elsewhere. The student will be entitled to receive the degree and educational program from the “closed” institution (CCSF). Arrangements shall be made with the ACCJC for continuation of the College’s accreditation by the ACCJC for this purpose only.
- The College will notify neighboring districts with the goal to provide students the opportunity to complete courses at their colleges.
- Arrangements for transfers to other institutions will require complete academic records and all other related information gathered in dossiers that can be transmitted promptly to receiving institutions.
- The College will submit to the ACCJC for approval arrangements made with other institutions to receive transferring students and to accept records.
- The College will make arrangements with the appropriate federal or state grants agencies to transfer the grants to the receiving institutions. For student-held scholarships or grants or other available funds that can be legally used, the College will need to negotiate appropriate agreements or fully inform students.
- If accreditation is removed, the College will generate a list of students who have completed 75 percent of an academic degree/educational program/certificate program by the end of Spring 2013.
- The Vice Chancellor of Student Development will be responsible for notifying students who have completed 75 percent of an academic degree and educational program and/or certificate program of their potential graduation/completion status. The College will inform students of their status for a degree or certificate and their option to receive a degree or certificate under CCSF or other institutions if they are to complete the respective curriculum. After a loss of accreditation, CCSF student would have no other option except to transfer to another accredited institution.
- The College will issue a letter for each student indicating the closure of the College and to ensure the acceptance of the credits by other accredited institutions. If applicable, the Chancellor will send CCSF closure notifications to the neighboring colleges for them to accept the CCSF transfer students and their credits before any termination date.
- The College will contact the following neighboring districts: San Mateo CCD; Marin County CCD; Peralta CCD; Contra Costa CCD; San Jose-Evergreen CCD; Chabot-Las Positas CCD; Ohlone CCD.
- The District will provide every student with the most up-to-date transcript at the time of request as well as by mail, telephone hotlines, College website, and public and social media as to where they can retrieve a copy of their transcript.
Communication will be in English and all languages utilized by current CCSF students.

B. Disposition of Academic Records and Financial Aid Transcripts

All academic records, financial aid information, and other records must be prepared for permanent filing, including microfilming. Arrangements must be made ... to preserve the records. Notification must be sent to every current and past student indicating where the records are being stored and what the accessibility to those records will be. Where possible, a copy of a student’s record should also be forwarded to the individual student. The ACCJC must be notified of the location where student permanent records will be stored.

- Digitize and microfilm all student files. Student records have been electronic since 1984.
- All student records are filed (identify location and record dates such as 1977 – 2012).
- Digitize and store ALL financial aid records, human resources records, and business office records (identify location and record dates).
- Notify ACCJC and students of the location of stored records and accessibility once the process has been completed.
- Work with the State Chancellor’s Office to contract with an entity to electronically store all transcripts and provide the students with the process to order them.
- Announce the process and procedure on how students can obtain their transcripts through the news media in English and other languages commonly spoken by CCSF students.
- Make arrangements for the Admissions and Records Office to be open for pick-ups as campus closure is in effect.
- Establish a dedicated hotline and utilize other social media and the College website to provide students with instructions on how and where they can order transcripts. Continued maintenance of the website, social media and hotline will provide accurate and up-to-date information for all students.

C. Provisions for Faculty and Staff

The institution must arrange for continuation of those faculty and staff who will be necessary for the completion of the institution’s work up to and after the closing date.

- The District will work in good faith to assist faculty and staff in finding alternative employment.
- The District cannot make any guarantees to future employment beyond the closure of CCSF. The District will accept early resignations and/or retirements should faculty or staff members obtain new positions outside the District or choose to retire.
Following Commission action on the District’s Show Cause Report, all faculty and staff will receive written notification immediately about the Commission’s determination. In the event of closure, faculty will receive a notice as required by Ed Code and contract and classified employees will receive their layoff notices per contract.

The College will contact neighboring districts (San Mateo CCD; Marin County CCD; Peralta CCD; Contra Costa CCD; San Jose-Evergreen CCD; Chabot-Las Positas CCD; Ohlone CCD) regarding available employment opportunities in their district for information sharing with current CCSF employees.

The Human Resources Department would actively list job opportunities across the District and work with faculty and staff in alternate placement.

D. Disposition of Assets

Determinations must be made to allocate whatever financial resources and assets remain after the basic needs of current students, faculty, and staff are provided for.

The District will remain as the legal entity to monitor the disposition of its assets.

In the event the District does not have sufficient financial resources to honor obligations to creditors, the Board of Trustees will determine the necessary steps to proceed with possibility declaration of bankruptcy. Should such action be taken, the bankruptcy court judge will determine the disposition of assets.

In the event of closure, the College will terminate all long-term off-site (credit/noncredit instruction) existing contracts/MOU’s or Lease Agreement with month-to-month continuations in some locations based on summer course offerings.

The College will review and establish all lease agreement in collaboration with any potential merger district upon notification of closure.

The College will notify the U.S. Department of Education (USDE) upon closure with the submittal of financial reports and performance reports within 45 days. The District will notify the USDE how records will be retained and stored.

The College will develop procedures for collecting any outstanding student loans, reconcile any over-awards, overpayments, and/or withdrawal calculations.

The College will return all unexpended funds of all categorical programs to the respective agencies if these agencies require such action.

The District will work with the Foundation for CCSF to ensure that the assets would honor the intentions of the original providers including endowments, donors, and grantors.

The College will notify all donors and grantors of the College’s disposition of endowments and donations.

The District will adhere to State or federal laws regarding the disposition of funds and institutional assets.

The District will determine the value of real and personal properties.
The District will explore all viable options and confirm that employee long-term retiree benefits, vacation and compensation time obligations are satisfied.

The District will satisfy vendor obligations as required by federal and State regulations.

With the assistance of legal counsel, the District will also explore the sales of physical plan, equipment, library, special collections, art, or dispensation of other funds if necessary.

E. Obligations to Creditors

The institution must establish a clear understanding with its creditors and all other agencies involved with its activities to assure that their claims and interests will be properly processed ... All concerned federal, national and state agencies need to be apprised of the institution’s situation, and any obligations relating to estate or governmental funds need to be cleared with the appropriate agencies.

In the event of closure, the College would terminate all long-term off-site (credit/noncredit instruction) existing contracts/MOU’s or Lease Agreement with month-to-month continuations in some locations based on summer course offerings.

All lease agreements would be reviewed and established in collaboration with any potential merger district upon notification of closure.

The District will identify all outstanding creditor obligations for all funds, including local bond fund creditors.

The District will follow the State or federal laws regarding payments of creditors.

The District will apprise all agencies of the institution’s arrangements in order not to be subject to later legal proceedings.

The District will process properly all claims and interests with creditors and other agencies.

The District will develop publicly defensible policies for dividing the resources equitably among those with claims against the institution.

In the event the District does not have sufficient financial resources to honor obligations to creditors, the Board of Trustees will determine the necessary steps to proceed with possibility declaration of bankruptcy. Should such action be taken, the bankruptcy court judge will determine the disposition of assets.

F. Coordination with the ACCJC

The ACCJC and other specialized accrediting bodies must be consulted and kept fully apprised of developments as the plan to close an institution progresses. Arrangements must be completed with the ACCJC in advance of closure in order to assure that a legally authorized and accredited institution awards degrees. A final report on the closing must be submitted to the ACCJC for its records. The ACCJC must also be notified of the location where student records will be stored.
The Governing Board of CCSF will consult with and keep the ACCJC apprised of all matters pertaining to the closure of the College.

Consultation with AACJC will occur to assure that students have transferred to legally authorized and accredited institutions including any partnership institutions.

Student completion, including all records, will be provided for as detailed in section A of this document.

The College will disclose to the ACCJC the permanent storage location of all student records.

G. Key Governing Board Obligations

The governing board must take a formal vote to terminate the institution on a specified date. ... Also, the board must identify the person or persons authorized to determine whether or not these requirements have in fact been satisfied.

- The CCSF Board of Trustees will take a formal vote to terminate the College by ACCJC’s termination-of-accreditation decision and based on the progress of the closure activities.
- The Board of Trustees will ensure that the current students who are at 75 percent completion will be able to be graduated from CCSF by completing their requirements elsewhere or through any approved partnerships.
- The Board of Trustees will take legal action to set a deadline for completion of degrees and certifications, authorize the Chancellor to determine whether or not these requirements have in fact been satisfied; and make arrangements with ACCJC in advance regarding CCSF granting degrees.
- In the event of termination, CCSF will not be authorized to award accredited degrees nor enroll new students.
- The Board of Trustees will decide the date to file for bankruptcy if necessary and determine whether or not all obligations to students have been satisfactorily discharged.

H. Fruition

Should closure occur, students are to be provided appropriate and essential support services during and after the closure period.

- In the event of closure, during the final semester, CCSF will provide the students with appropriate and necessary services in academics, the business office, the financial aid office, the registrar’s office, counseling, and other essential support services.
- The District will notify management, faculty, and classified staff that personnel are to be retained.
- The District will make every effort to honor long-term financial obligations (loans, debentures, etc.)
- The District will continue to operate in its legal capacity regarding relevant personnel services, fiscal services, facilities services, and other related student services during and immediately following the closure period until such time as all legal obligations are met.

### Procedures Implemented to Develop Closure Report

<table>
<thead>
<tr>
<th>TASK</th>
<th>CEO and LEAD GROUPS</th>
<th>DUE DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review policy WASC policy on Closing an Institution.</td>
<td>CCSF CEO; Special Trustee</td>
<td>November 5, 2012</td>
</tr>
<tr>
<td>Review Show Cause Report, assessment of CCSF status (progress), and Closure Policy. Clarify role and responsibility of State Chancellor’s Office with the closure of CCSF.</td>
<td>CCSF CEO; Special Trustee; Executive Vice Chancellor-CCCCCO</td>
<td>December 19, 2012</td>
</tr>
<tr>
<td>Review Closure reports for: Diablo Valley College (DVC); Solano College (SC); College of the Redwoods (COR); Cuesta College (CC).</td>
<td>CCSF CEO; Special Trustee</td>
<td>December 23, 2012</td>
</tr>
<tr>
<td>Review Closure Policy and clarify role and responsibility of State Chancellor’s Office with the closure of CCSF.</td>
<td>CCSF CEO; Special Trustee; Executive Vice Chancellor-CCCCCO</td>
<td>January 8, 2013</td>
</tr>
<tr>
<td>Engage in dialogue with CEOs responsible for the above mentioned closure reports: Kathryn Lehner, CEO (COR); Gil Stork, CEO (CC); Bob Jensen, CEO (SC); Helen Benjamin, CEO (DVC).</td>
<td>CCSF CEO</td>
<td>January 15, 2013</td>
</tr>
<tr>
<td>Draft Closure Report – Framework. Review with Board president and vice president.</td>
<td>Board President &amp; Vice President</td>
<td>January 17, 2013</td>
</tr>
<tr>
<td>Discuss Closure Policy, timeline, and, process with constituent leadership.</td>
<td>CCSF CEO; Special Trustee; PGC</td>
<td>January 17, 2013</td>
</tr>
<tr>
<td>1st Reading Draft Closure Report (and Show Cause Report).</td>
<td>Board of Trustees</td>
<td>January 24, 2013</td>
</tr>
<tr>
<td>Obtain feedback on draft Closure Report (and Show Cause Report).</td>
<td>Open for CCSF community to submit feedback</td>
<td>January 24 - February 28, 2013</td>
</tr>
<tr>
<td>Submit draft Closure Report to State Chancellor’s Office.</td>
<td>CCSF CEO</td>
<td>February 8, 2013</td>
</tr>
<tr>
<td>Discuss Draft Closure Report.</td>
<td>CCSF CEO; PGC</td>
<td>February 17, 2013</td>
</tr>
</tbody>
</table>

*Developed by: Thelma Scott-Skillman, Interim Chancellor (November 5, 2012)*