

Laney College

Special Report in Response to January 27, 2020 Action Letter from the Accrediting
Commission of Community and Junior Colleges



Submitted by:

Laney College

900 Fallon Street

OAKLAND, CA 94607

Submitted to:

Accrediting Commission for Community and Junior Colleges,

Western Association of Schools and Colleges

November 1, 2020

TABLE OF CONTENTS

Certification Page.....	4
Report Preparation.....	5
Response to the January 27, 2020 Commission Letter	
<i>Foreword: Background and Structure of the Laney College Special Report.....</i>	<i>6</i>
Part One: College Response	9
• Establishing FTES and Enrollment Management Plans	
• Establishing a Student Success Infrastructure Plan to comply with the Student-Centered Funding Formula as announced by the California Community Colleges Chancellor’s Office	
• Establishing guidelines to reduce operation overspending and eliminate the structural deficit	
• Adopting a board policy to adopt sustainable fund balances and reserves	
• Adopting a restructuring plan to improve efficiencies and accountability at the District office and the Colleges	
• Addressing all audit findings	
• Establishing strategies to improve the management of the OPEB debt	
• Providing an executive-level staff turnover analysis and recommendations to retain these staff at the District	
List of Evidence for Part One	35
Part Two: District Response	37
• <i>Addressing structural deficit</i>	
• <i>Adherence to Board policies and administrative procedures</i>	
• <i>Addressing reconciliation and financial control issues</i>	
• <i>Addressing key staffing issues</i>	
• <i>Addressing OPEB obligations</i>	
• <i>Addressing ongoing unaddressed audit findings</i>	
List of Evidence for Part Two	49

Tables

Summary of College/District Actions and Deficiency Areas	<i>Preface</i>
Table 1: 2020-21 District and College Enrollment Targets	Page 11
Table 2: Laney College Enrollment Goals	Page 15
Table 3: Enrollment Data for Online/Hybrid Offerings	Page 20
Table 4: Laney College Dual Enrollment Allocations and Apportionment, Including Goals through 2023-24.	Page 22
Table 5: 2018-19, 2019-20 Financial Aid Data	Page 24
Table 6: Financial Aid Data, Goals through 2023-24	Page 26
Table 7: Success Rate Data, Goals for Transfer Math, English through 2023-24	Page 27
Table 8: Data on Awards, Including Goals through 2023-24	Page 29
Table 9: Vacant Positions at Laney College in Fall 2020	Page 34
Table 10: Summary of 2020-2021 fees for OPEB Bond Program	Page 45
Table 11: Present v. past practices relative to District Finance Plan	Page 48
Table 12: District Preliminary Audit Findings (as of 10/29/2020)	Page 49

Figures

Figure 1: Enrollment Summary Report for Laney College for 2018-19, 2019-20, 20-2021 taken from Power Business Intelligence Platform on October 2, 2020	Page 13
Figure 2: District-wide Enrollment for 2019-20 Summer, Fall, and Spring semesters, as shown by Power Business Intelligence Platform on October 15, 2020.	Page 14
Figure 3: Laney College Instruction Office Sample Scheduling Matrix	Page 17
Figures 4, 5: Block Schedules for Laney College, with College hours	Page 19
Figure 6: Screenshot of all Laney College English 1A Offerings in Peralta Online Scheduling Tool (POST).	Page 20

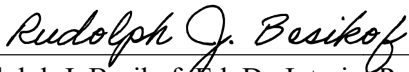
Certification Page

To: Accrediting Commission for Community and Junior Colleges,

From: Rudolph Joseph Besikof, Ed.D.
President (Interim)
Laney College
900 Fallon Street
Oakland, CA 94607

We certify there was broad participation/review by the campus community and believe this report accurately reflects the nature and substance of this institution.

Signatures:



Rudolph J. Besikof, Ed. D., Interim President, Laney College 10/22/2020
Date


Carla Walter (Oct 29, 2020 08:29 EDT)


Carla Walter, Ph. D., Interim Chancellor, Peralta Community College District 10/29/2020
Date


Julina Bonilla (Oct 29, 2020 17:48)


Julina Bonilla, President, Peralta Community College Board of Trustees 10/29/2020
Date


alfredkonuwa (Oct 22, 2020 13:43 PDT)

Alfred Konuwa, Ph. D., Accreditation Liaison Officer, Laney College 10/22/2020
Date


Eleni Gastis (Oct 27, 2020 15:46 PDT)

Eleni Gastis, Professor, Faculty Senate President, Laney College 10/27/2020
Date



Alejandro Acosta, Classified Senate President, Laney College 10/27/2020
Date

REPORT PREPARATION

This Special Report is written in response to the concerns raised by the Commission and is informed by discussions that have taken place over the past several months in Chancellor's Executive Cabinet Meetings, and the College's Executive Council and Management Council Meetings, as well as updates given during meetings of College Council, Faculty Senate and Classified Senate. While the membership of the Academic Senate and Classified Senate have had the opportunity to provide feedback, the Laney College Executive Administrative Team was primarily responsible for authoring the Special Report. This group comprises the following individuals:

Special Report Team Members	Title or Position
Dr. Rudy J. Besikof	President
Dr. Alfred Konuwa	Accreditation Liaison Officer, (Acting) Dean of Math & Sciences
Dr. Derek Pinto	Vice President of Administrative Services
Professor Eleni Gastis	Faculty Senate President
Professor Christopher Weidenbach	Faculty Accreditation Coordinator
Dr. Leslie Blackie	Faculty Senate Vice President
Vicki Ferguson	Vice President of Student Services
Dr. Mark Fields	Vice President of Instruction (Acting)
Kevin Q Tran	Principal Financial Analyst
Ronnie Lewis	Director of Financial Aid
Clifton Coleman	Campus Research Analyst
Karen Tellegen	Staff Assistant, Dean of Social Sciences/Humanities

The role of the PCCD District Office staff in preparing this Special Report must be acknowledged as well. The District Appendix speaks to their critical contributions.

Finally, drafts of the Special Report was reviewed by members of the PCCD Board of Trustees on October 13, and October 27, at its regularly scheduled meetings.

Response to the Commission Letter

Background

The January 27th letter from the Accrediting Commission for Community and Junior Colleges (ACCJC or Commission) found that the College/District's Special Report and Fiscal Plan provided insufficient information to verify the degree to which deficiencies have been resolved, addressed, or corrected, and placed the College on Probation Status.

Structure of the Laney College Special Report

This response is organized into two parts: the *Laney College Response* and the *Peralta Community College District Response*. Content in each of the parts is as follows:

(a) Part One: Laney College Response to January 27, 2020 ACCJC Action Letter

This portion of the Special Report has been crafted to specifically respond to the following ACCJC comments in the January 27, 2020 letter. These points led to the College being placed on Probation:

- *In several areas of the (June 2019) special report, the College/District has responded with corrective intent, but no evidence was provided that corrective actions are being implemented to address the noted deficiencies.*
- *The special report lacks the organizational structure, clarity and specificity of content.*

It is the College's intent therefore to demonstrate that the following eight points of the June 2019 report now clearly show corrective actions, and that this report contains appropriate organizational structure, clarity and specificity. As such, Part One is structured according to the June 2019 Special Report's original 8 points:

- Establishing FTES (Full Time Equivalent Students) Targets and Enrollment Management Plans
- Establishing a Student Success Infrastructure Plan to comply with the Student-Centered Funding Formula as announced by the California Community College Chancellor's Office
- Establishing guidelines to reduce operational overspending and eliminate the structural deficit
- Adopting a Board policy to reflect sustainable fund balances and reserves
- Adopting a restructuring plan to improve efficiencies and accountability at the District office and the Colleges
- Addressing all audit findings
- Establishing strategies to improve the management of the OPEB debt
- Providing an executive-level staff turnover analysis and recommendations to retain these staff at the District

A summary of the points detailed in Part One is found in the table below:

Topics of Concern	College Actions	Deficiency Item Addressed
Establishing FTES (Full Time Equivalent Students) Targets and Enrollment Management Plans	<ul style="list-style-type: none"> • Approval and Implementation of Comprehensive Enrollment Management Plan • Continuing Implementation of Pathway-Based Schedule Building • Projection-based scheduling rather than roll-over • Review/restoration of programs with declining enrollments • Consistent lecture start, end times • Promotion of late-starting courses (e.g. 2nd half of term) • Responding to online demand • Supporting students through increased online tutoring, counseling • Expanding Dual Enrollment 	Structural Deficit
Establishing a Student Success Infrastructure Plan to comply with the Student-Centered Funding Formula as announced by the California Community College Chancellor's Office	<ul style="list-style-type: none"> • Enrollment growth strategies mentioned in Establishing FTES/Enrollment Management Plans • Financial Aid Strategies to increase potential Supplemental Allocation • Maximize Student Success Allocation: <ul style="list-style-type: none"> ✓ Continued support of transfer English, math success rates with further implementation of AB705 ✓ Allow lower-enrolled capstone courses to run ✓ Implement degree, certificate auto-award (with notification to students) 	Structural Deficit
Establishing guidelines to reduce operational overspending and eliminate the structural deficit	<ul style="list-style-type: none"> • Provide additional fiscal management training at the College • Align budget development with standard operating procedures • Refine standard operating procedures to align with District policies, procedures • Share Budget Development process, dates with cost center managers, participatory governance stakeholders • Manage instructional allocations to ensure scheduling, services are within means 	Structural Deficit
Adopting a Board policy to adopt sustainable fund balances and reserves	Part Two of the Special Report Provides details regarding BP/AP 6450	Adherence to board policies and administrative procedures
Adopting a restructuring plan to improve efficiencies and accountability at the District office and the Colleges	<ul style="list-style-type: none"> • Hiring of Director of Facilities • Hiring of Vice President of Administrative Services • Filling acting, interim positions with permanent hires 	<ul style="list-style-type: none"> • Reconciliation and Financial Control Issues • Key Staffing Issues
Addressing all audit findings	Addressed the only College audit finding	Ongoing unaddressed
Establishing strategies to improve the management of the OPEB debt	Part Two of the Special Report provides details regarding District's addressing of OPEB debt	OPEB obligations
Providing an executive-level staff turnover analysis and recommendations to retain these staff at the District	Professional Development, Dialog in areas of Equity, Diversity and Inclusion for Campus Executive Leadership as well as College management team.	Executive turnover

Preface Table 1: Summary of College/District Actions and Deficiency Areas Addressed by Topic of Concern

(b) Part Two: Peralta Community College District Response to January 27, 2020 ACCJC Action Letter

This second portion of the Special Report addresses the remaining concerns of the January 27, 2020 Action Letter from ACCJC. Within it, six deficiencies identify more specific issues related to the District as a whole, and as such, this portion of the response is structured so that a direct response and relevant evidence may be provided for each issue.

The narrative and deficiencies from the ACCJC Action Letter are as follows:

“It is not evident from the special report that the College/District has addressed foundational issues which have bearing on its fiscal health; this includes:

- *a continued structural deficit*
- *lack of adherence to Board policies and administrative procedures*
- *deficiency in reconciliation and financial control issues*
- *key staffing issues*
- *its OPEB obligations*
- *ongoing unaddressed audit findings*

Although Part Two has been organized to address the above concerns, the content will also meet the requirements of having satisfactory levels of clarity, specificity and structure; additionally, Part Two provides tangible evidence of corrective actions.

At the end of both Parts One and Two, there is a linked list of evidence cited in the Special Report, and all evidence will be provided to the Commission on the flash drive that accompanies this report.

Part One: Laney College Response



Structure of Part One

This portion of the Special Report will provide College and District-level responses organized by the eight integrated fiscal plan areas noted by the Commission in its January 27, 2020 letter, which are as follows:

- 1) *Establishing FTES Targets and Enrollment Management Plans*
- 2) *Establishing a Student Success Infrastructure Plan to comply with the Student-Centered Funding Formula as announced by the California Community College Chancellor's Office*
- 3) *Establishing guidelines to reduce operational overspending and eliminate the structural deficit*
- 4) *Adopting a Board policy to reflect sustainable fund balances and reserves*
- 5) *Adopting a restructuring plan to improve efficiencies and accountability at the District office and the Colleges*
- 6) *Addressing all audit findings – Financial Aid, DSPS (Disabled Students Programs & Services), Athletics, Cashier, Internal Audits*
- 7) *Establishing strategies to improve the management of the OPEB debt*
- 8) *Providing an executive-level staff turnover analysis and recommendations to retain these staff at the District.*

1) Establishing FTES and Enrollment Management Plans

Establishment of FTES Targets by District

For the past five years, the Peralta Community College District (PCCD or District) has published FTES targets and FTEF allocations based on the California Community Colleges Chancellor’s Office Budget and Accounting Manual (1-01) guidelines.

The funding allocation uses three-year FTES averages while the FTES targets use a productivity rate of 17.5 (ratio of the number of weekly student contact hours (WSCH) generated by the full-time equivalent faculty) to maximize efficiency (see table below of 2020-21 Districtwide targets). The 17.5 ratio compares to the California Community College Chancellor’s Office calculation of efficiency as it relates to generation of FTES (1 FTES = 525 student contact hours).

ANNUAL DISTRICT TARGETS	
2020-21 RES FTES Target	16,000
BAM 3 yr ave - NON-RES FTES	1,507
2019-20 TOT FTES Target	17,507
Productivity Target	17.5

ANNUAL COLLEGE ALLOCATIONS	Alameda	BCC	Laney	Merritt	Total
BAM 3 yr ave - RES FTES	3,133	3,389	6,286	3,882	16,690
BAM 3 yr ave - RES FTES %	18.8%	20.3%	37.7%	23.3%	100%
Annual 2020-21 RES FTES allocation	3,003	3,249	6,026	3,722	16,000
BAM 3 yr ave - NON-RES FTES	233	491	556	230	1,507
TOTAL FTES	3,236	3,740	6,582	3,952	17,507
TOT FTES %	18.49%	21.36%	37.59%	22.57%	100%
Annual 2020-21 TOT FTES allocation	3,236	3,740	6,582	3,952	17,510
2020-21 FTEF allocation based on TOT FTES Allocation and Total Productivity Target	184.9	213.7	376.1	225.8	1,000.6
High Productivity FTEF Set Aside	6.80	7.30	13.50	8.40	36.0
Dual Enrollment FTEF					26
Allocations by Semester	Alameda	BCC	Laney	Merritt	Total
Summer 2020 (10% of annual)					
RES FTES	300.3	324.9	602.6	372.2	1,600.0
TOT FTES	323.6	374.0	658.2	395.2	1,751.0
FTEF	18.5	21.4	37.6	22.6	100.1
Fall, Spring, 2020-21 (45% of annual each)					
RES FTES	1,351.4	1,461.9	2,711.8	1,674.8	7,200.0
TOT FTES	1,456.4	1,683.0	2,961.8	1,778.5	7,879.7
FTEF	83.2	96.2	169.2	101.6	450.3
Annual 2020-21					
RES FTES	3,003.2	3,248.7	6,026.1	3,721.8	15,999.9
TOT FTES	3,236.5	3,740.0	6,581.8	3,952.2	17,510.5
FTEF	184.9	213.7	376.1	225.8	1,000.6

Table 1: 2020-21 District and College Enrollment Targets

The College has experienced declining enrollments during the past 5 years, and in Fall 2018 it began to address the issues leading to declining numbers by drafting enrollment management

goals toward creation of both an Enrollment Management Committee and an enrollment management plan that includes goals, objectives and activities to serve students and address falling numbers. What follows is a detailed account of the key points of that committee's work and the resulting plan.

2019-21 Laney College Strategic Enrollment Management Plan

The College has engaged in campus-wide and institutional activities rooted in its 2019-2021 Strategic Enrollment Management Plan (SEM Plan) (1-02) to address the enrollment and enrollment management-related concerns noted by the Commission. Specifically, the College has taken specific actions to establish a sound model for both FTES generation and related enrollment management practices and evidence that result from the plan. The Plan's original Spring 2019 goals (1-03) were in the areas of Scheduling, Curriculum, and Program Pathways (9 goals); Support and Services (8 goals); and Marketing and Outreach (12 and 7 goals, respectively).


Follow-up SEM Plan Goals - By the time the June 2019 Integrated Fiscal Plan was filed with the Commission, the College had just ended its first year of having a sustainable Strategic Enrollment Management Committee and had recently approved its SEM Plan (1-04), including the aforementioned goals. However, as the College treated the findings of the June 2019 release of the Collaborative Brain Trust (CBT) (1-05) and Fiscal Crisis & Management Assistance Team (FCMAT) (1-06) reports with utmost seriousness, it immediately amended the plan to include the following goals, all of which were reflective of the reports' findings, and the updated plan was approved by College Council in Fall 2019:

- *Modify scheduling to increase productivity toward FTES/FTEF number of 17.5*
- *Engage in more cooperative scheduling practices in relation to the offerings of the other Peralta Colleges – This included shifting the “College Hour” and expanding it to five days per week.*
- *Incorporate Student-Centered Funding Formula considerations into curricular approvals as well as schedule analysis and planning.*

The Fall 2019 Additional Goals to the SEM Plan (1-07) contains the above added goals, with additional details that include related projects and tasks, as well as expected dates of completion.

As the state and nation continue to experience community college enrollment declines, the College is following its SEM Plan (1-08) to reverse the trend, as demonstrated in the Plan's goals. This has been especially challenging because among the four Peralta Colleges, Laney's list of available degrees and certificates (1-09) includes a high number of low class-cap, workforce-related programs (mostly in Career Education) that have classrooms or lab areas with limited numbers of learning stations. Pages 6-8 of a Summer/Fall 2019 Enrollment Management Compendium (1-10) written in Summer 2019 has data that demonstrates this, not only as it relates to course caps but also classroom caps. For instance, it found that nearly 4 in 10 classrooms (38%) have room capacities under 35, which means they cannot hold enough students to produce a 17.5 productivity (FTES/FTEF) number.

Despite such limitations, Laney College has made progress with regard to efficiency in scheduling, notwithstanding Fall 2020. Its FTES/FTEF (productivity) for the 2019-20 year saw an overall increase from 2018-19, when changes informed by the SEM Plan took effect. As demonstrated below, productivity across the College increased by .5, from 14.09 to 14.59, or the rough average equivalent of one student per class.



Enrollment Summary Report

Academic Year	Sections	Census	FTES RESD	FTES_NONR	FTES_TOTL	FTEF_CONT	FTEF_EXSV	FTEF_TEMP	FTEF_TOTL	Productivity
Year 20-21	1613	23,704	2,621.83	229.68	2,851.52	84.47	30.44	99.94	214.85	13.27
Laney	1613	23,704	2,621.83	229.68	2,851.52	84.47	30.44	99.94	214.85	13.27
Year 19-20	1753	50,459	6,035.02	508.55	6,543.57	165.65	60.50	222.45	448.60	14.59
Laney	1753	50,459	6,035.02	508.55	6,543.57	165.65	60.50	222.45	448.60	14.59
Year 18-19	1887	51,872	6,171.51	528.54	6,700.05	174.11	57.29	243.98	475.38	14.09
Laney	1887	51,872	6,171.51	528.54	6,700.05	174.11	57.29	243.98	475.38	14.09

Figure 1: Enrollment Summary Report for Laney College for 2018-19, 2019-20, 20-2021 taken from Power Business Intelligence Platform on October 2, 2020 (Note: As this Special Report was filed during Fall Semester, 2020, data on 2020-21 only reflects full-term Fall courses.). Data taken from Power Business Intelligence Platform on October 2, 2020.

Prior to the pandemic, the College had made demonstrated progress resulting from the shift in scheduling practices that began in Fall 2018, i.e. projection-based scheduling, which is identified as a practice in the College’s SEM Plan. Examples of improved outcomes include the following:

- (1) The College reached its Summer 2019 enrollment target.
- (2) The College came within less than 1.5% of its enrollment target in Fall 2019, second closest among the four Peralta Colleges.
- (3) In Spring 2020, as indicated below from Power Business Intelligence Enrollment data ([1-11](#)), the College’s FTES/FTEF number was the highest in the District, and its enrollment was the closest to the target of the four Colleges.

These milestones are significant because prior to implementation of the SEM Plan and projection-based scheduling, the College typically finished each semester well below its enrollment target and 4th of the four Colleges in FTES/FTEF, as indicated in Figure 2.

Term		Alameda	Berkeley	Laney	Merritt	PCCD
Summer 2019	Resident FTES Target	326.90	358.70	623.90	390.50	1,700.00
	Resident FTES Actual	326.21	383.38	638.92	421.65	1,770.16
	Resident FTES Deficit	-0.69	24.68	15.02	31.15	70.16
	Resident FTES % of Target	99.79	106.88	102.41	107.98	104.13
	Nonresident FTES Actual	23.61	42.44	58.38	17.36	141.79
	Total FTES Actual	349.83	425.81	697.30	439.01	1,911.95
	FTEF allocation	23.49	25.77	44.83	28.06	122.14
	FTEF Staffed	23.34	29.57	49.51	28.82	131.24
	FTEF Unstaffed					
	Productivity	14.99	14.40	14.08	15.23	14.57
	Dual Enrl Sections	2	1	2	2	7
	Dual Enrl FTES	2.00	1.61	10.35	11.44	25.40
	Dual Enrl FTEF	0.19	0.20	0.60	0.57	1.57
	Fall 2019	Resident FTES Target	1,471.05	1,614.15	2,807.55	1,757.25
Resident FTES Actual		1,325.54	1,424.95	2,765.63	1,760.95	7,277.07
Resident FTES Deficit		-145.51	-189.20	-41.92	3.70	-372.93
Resident FTES % of Target		90.11	88.28	98.51	100.21	95.13
Nonresident FTES Actual		88.87	180.34	233.87	65.51	568.59
Total FTES Actual		1,414.41	1,605.28	2,999.50	1,826.47	7,845.66
FTEF allocation		105.70	115.97	201.72	126.25	549.64
FTEF Staffed		95.22	105.80	210.38	114.73	526.12
FTEF Unstaffed						
Productivity		14.85	15.17	14.26	15.92	14.91
Dual Enrl Sections		12	4	16	26	58
Dual Enrl FTES		28.37	12.20	47.43	94.91	182.91
Dual Enrl FTEF		2.29	0.87	3.43	6.07	12.66
Spring 2020		Resident FTES Target	1,471.05	1,614.15	2,807.55	1,757.25
	Resident FTES Actual	1,375.56	1,466.88	2,630.47	1,615.70	7,088.61
	Resident FTES Deficit	-95.49	-147.27	-177.08	-141.55	-561.39
	Resident FTES % of Target	93.51	90.88	93.69	91.94	92.66
	Nonresident FTES Actual	93.40	198.52	216.30	62.05	570.26
	Total FTES Actual	1,468.96	1,665.40	2,846.77	1,677.75	7,658.87
	FTEF allocation	92.47	101.46	176.47	110.45	480.85
	FTEF Staffed	100.60	112.76	188.71	111.43	513.50
	FTEF Unstaffed	0.29			0.33	
	Productivity	14.60	14.77	15.09	15.06	14.91
	Dual Enrl Sections	11	15	19	29	74
	Dual Enrl FTES	25.79	20.03	54.90	90.73	191.44
	Dual Enrl FTEF	1.95	1.47	4.86	6.65	14.93

Figure 2: District-wide Enrollment for 2019-20 Summer, Fall, and Spring semesters, as shown by Power Business Intelligence Platform on October 15, 2020.

Moving forward, the College will continue to use the practices within its SEM Plan. Following the anomalies of 2020-21, the College fully expects to resume its success toward achievement of the following enrollment goals:

Year	Res. FTES	FTEF	FTES/ FTEF	Units per student (excluding dual enrolled)	Dual Enr. FTES	Dual Enr. FTEF	Awards
2018-19	6171.5 1	470	14.09	9.6	125.91	9.0	1082
2019-20	6035.0 2	423	14.59	9.4	112.68	8.9	1160*
2020-21 (Projected.)**	5000.8	376	14.0	9.0	180	13.0	1000
2021-22	6332.5	425	14.9	9.6	207.7	15	1195
2022-23	6885	450	15.3	10.2	248.8	18	1280
2023-24	7379	470	15.7	11.0	290.2	21	1480

Table 2: Laney College Enrollment Goals

*30% increase over 5 years, 10% more than Vision for Success statewide goal. Forecast is projected based on continuing a 6% climb per year.

**As the report was filed in November 2020, Spring 2021 and 2020-21 numbers are projections. Also, with most courses offered online in 2020-21, data should be considered an anomaly and product of disruption to progress made in two previous years.

As previously stated, the College’s SEM Plan provides progress on all of the specific goals within the plan, but specific activities of the Plan are highlighted within this Special Report because they will resume the College’s progress toward achievement of the above metrics and help it work toward greater financial solvency. The activities outlined in this section are as follows:

- Pathway-Based Schedule Building
- Projection-Based Schedule Planning
- Growth & Support of Later Starting Classes
- Support of Programs with Declining Enrollments
- Consistent Lecture Start/End Times
- Meeting Demand for Online Classes
- Continued Online Academic & Counseling Support
- Expanding Dual Enrollment

Continued Implementation of Pathway-Based Schedule Building:

The College’s Guided Pathways (GP) efforts have worked synergistically with these program-level planning efforts as the College works to increase program completions among students. This work first began in early Spring 2019, when disciplines created 2- and 3-year degree schedules at the Spring 2019 Department Chairs retreat (1-12) to show classes required in disciplines for both full- and part-time students to complete their coursework. Within those plans, capstone courses were identified so that they would be allowed to run with lower enrollments. As a bonus, capstone course enrollment will allow the College to claim funding for both FTES and awards under the guidelines of the SCFF.

The College has also engaged in schedule planning relative to “meta-majors”. This aspect of Guided Pathways at the College is best known as the Areas of Interest initiative. During this time, eight meta-majors were identified and shared with the Campus community in October 2019, with each discipline identifying an area during the Spring 2020 Department Chairs Retreat (1-13). The efforts have since been bolstered by the College’s completion and publication of Pathways Maps (1-14) as a Wave 3 (or 3rd cohort) College in the California Community College Chancellor’s Office Program Mapper Project, in collaboration with web developer Concentric Sky. As of August 2020, Laney College had become just the 9th of 33 participating schools in the state to publish its Areas of Interest (Meta-majors), degrees and certificates using the statewide mapping on its College website, and it continues to promote this innovative movement through marketing venues such as social media. The program maps communicate the full range of majors, with just over 50% of them providing students with job and program information about the College’s many Career Education offerings.

This review of programs and move toward greater recognition of degrees and certificates through the Guided Pathways initiative is projected to lead to greater program award numbers moving forward. In addition to helping students transfer and gain employment, this positive direction will also position the College to claim greater revenues as they relate to the Student Success portion of the Student-Centered Funding Formula.

Projection-Based Scheduling

As of Fall 2020, the College is now in its third year of scheduling using enrollment projections rather than the simple roll-over of the previous year’s schedule, which was past practice. Data – the previous three identical semester enrollment numbers – inform scheduling decisions, and chairs and deans input sections into a spreadsheet called a Scheduling Matrix (1-15) that shows the following:

- a) Class sections scheduled
- b) Hours scheduled against a pre-entered allocation
- c) FTES Projected
- d) Anticipated Costs for the Discipline for Scheduling
- e) Planning of late-starting classes based on demand

Course	Course	LEC	LAB	Total Hours Per Section	Average Number of Spring Sections	Number of Spring 2019 Sections	Total Hours	Enrolled Per Section at Census	Total Headcount Per Course	Average ftes per section	Fill Rate	PRODUCTIVITY	TOTAL FTES
Annual-Term Course	Title												
1	EXPLORING ISSUES	3	0	3	5	3	9	44	132	4.48	110%	22.39	13.44
5	MANAGING ISSUES	3	0	3	0	1	3	29	29	2.90	73%	14.50	2.90
9	SAFETY	2	0	2	0	0	0	0	0	0.00	0%	#DIV/0!	0.00
14	STATIONS	3	0	3	0	1	3	21	21	2.10	53%	10.50	2.10
20	MAKING CHANGE	1	0	1	1	0	0	20	0	0.67	50%	#DIV/0!	0.00
	TOTALS					5	15		182	10.15		18.44	18.44
Start or Online Courses	Hours/Units							Enrollment					
						5	15		182	3.69		TOTAL FTES	18.43571429
Growth Courses: (Up to 5% beyond allocation; list according to priority) -													
						TOTAL SECTIONS	TOTAL HOURS		TOTAL ENROLLED	dept ftes per section			
						TOTAL ALLOCATED HOURS			15	1.00			
						HOURS SCHEDULED			15	1.00			
						HOURS REMAINING			0	0.00			
Course Reductions from Allocation:													
											FTES V. FTEF DIFFERENTIAL		0.09%
											PRODUCTIVITY		18.43571429
						AVERAGE CLASS SIZE							
						36.4							

Figure 3: Laney College Instruction Office Sample Scheduling Matrix

Moving forward, projection tools such as [this](#) will take awards into account as well as per-student funding amounts for the Supplemental Allocation so that schedules reflect the entirety of the SCFF. This step also addresses a portion of Section 2 ([Establishing a Student Success Infrastructure Plan to comply with the Student-Centered Funding Formula as announced by the California Community College Chancellor’s Office](#)) of this Special Report.

Review/Restoration of Programs with Declining Enrollments

The College has identified and begun to support programs in which enrollments and completions are declining. Specifically, a three-year analysis produced data showing ten disciplines had low or falling enrollments (as defined by FTES/FTEF productivity under 12.0) and low or falling award outcomes, and schedules were modified with the intent of improving total enrollments and FTES/FTEF productivity ([1-16](#)). The list of these disciplines was disseminated to area deans and department chairs in all four instructional divisions, with three disciplines showing immediate improvement and all others producing 2- and/or 3-year long-term schedule plans. (It should be noted that these plans have become the Program Maps ([1-17](#)) now found on the College website.)

The College currently does not have programs slated for potential program discontinuance. If a program is put forward for viability considerations, it is upon conclusion of each year’s program review process, sometime in the middle of Spring semester. Based on data from Comprehensive Program Review (CPR, submitted by both instructional and service area every four years) or Annual Program Review (APR, due during in-between years), a program may be put forward for viability. These reviews and updates include quantitative and qualitative data analysis prescribed in Administrative Procedure 4021: Program Discontinuance/ Consolidation ([1-17.a](#)).

Consistent Lecture Start/End Times at Laney College and across Peralta

In Spring 2019, Faculty Senate leadership and Chief Instructional Officers gathered for a series of meetings to discuss the issues surrounding student “swirl”, or the phenomenon of students

attending more than one Peralta campus to complete their studies. Data provided (1-18) during the May 2019 gathering demonstrated that in the College's case, 18% of students attended classes on one other campus, with another 4% attending two others. One step subsequently identified was to examine if the start/end times were impacting students toward the decision to study at multiple campuses, in addition to the possible oversaturation of the same class being offered too much throughout the District (Page 14 of this report provides more information on the latter, specifically the POST technology platform that shows scheduling patterns at one college or across all four campuses within Peralta).

Concerning class meeting times, the College engaged in the following practices:

Adherence to Published Block Schedules: Analysis of the Fall 2018/Spring 2019 schedules demonstrated that a number of courses offerings had moved away from the start/end times published in the original the College block schedule, which included some classes holding lectures during College Hour. Moving into 2019-20 schedule production, the Instruction Office began to promote greater adherence to those starting/ending times. The average units per student has not yet seen an increase, but with scheduling practices built around the Pathway maps, the College is projected to meet the Units-per-Student goals it has set.

Modified District-Wide Block Schedule: As part of the enrollment management plan, the College then created a modified block schedule (1-19) to correspond with start and ending times for lecture classes (Lab and CTE cohort-style programs were not required to modify start times.) at the other three Peralta Colleges, which included adjusting the College Hour from 12:00-1:00pm to 12:30-1:30pm. This change was made beginning in the 2020-21 academic year. Resulting benefits have included the following:

- Consistent start times 5 days a week for lecture classes
- More morning and evening time blocks for classes – Specifically, students may now take up to three 3-hour lecture courses every day between 8:00am and 12:30pm. Previously, this had not been possible on Tuesdays and Thursdays.

Putting the former and current block schedules one after the other, as shown below, demonstrates the shift to more consistent class start and end times with each day (Note: these blocks are only excerpts showing Monday-Thursday until 5:00pm. The formerly used block schedule (1-20) and current block schedule (1-21) are included as evidence).

	3 unit M/W	3 unit M OR W	4 unit MW	5 unit mw	6 UNITS MW	6 UNITS MWF	3 unit TTH	3 unit T or TH	4 unit TTH	5 unit T TH	6 UNITS T TH
7:30 - 8:00 AM											
8:00 - 8:30 AM							7:30 8:45	7:30 8:45			
8:30 - 9:00 AM	8:00-9:15		8:00-9:50						8:00-9:50		
9:00 - 9:30 AM		8:00 10:50		8:00-10:15	8:00 10:50					8:00 10:15	
9:30 - 10:00 AM											9-11:50
10:00 - 10:30 AM		9:30-10:45				9 10:50	9:00-10:15				
10:30 - 11:00 AM			10:00-11:50					9:00 11:50		10:00-11:50	
11:00 - 11:30 AM							10:30-11:45				
11:30 - 12:00 PM	11:00 12:15			10:30 - 12:45		11-12:50					
12:00 - 12:30 PM							12:00-1:00	12:00-1:00	12:00-1:00	12:30-1:30	12:30-1:30
12:30 - 1:00 PM	12:30 1:45	11- 1:50	12 - 1:50		11- 1:50		College Hour	College Hour	College Hour	College Hour	College Hour
1:00 - 1:30 PM											
1:30 - 2:00 PM							1:00-2:15		1:00 - 2:50		
2:00 - 2:30 PM				1:00 - 3:15		1 2:50				1:00 - 3:15	1-3:50
2:30 - 3:00 PM			2 - 3:50					1:30- 3:50	2 3:50		
3:00 - 3:30 PM	3:00 4:15				2 - 4:50		2:30 3:45				
3:30 - 4:00 PM											
4:00 - 4:30 PM						3- 5:50					
4:30 - 5:00 PM				3:30 - 5:45						3:30 - 5:45	

	3 unit M/W OR T/TH	3 unit M, T, W, TH OR F	4 unit M/W OR T/TH	4 unit M, T, W, TH OR F	5 unit MW or TTH	6 UNITS MW or T TH	6 UNITS MWF
7:30 - 8:00 AM							
8:00 - 8:30 AM							
8:30 - 9:00 AM	8:00 9:20 M/W or T/Th		8:00 9:50		7:30 - 9:45		8:00 9:50
9:00 - 9:30 AM							
9:30 - 10:00 AM	9:30 10:50 M/W or T/Th	8:00 10:50 OR 9:30 TO 12:20		8 - 11:50 OR 8:30 TO 12:20		8:00-10:50 OR 9:30 TO 12:20	10:00 11:50
10:00 - 10:30 AM			10:00-11:50				
10:30 - 11:00 AM					10:00 - 12:15		
11:00 - 11:30 AM	11:00 12:20 M/W or T/Th						
11:30 - 12:00 PM							
12:00 - 12:30 PM							
12:30 - 1:00 PM	12:30-1:30 College Hour	12:30-1:30 College Hour	12:30-1:30 College Hour	12:30-1:30 College Hour	12:30-1:30 College Hour	12:30-1:30 College Hour	12:30-1:30 College Hour
1:00 - 1:30 PM							
1:30 - 2:00 PM	1:30 2:50 M/W or T/Th		1:30 - 3:20		1:30 3:45		
2:00 - 2:30 PM							
2:30 - 3:00 PM		1:30 - 4:20 or 3:00 - 5:50		1:30 5:20 OR 2:00 - 5:50		1:30 - 4:20 or 3:00 - 5:50	
3:00 - 3:30 PM	3:00-4:20 M/W or T/Th						
3:30 - 4:00 PM			3:30 - 5:20 or 4:00 to				3- 5:50
4:00 - 4:30 PM							
4:30 - 5:00 PM					3:30 - 5:50		

Figures

4, 5: Block Schedules for Laney College, with College hours in light blue. Figure 4 shows block schedule followed until Fall 2020, with figure 5 showing block schedule adjusted to reflect those of other three Peralta colleges, including the daily College Hour.

Cross-District Scheduling Considerations in Planning: In Fall 2018, roughly one Laney College student in five (22%) (1-22) attended classes at one or two other Colleges in the Peralta District, demonstrating the “swirl” phenomena that exists among the four Peralta Colleges.

In collaboration with the other three Peralta Colleges, Laney College endeavors to schedule in a manner that serves students needing to attend more than one college but does not result in unintended competition or oversaturation of sections across the District. To support this effort, Deans and Department Chairs can now see scheduling of classes across the four Colleges using the recently implemented Peralta Online Scheduling Tool (POST) (1-23). (Figure 6, below, shows a cross-District analysis of Fall 2019 English Composition Classes offered in Peralta.) At the Spring Semester 2020 Department Chairs Retreat, a POST training was held by the Vice President of Instruction to assist deans and chairs as they built their 2020-21 Fall and Spring

schedules. The planning of the schedule for 2020-21 was the first time the College’s employees had an opportunity to use POST.

As users of the POST tool build schedules, they can view scheduling patterns at both Laney College and the other Peralta Colleges. Given that students frequently “swirl” among the Colleges (i.e. take courses at more than one site), this approach and technology will help the Colleges minimize the overscheduling of similar sections at the same time, which will also help the College as it moves toward its productivity goals of the next three years.

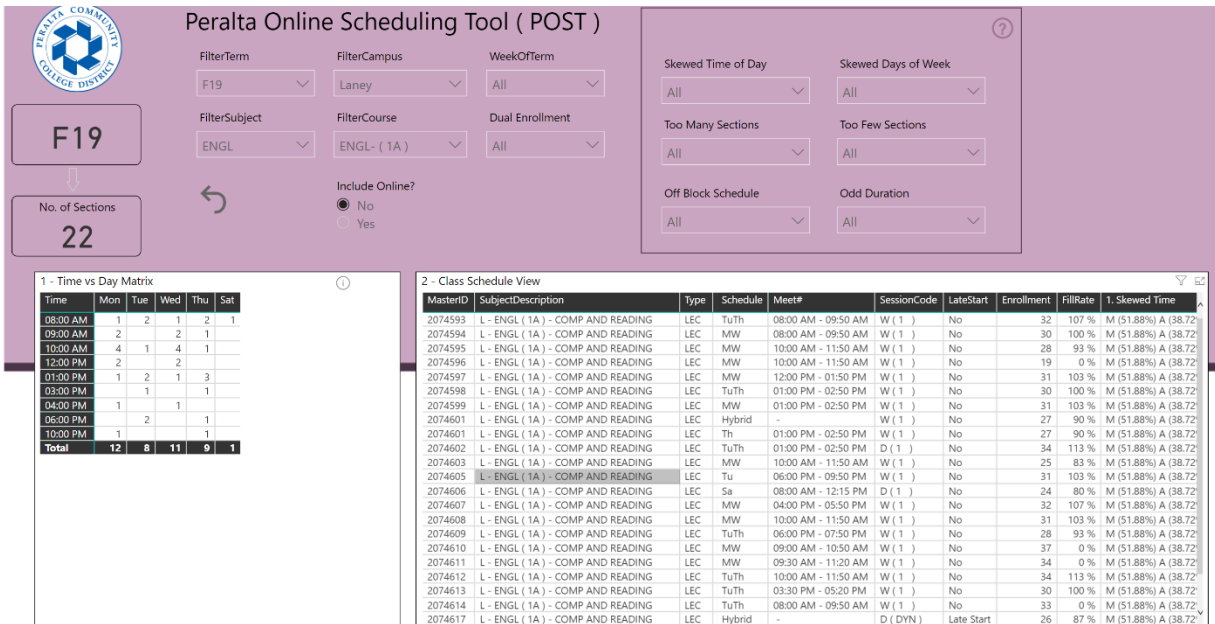


Figure 6: Screenshot of all Laney College English 1A Offerings in Peralta Online Scheduling Tool (POST).

Responsiveness to Online Demand

As the College has progressed through its SEM Plan efforts since Fall 2018, it has met the higher demand for online offerings that was demonstrated even prior to the Spring 2020 campus shutdown:

Laney College Online/Hybrid Offerings						
Year	Sections	Headcount	Enrollment	FTES	FTEF* (est.)	FTES/ FTEF (est.)
2017-18	214	5990	7129	810.82	42.8	18.9
2018-19	251	6603	7940	894.64	50.2	17.8
2019-20	322	8408	10,411	1169.06	64.4	18.15

Table 3: Enrollment Data for Online/Hybrid Offerings

*Due to lack of FTEF data for online, FTEF numbers were arrived at by dividing sections by 5, or on the (incorrect) assumption that every online class is 3 lecture units. The last two columns of data are for comparison purposes only and should not be interpreted as accurate.

To support online or web-enhanced classes as well as services to students, corresponding efforts were made in the following areas:

Student Support Online

As the College moves forward, it has identified online support for students as a priority. Online support is both an actionable improvement item and a key point in the Quality Focus Essay for its upcoming Institutional Self Evaluation Report (ISER) submission. The College had already begun to increase its numbers of online classes as demonstrated in Table 2. However, with its participation in the Online Education Initiative's Career Education Grant (OEI CE Grant), the College committed to increasing its number of online CTE courses (see Pathways Grant video, [1-24](#)) in May 2019, especially in the disciplines of Business, Construction Management, and Legal/Community Interpreting. Recruiting efforts for these programs have primarily focused on students taking classes in the English for Speakers of Other Languages (ESOL) discipline, which is the College's largest in terms of enrollment, with the intent of building a pipeline toward award and career attainment. Class offerings were then complemented by enhanced wraparound services including support for English Speakers of Other Languages, tutoring, and counseling services delivered through distance modes. This commitment resonates not only in the College's SEM Plan ([1-25](#)) but also its Distance Education Plan ([1-26](#)).

In the area of counseling, support has evolved from phone appointments to better leveraging of user-friendly technology. The department uses Zoom Video Conferencing, which allows counseling sessions to take place remotely, and students can schedule Zoom counseling appointments ([1-27](#)) on the department webpage. The Counseling department is reviewing another online counseling product, Cranium Café, which will allow student-friendly, ADA-compliant sessions to take place as students identify their pathways and receive other support.

Supporting online students beyond their virtual classrooms through Student Services and Learning Support efforts is also vital to their success. The College's categorical programs – including Financial Aid - have established chat features ([1-28](#)) on their home pages to support students remotely. Technology also will allow for students to more readily submit Financial Aid and other Enrollment Services-related documents electronically in 2020-21. In the area of academic support services, the newly named Student Success Center has become an online hub ([1-29](#)) for tutoring in various subjects, in addition to providing tutorials and assistance with using platforms such as Canvas and Zoom. Finally, embedded tutoring has increased at the College, especially in the areas of Math and English. Tutor training had already ramped up to support students post-AB705. As a result of such planning and implementation, all sections of English 1A (Composition and Reading) were staffed with embedded tutors in Summer 2020, and all 1A instructors were offered tutors in Fall 2020. Continued student support is projected to result in higher retention and persistence rates for online/hybrid courses, which should benefit overall FTES and FTES/FTEF numbers as the College works toward meeting the enrollment goals laid out at the beginning of this section.

Expanding Dual Enrollment

Since 2018, the College has either maintained or increased its high number of dual enrollment offerings for high school students, with most classes meeting on the high school campuses

themselves. In 2019 the District established an AB288 agreement which allowed for collection of FTES by the Colleges as well as the high schools. The effort has consisted of work by the Outreach Office and Welcome Center Staff, along with the Dean of Humanities, Social Sciences and Applied Technologies, whom the Vice President of Instruction identified as the Dual Enrollment Liaison. This two-pronged relations strategy served to further develop partnerships with local high schools in the Oakland Unified School District (OUSD) that have resulted in course tracks toward CSU/IGETC transfer patterns and career certificates in areas such as Carpentry. While it took some time to develop these partnerships, dual enrollment course offerings have steadily increased each year along with the development of innovative programs, including a summer series of on-campus, cross-discipline (Chemistry, Biosciences, Culinary Arts) college engagement courses built around Nutrition that are offered to Oakland-area high school students.

As the College continues to implement pathways-based scheduling through dual enrollment, the College anticipates the following benefits relative to enrollment management:

- A) A two-tiered approach to outreach that will focus on students and recent graduates of OUSD high schools (including dual enrollment efforts), as well as students who are over 24, working, and likely to attend school part-time
- B) Increased awareness of offerings and programs among OUSD and Alameda Unified School District (AUSD) graduates
- C) Higher numbers of OUSD and AUSD high school graduates eventually enrolling at Laney College.
- D) Higher numbers of OUSD and AUSD high school graduates completing degree and certificate requirements, thus increasing award numbers;
- E) Greater funding to the College of Special Admit students at the state’s full apportionment rate.

Below are the enrollment objectives the College has identified through 2023-24. (NOTE: Although the College’s raw dual enrollment FTEF was slightly lower in 2019-20, it nonetheless accounted for a higher percentage of the total schedule, as overall FTEF in 2019-20 had been decreased from the previous year.)

Year	Dual Enrollment. FTES	Dual Enrollment. FTEF
2018-19	125.91	9.0
2019-20	112.68	8.9
2020-21 (Projected)	180	13.0
2021-22	207.7	15
2022-23	248.8	18
2023-24	290.2	21

Table 4: Laney College Dual Enrollment Allocations and Apportionment, Including Goals through 2023-24.

Summary: The College continues to implement components of our SEM Plan toward the goal of increased student completion of degrees and certificates. By honoring and completing the objectives within the SEM Plan, the College has improved scheduling practices to boost enrollment numbers, enhanced student support, and increased outreach efforts, including Dual Enrollment. Moving forward, these efforts will result in more graduations, transfer, and career attainment/advancement, which will benefit students personally and the College financially, especially given the new landscape that includes the Student-Centered Funding Formula.

2) Establishing a Student Success Infrastructure Plan to comply with the Student-Centered Funding Formula as announced by the California Community College Chancellor's Office

The College is preparing itself to leverage state funding within the framework of the Student-Centered Funding Formula (SCFF) (2-01). As details of this new model emerged, the College President prioritized presenting and discussing the SCFF with the campus community, most notably during the May 2018 College Council Meeting (2-02) and as part of the Spring 2019 planning retreat (2-03). Also, in preparation for this Special Report, the four PCCD Colleges engaged in discussions with President of ACCJC (Accrediting Commission for Community and Junior Colleges), Dr. Stephanie Droker, to clarify how the Colleges were to identify how they were addressing the Supplemental and Student Success portions identified in the Student-Centered Funding Formula (SCFF).

The SCFF metrics include the existing Base Allocation, which is largely based on census enrollment; the Supplemental allocation, based on students receiving a College Promise Grant, students receiving a Pell Grant, and as well as those covered by AB (Assembly Bill) 540; and the Student Success Allocation based on outcomes that include the number of students earning associate degrees and credit certificates, transferring to four-year colleges and universities, completing transfer-level math and English within their first year, completing nine or more career education units, and attaining the regional living wage. This information has been communicated to the campus at gatherings that include a department chairs meeting in Fall 2018 (2-04).

The previous section detailed the College's efforts related to FTES generation, which accounts for the Base Allocation portion of the SCFF, which will eventually account for 60% of how California Community Colleges are funded. This section will demonstrate strategies and actions taken to impact both the Supplemental and Student Success portions of the SCFF allocation.

Supplemental Allocation- Financial Aid

The College is positioned to meet its goals relative to maximizing the Supplemental Allocation of the Student-Centered Funding Formula, especially as it relates to Financial Aid.

Decentralization: The four Colleges of the PCCD have recently received local control of Financial Aid processes by acquiring a Director of Financial Aid at each site. This hire was a

result of decentralization efforts by the two previous permanent Chancellors to strengthen the financial aid programs at the Colleges. Laney’s new director was hired (2-05) during the 2019-2020 academic year. Due in part to the director-level investment in leadership, the College was able to hire a qualified candidate with extensive experience in community college and university financial aid systems.

To ensure further success with decentralization, the District hired Marla Williams-Powell, a consultant experienced in financial aid processes to review previous audit findings and provide recommendations to strengthen all four Colleges’ financial aid departments.

By the Numbers: Analysis from the State Chancellor’s Office (2-06) indicates that between 2018-19 (2-07) and 2019-20 (2-08), the College has seen an 8% decrease in the total number of financial aid awards, from 21,134 to 19,398. The number of students who received awards decreased by 14%, from 8,122 to 6,965. The number of students who received the California College Promise Grant also decreased by 15%, from 8,063 students to 6,858. However, the number of students who received Supplemental Educational Opportunity Grant (SEOG) increased by 20%, from 700 to 840.

The following table details all types of financial awards, specifically the percentage of increase or decrease in the number of awards. Although scholarships and both types of Federal Direct loans saw sharp drops in 2019-20, Federal SEOG’s, Cal Grants, Federal Work Study, and the Student Success Completion Grants all saw increases.

Award Type	2018-2019	2019-2020	Change
FAFSA Rate	82%	76%	-7%
California College Promise Grant	12,755	10,562	-17%
Pell Grant	4,773	4,362	-9%
AB540	262	213	-19%
SEOG	1,204	1,422	18%
Cal Grant B	867	967	11%
Cal Grant C	166	201	21%
Federal Work Study	119	134	13%
Fed. Direct Loan-Subsidized	191	148	-23%
Fed. Direct Loan-Unsubsidized	171	136	-20%
Student Success Completion Grant	544	646	19%
Scholarships	44	19	-57%

Table #5: 2018-19, 2019-20 Financial Aid Data (Number and type of financial aid awarded to Laney College students between 2018-19 and 2019-20, according to the California Community College Chancellor’s Office Management Information Systems Data Mart.)

The College has increased its efforts to increase FAFSA completion rates and awards for students into its financial aid outreach efforts, as noted in the SEM Plan. To meet the benchmark in Table 6 (p.26), the College has taken the following actions:

- **Collaboration with Community Partners:** The Financial Aid Department partnered with the East Bay Consortium to host a Cash4College event ([2-09](#)) on campus on February 22, 2020.
- **Staffing:** The College hired a full-time Financial Aid Director in May 2020 to oversee the daily office responsibilities, regulatory practices, and coordination with staff on financial aid outreach/in-reach practices and implementation to the student population and targeted student groups, such as learning communities for the fall 2020-spring 2021 semesters. In addition, analyzed past and current data trends and developed an action plan to increase FAFSA completion rates and awards
- **Updating the Financial Aid web pages to highlight the following student supports:**
 - o Financial Aid Instant Chat ([2-10](#)), which allows students to connect in real time with a Financial Aid Staff member
 - o Financial Aid Workshop video ([2-11](#)) promoting financial aid assistance and showing steps to apply
- **Enhanced Information:** Creation of Financial Aid Satisfactory Academic Progress Steps ([2-12](#)), a guide for students to use after they complete the FAFSA application
- **Outreach/Recruitment:** Hosting of Enrollment Services Virtual Recruitment Webinars as well as a Virtual Open House event ([2-13](#)). During these August 12 and 19, 2020 events, the Director of Financial Aid presented on the types of awards available and the steps to apply **WHAT WERE THE OUTCOMES?**
- **Adoption of Case Management Structure:** The Financial Aid Office now has a case management structure that serves students based on their last name. The Financial Aid staff case load information is located on the website. Students now know who to contact directly if they need assistance and can schedule an appointment through the online Scheduling and Reporting System (SARS) appointment system.
- **Collaboration:** All Peralta campuses collaborated with the District Financial Aid Analyst to develop and update processes and procedures, resulting in the creation of the PCCD Financial Aid Policies and Procedures Manual, 2020-2021 ([2-14](#)).

Future Planning:

- In Spring 2021 the College will implement the Campus Logic technology tool to more effectively award students who were selected for verification by the Department of Education after they have been onboarded for financial aid with outstanding requirements. This system will promote a higher percentage of file completion.
- The Financial Aid office will work collaboratively with College learning community offices (EOPS, CalWORKs, Puente) to do financial aid outreach and assist students, modeling more of a case management approach, one that resonates with the SEM Plan. The goal is to provide customized financial aid assistance in the form of individualized case management to assist students from the time of application through financial literacy and other campus resources, as well as working within service areas to further promote student success and completion by mitigating educational financial barriers.
- The Financial Aid Office will collaborate with the Guided Pathways Areas of Interest teams and include the financial aid process as a key feature in supporting students.

Identified Goals or Activities	2018-2019	2019-2020	2020-21 (Projection)	2021-22 Goal	2022-23 Goal	2023-24 Goals
Increase FAFSA Completion Rate <i>Activity:</i> Offer FAFSA Completion Workshops- Fall 2020-Spring 2021	82%	76% (-7%)	70%	80%	84%	87%
Increase California College Promise Grant <i>Activity:</i> Promote the new online CCPG application for easier completion through social media and email blast- Fall 2020-Spring 2021	8063	6,858(-14.9%)	6,035(-12%)	6,858 (+12%)	7,269 (+6%)	7,705 (+6%)
Increase Pell Grant Recipients <i>Activity:</i> Promotion of case management approach and individual student appointments with FA Specialist- Fall 2020-Spring 2021	4773	4362 (-8%)	3850 (-12%)	4400 (+12.5%)	4773 (+7%)	5012 (+5%)
Increase AB540 Aid Recipients <i>Activity:</i> Promotion of case management approach and individual student appointments with FA Specialist- Fall 2020-Spring 2021	262	213 (-19%)	187 (-12%)	220 (12.5%)	262 (+7%)	275 (+5%)

Table 6: Financial Aid Data, Goals through 2023-24

Conclusion

The College has identified increasing student participation in Financial Aid opportunities as a principal goal through the aforementioned changes. These numbers have been impacted by falling enrollments, although the increase in Promise Grant students suggests that increases are possible. Moving forward the approach will be to restore participation within two years to 2019-20 levels toward an eventual 5% increase in FAFSA, Pell and AB540 indicators in 2023-24:

Student Success Allocation

The College will work to improve the following key indicators to promote completion of awards as well as transfer and attainment/advancement in the workplace.

A. Math/English Transfer Numbers

Whether the Math/English transfer numbers directly figure into the College's SCFF allocations or not, this metric is a key component, as transfer work in the two disciplines is required for most degrees and certificates. Below are the goals the College is seeking, specifically to increase success numbers. It should be noted that the rate of new students who completed Transfer math and English within a year was noticeably higher in Fall 2019, as English increased by more than 4% and math by nearly 15%. That semester was when the College's math and English offerings were almost all at the transfer level, as District math and English faculty voted to move to default placement of students. Given the initial success of support courses and embedded tutoring in these two disciplines, the College is anticipating increasing those numbers by 5% by 2023-24, as indicated in the following table (2-15):

	Math Success Overall	Math Success within 1 year	Math Success more than 1 year	English Success Overall	English Success within 1 year	English Success more than 1 year
Fall 2017	62.2%	62.7%	61.9%	67%	64.4%	69%
Fall 2018	62.4%	59.5%	63.7%	66.3%	64.5%	67.7%
Fall 2019	62.9%	74.1%	62.2%	60.4%	69%	59.9%
Fall 2020*	No data	No data	No data	No data	No data	No data
Fall 2021 (goal)	63.5%	75%	65%	68%	70%	65%
Fall 2022 (goal)	71.5%	77%	67%	71%	72.5%	67%
Fall 2023 (goal)	75%	79.1%	70%	73%	75%	70%

Table 7: Success Rate Data, Goals for Transfer Math, English through 2023-24, Business Intelligence

To promote an increase in math/English success, the College will continue its efforts relative to the following:

- Embedded tutoring in “AB705” English and math courses – In Spring 2020, this was done in English 1A, as all courses were forced to move online. During that semester, the success rate exceeded 85% (85.2%), with assigned tutors in most sections.
- Further support for Guided Self-Placement and Bridge to Credit efforts for students enrolled in ESOL courses. With implementation also beginning to align with AB705 requirements, the College will be assessing the outcomes of these efforts and conducting data-informed evaluation to ensure that second-language learners’ orientation, placement, prior learning and experience position them to be successful. With the last ESOL proficiency level available as hybrid offerings, students transitioning to English, transfer, or career education have technology competencies that are unique in the state.
- FTEF allocation continuing to be set aside for support courses for transfer math and English. This includes a newly created ESOL course to support students transitioning from ESOL to transfer-level English.

B. Allowance for lower-enrolled capstone courses, especially for Career Education Programs

As previously noted, the College seeks to increase program completion numbers. To do so, it will plan its semesters on the premise that capstone or latter courses will need to run at times with lower enrollment numbers, and programs or divisions balanced to allow for this to happen with fiscal prudence. With attrition leading to lower class sizes in the final semester(s) of programs, colleges are faced with the decision of either running, cutting or offering alternatives such as independent study to the few students enrolled. As attendance at census (the 20% point of the term) had been the only determining factor for apportionment, such completion courses were often vulnerable to cancellation. Moving forward under the new funding formula, this program-completion approach will allow for more students to be graduates entering the workforce, but it also means that students in a capstone course can potentially represent double funding for the College: once for FTES apportionment and a second time for award completion.

The strategy of preserving lower-enrolled capstone courses is also noted on page 18 of the College’s SEM Plan ([2-16](#)).

C. Investment in technology to enable Laney College to auto-award degrees and certificates.

Laney College students accumulate five more units in obtaining a degree than the statewide average. In fact, in 2018-19, they took on average 99 units to earn what are typically 60-unit associate degrees ([2-17](#)). Having a system that automatically confers degrees and certificates will aid students while helping the College achieve its goals of increased awards.

With the goals stated in the table below, the College will be positioned to claim Student Success Funding within the SCFF for Degrees for Transfer and Certificates of Accomplishment (Data on 2018-19 and 2019-20 awards was shared at the College Opening Day Plenary):

Year	Transfer Degree Awards	Non-ADT Associate Degree Awards	Certificates of Achievement	Certificates of Proficiency	Non- credit certificates	Awards
2018-19	149	590	289	38	16	1082
2019-20	166	576	353	36	29	1160
2020-21 (Projected)	150	500	300	30	20	1000
2021-22	205	500	380	50	60	1195
2022-23	250	485	410	60	75	1280
2023-24	345	475	475	85	100	1480

Table 8: Data on Awards, Including Goals through 2023-24

With the above goals supported by our SEM Plan Goals, Objectives, and Activities, the College will qualify itself for the best Student Success funding scenario, as shown by the following considerations:

1. Graduates will have more courses guaranteed to transfer with the ADT degrees, which will also bring the highest dollar-value-per-award amount to the College. Laney College is already well-positioned, having increased its number of degrees for transfer to 24 as of the 2019-20 catalog ([2-18](#)).
2. Though Certificates of Proficiency and non-credit do not carry point values in the state funding formula, both will still be of value to the College. As most of the former are associated with career programs, students completing them will likely reach the 9-unit threshold that qualifies colleges for funding under the SCFF. Concerning the latter, non-credit courses are fully funded regardless of certificate completion at the full apportionment rate, and given the high enrollment numbers in ESOL, they will continue to be a positive revenue source for the College, even if dollars are claimed through positive attendance. And all awards move students closer to obtaining living wages.
3. The Transfer Center will extend transfer-related support through in-reach activities. These will include more virtual programming that will enhance annual transfer activities. The College collaborated with sister colleges to host a Virtual Transfer Day on Tuesday, Oct. 5, 2020 ([2-19](#)). Additional partnerships and activities include the Transfer Opportunity Program with UC Davis, transfer-related workshops offered throughout the semester, office hours for university representatives to meet with students, and the creation of transfer webinars/workshops on topics such as TAG Agreements and how to write personal statements – all scheduled for implementation in the fall 2020 semester.

These efforts will strive to increase the rates of transfer as well as facilitate the process for our students.

3) Establishing guidelines to reduce operation overspending and eliminate the structural deficit

The College's Administrative Services Division has conscientiously worked towards reducing operation overspending and elimination of the structural deficit by taking the following steps:

1. **Providing additional training:** The College has provided a series of trainings to cost center managers, which are housed here: *Business Office Budget Training and Presentations* ([3-01](#)). Training was provided in January, March and June. Training included the following: administrative procedures; purchasing – including requisitions, BTRs (budget transfers) and petty cash; personnel functions including ePAF, timesheets and travel; and budget trainings (specifically conducting queries and examining budget overview). Trainings were designed to heighten skill, knowledge and effectiveness of personnel interacting with the budget at our site, ensure uniformity of action, and drive adherence to best practices.
2. **Aligning budget development practices more closely with Standard Operating Procedures (SOPs):** The College has created Administrative Standard Operating Procedures (SOPs) ([3-02](#)), which are now published on our website and have been broadcast to the College community. The College has worked towards ensuring that budget development is aligned with the SOPs held at the College and PCCD Board Policies and Administrative procedures.
3. **Refining Standard Operating Procedures further to align with District Board Policies and Administrative Policies (BPs/APs):** The College has also sought to further refine existing SOPs to address any changes in policy/procedure or to heighten efficiency/effectiveness. One such example was the Petty Cash process which is included in the January 2020 Training Refresher on our website: *Business Office Budget Training and Presentations* ([3-03](#))
4. **Increasing campus-wide awareness of the budget development process and its associated timeline:** The budget development calendar and process has been widely shared with college stakeholders to include participatory governance groups. The aim is to heighten awareness of the process, the parameters, and the challenges associated with budget creation each year. An increase in stakeholder knowledge should result in a corresponding decrease in overspending and support the elimination of the structural

deficit. The January 20-21 budget presentation is included here: *Business Office Budget Training and Presentations* ([3-04](#))

- 5. Providing oversight of instructional allocations:** Each fall semester, the Vice Chancellor of Academic Affairs provides the Vice Presidents of Instruction with Enrollment Targets, including Full-Time Equivalent Faculty (FTEF) allocations for each college. The College schedules its course offerings within the allocation provided. (NOTE: Enrollment reports would seem to indicate that the College has exceeded its allocations, but that is not the case. Dual enrollment courses are not counted against the Colleges' FTEF allocations, though this is not reflected in the Business Intelligence Reporting Tools. In Summer and Fall 2019, the District also allowed the Colleges to schedule dual enrollment and Career Development and College Proficiency (CDCP) classes over and above their base allocations, but this additional instruction also was not added to the Colleges' allocations or reflected in Business Intelligence. In Spring 2020, the Vice President of Instruction requested and was granted additional allocation by the District to account for AB705 support courses.

4) Adopting a board policy to reflect sustainable fund balances and reserves (subcategory - Lack of Adherence to Board Policies & Administrative Procedures)

The College does not have responsibility for adoption of Board Policies. Please refer to Part Two of this report for information on the District's action.

The College follows Board Policies and Administrative Procedures related to financial stability and sound fiscal practice. Most recently, it adhered when it submitted its Two-Year Parcel Tax Usage Plan ([4-01](#)) through its participatory governance processes toward the District Participatory Governance Council and the District Planning and Budget Committee in compliance with fiscal policies and procedures outlined in Board Policy 6471 ([4-02](#)) and Administrative Procedure 6741, which detail the new parcel tax funding process ([4-03](#)). The plan outlines how dollars received from the parcel tax (approximately \$2 million dollars per year for the College) are spent strictly on classroom instruction, counseling, and student success activities as outlined in AP 6471. As per the same Administrative Procedure these expenditures are linked to specific Student Success Metrics and Laney College Strategic Priorities, PCCD Strategic Goals, and the California Community College Chancellor's Office Vision for Success.

The College also follows Board Policies and Administrative Procedures in its shared governance processes including program review, curriculum development, facilities and technology, planning and budgeting, and institutional effectiveness.

5) Adopting a restructuring plan to improve efficiencies and accountability at the District office and the Colleges

At the time of this report, the College was experiencing a transition in the President's Office, but the personnel infrastructure of the College remains largely unchanged dating back to 2017. At the time, there was a restructuring in the Administrative Division, with the Business Services Supervisor position being eliminated and replaced with the creation of a Director of Facilities & College Operations and the Vice President of Administrative Services positions. The Director of Facilities & College Operations assumed responsibility for custodial services, facilities rental, storekeeping services, the instructional media center, and later, locker room attendants, with 22 direct reports.

As can be seen in the 2020-2021 Administration Organization Chart ([5-01](#)), the Vice President of Administrative Services was assigned responsibility for oversight of Facilities & College Operations, College Information Technology Services, and Food Services. Direct reports include the Director/Manager over each of these divisions and include the: Cashier's (Bursar) Office and Business Office personnel.

No further restructuring is planned at this time, as the College is trying to have vacant leadership positions filled promptly. At the current time, some key positions need to be permanently filled as seen in the College's 2020-2021 Organizational Chart ([5-02](#)). The Administration moved quickly to address the following vacancies, filling several from within our personnel ranks as interim/acting positions, with the Vice President of Instruction serving as the Interim President since June 2020:

- Vice President of Instruction - Filled on an Acting basis by the Dean of Humanities and Social Sciences.
- Dean of Student Services - Voluntary resignation that was filled in Fall 2020 by an interim hire.
- Dean of Math & Sciences - The position is not vacant but was vacated while the Dean is serving as the Interim Vice President of Instruction at Merritt College. To fill this need, an Acting Dean was appointed at the Board meeting on September 15, 2020 ([5-03](#)), (Section 1.3, Public Employee Appointments). The College expects to have a long-term resolution to this role by early Spring semester 2021.
- Dean of Humanities & Social Sciences - An Acting Dean was appointed at the Board meeting on September 15, 2020. This action was necessary because the current Dean is serving as Acting Vice President of Instruction.

The encouraging note at the College is that the executive leadership team dating back to 2018 has largely remained intact, allowing for a level of continuity during this time of transition. More information regarding the transition plan through the dean level is noted in Section 8 of Part One.

6) Addressing all audit findings

The College's Administrative Services Department has worked in partnership with all areas of both the College and the District that are involved in audits and in addressing audit findings.

One direct finding related to the College was posted on the Internal Audit homepage contained in the Annual Financial Report for the year ending June 30, 2019 ([6-01](#)), completed by an independent auditor, the Eide Bailly LLP firm. The finding was noted as 2019-006, in the Findings and Questioned Costs section of the report.

In summary, the finding was related to Direct Loan Reconciliations. The College, which oversees financial aid at its decentralized level for its students, must promise to comply with applicable regulations and must agree to reconcile institutional records with Direct Loan funds on a monthly basis as required by the Code of Federal Regulations (34 CFR 685.300 (b)(5)) ([6-02](#)).

The **condition** was noted as a "significant deficiency". In review of the Direct Loans, the College was unable to provide adequate documentation to show that the Institutional Direct Loan was being reconciled. There were no **questioned costs** associated with the noncompliance. In context the District disbursed approximately \$2,418,994 in direct loan funds during the 2019 fiscal year.

The **effect** was that the District was found to be out of compliance with 34 CFR 685.300(b)(5). The **cause** was determined to be that the District is not implementing policies and procedures to verify that the institutional Direct Loan records are being reconciled to the School Account Statement (SAS) data files on a monthly basis. This was a new finding.

The **recommendation** was that the District develop and implement policies and procedures to ensure that the institutional Direct Loan records are being reconciled with the SAS data file received by Common Origination & Disbursement (COD) at the US Department of Education on a monthly basis.

As a **corrective action plan**, the District hired a Director of Financial Aid and an Internal Auditor to develop policy and procedures to ensure direct loans are being reconciled in a timely manner. The District Finance department, rather than the former structure of academic affairs and student success department oversight, now oversees this aspect of decentralized Financial Aid, being proactive in reviewing the reconciliations to ensure the accuracy of the data for the Direct Loan. The District will train the staff to effectively and efficiently understand and reconcile the Direct Loan records, as noted in the FCMAT accreditation files in November 2019 ([6-03](#)) and May 2020 ([6-04](#)).

The District continues to inform staff of procedures relative to internal controls in the areas of reconciliation monthly closing, as in the District announcement (6-05). The finance department has continued to hire sufficient staff to adhere to separation of accounting duties and functions, as noted in the department contacts (6-06).

7) Establishing strategies to improve the management of the OPEB debt

The District is solely responsible for management of OPEB. Part Two of the Special Report details the strategies that the District has established.

8) Providing an executive-level staff turnover analysis and recommendations to retain these staff at the District

Despite the transitions at the District level and the President position being vacated in early Summer 2020, the College is positioned to have all permanent President, Vice President and Dean positions filled by the end of Spring 2021. The table below shows the positions that have needed to be filled on and interim or acting basis, with a projected date for hire of the permanent positions, all of which are reflected in the current organizational chart (8-01). Following the dates below, the College will have all permanent administrative staff in place for the 2021-22 year, if not beforehand.

Permanent Position	Reason for vacancy	Interim/Acting Employee/Role	Expected Timeline to Hire Permanent Administrator
College President	Resignation (May 26, 2020)	Vice President of Instruction (Interim President)	November 2020
Vice President of Instruction (VPI)	Position Temporarily Vacated with VPI appointment as Interim President	Dean of Humanities, Social Sciences and Applied Technologies (Acting VPI)	Fall 2020 or when permanent Vice President of Instruction resumes role
Dean of Humanities, Social Sciences, and Applied Technologies (HSSAT)	Position Temporarily Vacated with Dean of HSSAT appointment as Acting VPI	Laney Faculty Member (Acting Dean of HSSAT)	Spring 2021 or when permanent Dean resumes role
Dean of Math & Sciences	Position Temporarily Vacated with re-assignment of permanent Dean to role of VPI at Merritt College	External Annuitant Retiree Hire (Acting Dean of Math & Sciences, Accreditation Liaison Officer)	Spring 2021 or when permanent dean completes interim VPI assignment at Merritt
Dean of Student Services	Resignation (July 17, 2020)	Associate Dean of Student Success (Interim Dean of Student Services)	Spring 2021

Table 9: Vacant Dean, Vice President and President Positions at Laney College in Fall 2020

Diversity, Equity and Inclusion Professional Development among Laney Administrators:

As the College moves forward, leadership realizes that at the executive management level, it needs to continue to foster and model professional development as it relates to Equity in the workplace. Given the diversity of the College’s management and executive management teams,

such professional development was identified as a priority in Summer and Fall 2020. Beginning in September, members of the Management Council (President, Executive Assistant to the President's Office, Deans, Associate Dean, Directors) committed to taking the Black Minds Matter course designed by San Diego State University's Center for Organizational Responsibility and Advancement, with a standing item of discussing the course during Fall 2020 regular meetings.

Among Executive Council members (President and Vice Presidents) evaluation and assessment in early Fall also resulted in the decision to have a similar standing item in their weekly meetings. Within its own circle, the Vice President of Student Services is facilitating a "book club" style discussion, beginning with Robin Di Angelo's *White Fragility*. As of November 1, the group had engaged in five discussions on the book and issues related to it ([8-02](#)).

The College's administrators are recognizing professional development in the area of Equity to promote a more inclusive workplace as well as one that resonates in its mission to provide an educational environment "rooted in Social Justice." To complement such efforts, the District has also addressed issues of turnover, and its response is found in Section Four of Part Two of the Special Report.

Summary of Part One

Laney College has engaged in substantive and explicit actions to ensure fiscal accountability, sustainability, and overall fiscal health in collaboration with the District's Finance Department. In response to each of the noted deficiencies from the January 27, 2020 letter, this Special Report highlighted specific actions taken and plans for moving forward that will clarify the College's work and actions, as well as those that have been addressed by the District. The evidence provided shows sufficient stability to address each of the findings that led to the decision of the Commission to place the College on probation.

Appendix of Evidence – Part 1: College Response

[1-01 CCCCCO Bdgt Acct Man 2012](#)

[1-02 LC SEM Plan 2019-2021](#)

[1-03 SEM Orig Goals Spring 2019](#)

[1-04 LC SEM Plan 2019-2021](#)

[1-05 CBT Fisc Imp Plan June 2019](#)

[1-06 PCCD FCMAT June 28 2019](#)

[1-07 SEM Add Goals Fall 2019](#)

[1-08 LC SEM Plan 2019-2021](#)

[1-09 Degrees Certificates](#)
[1-10 Enroll Mngmt Compdm 2019](#)
[1-11 Power BI Enrollment Data](#)
[1-12 Dept. Chairs Retreat 2019](#)
[1-13 Dept. Chairs Retreat 2020](#)
[1-14 LC Pathways Map](#)
[1-15 Scheduling Matrix](#)
[1-16 Modified Schedules FTES FTEF](#)
[1-17 Program Maps](#)
[1-17.a PCCD AP 4021](#)
[1-18 Student Swirl Data 2018](#)
[1-19 Modified Block Schedule](#)
[1-20 Block Schedule-Pre 2020-21](#)
[1-21 Modified Block Schedule](#)
[1-22 Student Swirl Data 2018](#)
[1-23 POST Scheduling Tool](#)
[1-24 CVC OEI Pathways video](#)
[1-25 Enrollment Management Plan](#)
[1-26 DE Plan 2019-21](#)
[1-27 Counseling Appt Online](#)
[1-28 Fin Aid Chat Online](#)
[1-29 Student Success Center](#)
[2-01 CCCCCO SCFF](#)
[2-02 Gov May Revise FF May 2018](#)
[2-03 Planning Retreat May 2019](#)
[2-04 Dept Chair Mtg SP19](#)
[2-05 PPCD Gems Dir Fin Aid](#)
[2-06 ACCJC FOLLOW UP FA](#)
[2-07 Fin Aid Sum Data 2018-19](#)
[2-08 Fin Aid Sum Data 2019 20](#)
[2-09 Cash4College Feb 2020](#)
[2-10 Fin Aid Chat](#)
[2-11 Fin Aid Videos](#)
[2-12 Fin Aid Academic Prog](#)
[2-13 Virtual Open House Aug 2020](#)
[2-14 PCCD Fin Aid Procd 2020-21](#)
[2-15 Course Success Retention](#)
[2-16 LC SEM Capstone Courses](#)
[2-17 Student Success Metrics](#)
[2-18 LC Catalog Transfers](#)
[2-19 Virtual Transf Day Oct 2020](#)
[3-01 Budget Train Presentations](#)
[3-02 Business Services SOP](#)

- 3-03 [Budget Train Presentations](#)
- 3-04 [Budget Train Presentations](#)
- 4-01 [Meas E Prop Alloc 2020-22](#)
- 4-02 [PCCD BP 6741](#)
- 4-03 [PCCD AP 6741](#)
- 5-01 [LC Org Chart 2020-21](#)
- 5-02 [LC Org Chart 2020-21](#)
- 5-03 [BOT Agenda 9 15 2020](#)
- 6-01 [PCCD Int Audit 6 30 2019](#)
- 6-02 [Gov Info 34 CFR 685.300](#)
- 6-03 [FCMAT Self Asmt Nov 2019](#)
- 6-04 [FCMAT Self Asmt May 2020](#)
- 6-05 [PCCD Mthly Closing Anncmnt](#)
- 6-06 [PCCD Bus Services Contacts](#)
- 8-01 [Laney Org Chart](#)
- 8-02 [Exec Council Agenda 9 30 2020](#)

Part Two: Peralta Community College District Response



Introduction

In response to the Accrediting Commission for Community and Junior Colleges, (ACCJC or Commission) letters of January 25, 2019^[i] (January 2019 Letter), the Peralta Community College District (PCCD) Colleges were to inform the Commission on its actions relative to the following eight points:

1. Establishing FTES Targets and Enrollment Management Plans
2. Establishing a Student Success Infrastructure Plan to comply with the Student-Centered Funding Formula as announced by the California Community College Chancellor’s Office
3. Establishing guidelines to reduce operational overspending and eliminate the structural deficit
4. Adopting a Board policy to adopt sustainable fund balances and reserves
5. Adopting a restructuring plan to improve efficiencies and accountability at the District office and the Colleges
6. Addressing all audit findings
7. Establishing strategies to improve the management of the OPEB debt
8. Providing an executive-level staff turnover analysis and recommendations to retain these staff at the District

PCCD submitted a special report titled “*Peralta Community Colleges Integrated Financial Plan 2019-2024, A Living Document*”^[ii] to the Commission on December 2, 2019 (PCCD 2019 Special Report). The purpose of the PCCD 2019 Special Report was to address the eight points noted in the January 25, 2019 Commission letter to Merritt College, Berkeley City College, Laney College, and College of Alameda (Colleges). In response to the PCCD 2019 Special Report, the Commission issued letters to each of the Colleges on January 27, 2020, imposing probation on them.^[iii]

The January 27, 2020, ACCJC letter stated the Commission found the PCCD 2019 Special Report had six deficiencies and findings (Six Deficiencies):

“It is not evident from the special report that the College/District has addressed foundational issues which have bearing on its fiscal health; this includes:

1. A continued structural deficit
2. Lack of adherence to Board policies and administrative procedures
3. Deficiency in reconciliation and financial control issues

4. Key staffing issues
5. Its OPEB obligations
6. Ongoing unaddressed audit findings.”

Additionally, the January 27, 2020 Commission letter to the Colleges stated:

- “In several areas of the Special Report, the College/District has responded with corrective intent, but no evidence was provided that corrective actions are being implemented to address the noted deficiencies.
- The special report lacks the organizational structure, clarity and specificity of content.”

Each of the Six Deficiencies are addressed here by providing evidence and brief statements of corrective actions that PCCD has taken to improve or remedy them. The structure of these responses is designed to refer to each of the Commission’s above statements of deficiency individually, and utilize a related standard from the [*ACCJC Guide to Institutional Self-Evaluation, Improvement, and Peer Review, January 2020 Edition*](#) as evidence of meeting the standard. It is also important to note that Item 7 in the January 2019 letter (Establishing strategies to improve the management of the OPEB debt) is addressed within the response in five of the six deficiencies.

1) A Continued Structural Deficit – ACCJC Standard III.D.2

Standard III.D.2: The institution’s mission and goals are the foundation for financial planning, and financial planning is integrated with and supports all institutional planning. The institution has policies and procedures to ensure sound financial practices and financial stability. Appropriate financial information is disseminated throughout the institution in a timely manner.

Evidence for compliance with Standard III.D.2 includes budgeted or planned fiscal expenditures that have supported or will support the achievement of institutional plans or goals; and minutes from any governance group when institutional planning and financial planning are connected or coordinated.

a. To show that PCCD has continued to address its financial strength, please refer to

PCCD’s FCMAT Initial Risk Assessment Ratings that have changed from indicating an extended financial risk from over 60%^[iv] to a stable FCMAT Risk Assessment Rating in May 2020 of less than 6%.^[v]

b. To show that PCCD’s net position has strengthened, please see the 2019 Audit Report.^[vi]

The issue is with the net position of the District’s finances. “The Statement of Revenues, Expenses, and Changes in Net Position presents the financial results of the District’s operations,

as well as its non-operating activities. The distinction between these two activities involves the concepts of exchange and non-exchange. Operating activities are those in which a direct payment or exchange is made for the receipt of specified goods or services. For example, student payment of tuition fees is considered an exchange for instructional services. The receipt of state apportionments and property taxes, however, does not include this exchange relationship between the payment and receipt of specified goods or services. These revenues and related expenses are classified as non-operating activities. *It is because of the methodology used to categorize between operating and non-operating, combined with the fact that the primary source of funding that supports the District's instructional activities comes from State apportionment and local property taxes, results in a net operating loss for the District's operations* [italics added], p. 9.”

- c. To demonstrate PCCD's adherence to participatory governance, please see the evidence from participatory governance groups that engage in evaluating PCCD's financial health. [\[vii\]](#), [\[viii\]](#)
- d. To demonstrate PCCD's attention to its long-term health and viability, the Board of Trustees adopted an update to the Five Year Integrated Financial Plan on November 12, 2019. [\[ix\]](#)
- e. To demonstrate the change from 2019/20 Adopted Budget, which used funds from the ending fund balance, [\[x\]](#) the Adopted Tentative Budget for 2020/2021 presented a balanced budget. [\[xi\]](#) Because of the COVID-19 pandemic, the State Chancellor's Office issued Executive Order 2020-06 [\[xii\]](#) to allow for Districts to adopt the final budget by October 30, 2020. A draft of the Fiscal Year 2020-2021 Adopted Budget was shared with the Board of Trustees on September 15, 2020 as a first reading. [\[xiii\]](#) The Final Draft of the Adopted Budget was shared with the Board of Trustees for a second reading on October 13, 2020 and was presented for their approval on October 27, 2020. [\[xiv\]](#)
- f. Understanding that the District operates in a COVID-19 Pandemic environment as well as in one that is macroeconomically situated in shifting demographic patterns for College attendance, the District has contracted with Cambridge West Partnerships [\[xv\]](#) to assist with data integrity and systems in support of the Student Centered Funding Formula metrics and in planning to avoid negative consequences of the end of the hold harmless provision. [\[xvi\]](#)
- g. The District has an outdated budget allocation model that needs to be revised. This model will be part of the work of the various participatory governance groups over the academic year, with an eye toward revising the structure of the governance process, and, recommending a revised the budget allocation model to the chancellor. [\[xvii\]](#)
- h. The human resources department is in negotiations with the collective bargaining units to consider an early retirement program. If accepted, the program would begin in late 2020 and into 2021.
- i. The District has effectively continued to closely align the full-time faculty hired with the Faculty Obligation Number from the State Chancellor's Office (with consideration of the total FTES and productivity targets).

- j. Enrollment management procedures will include using quantifiable data and calculations to align productivity with FTES and will take into consideration all faculty on special assignment and sabbatical).[\[xviii\]](#), [\[xviii.a\]](#)

2) Lack of Adherence to Board Policies and Administrative Procedures – ACCJC Standard III.D.3

Standard III.D.3: The institution clearly defines and follows its guidelines and processes for financial planning and budget development, with all constituencies having appropriate opportunities to participate in the development of institutional plans and budgets.

Evidence for Standard III.D.3 includes: procedures that define guidelines and processes for financial planning and budget development; minutes from finance or budget committee meetings verifying that established financial planning and budget development processes are followed; roster of a finance or budget committee; documented budget development process that identifies responsible parties for steps in the planning process and that identifies opportunities for input from constituencies; a documented timeline of institutional planning coordinated with the budget development process, including reporting deadlines for various types of reports to or reviews with different audiences.

- a. To demonstrate PCCD’s adoption of Board policies and administrative procedures relative to financial planning, please see Board and Administrative 2410 Policy Development.[\[xix\]](#)
- b. To demonstrate PCCD’s regular adherence to Board policies and processes for integrated planning and budget development, please see the planning and budget calendar[\[xx\]](#) and the Board approved budget development calendar[\[xxi\]](#) and minutes and agendas from the Planning and Budget Council, and the Planning, Budget and Integrated Model agenda and calendars.[\[xxii\]](#)

3) Deficiency in Reconciliation and Financial Control Issues – ACCJC Standard III.D.5

Standard III.D.5: To assure the financial integrity of the institution and responsible use of its financial resources, the internal control structure has appropriate control mechanisms and widely disseminates dependable and timely information for sound financial decision making. The institution regularly evaluates its financial management practices and uses the results to improve internal control systems.

Evidence for compliance with Standard III.D.5 includes: policies or procedures for internal control mechanisms; policies or procedures for purchasing; budgets, financial reports, audit reports presented to the campus and to the Board; reports of decisions for financing or allocation of resources presented to the campus community or constituent groups; monthly, quarterly, or other reports of revenues and expenditures

- a. To demonstrate PCCD’s sufficiency in reconciliation and financial control issues, the District hired a full-time employee as Internal Auditor in April 2020.[\[xxiii\]](#)
- b. The District continues to enforce internal controls through its technology applications and contracted with Oracle to complete a comprehensive system upgrade at the May 29, 2020 – Special Meeting of the Board of Trustees.[\[xxiv\]](#)
- c. To demonstrate PCCD’s public presentation of financial reports, please see cash flow and budget to variance reports presented to the Board of Trustees on May 26, 2020 and July 28, 2020.[\[xxv\]](#) The finance department will present financial statements to the Board quarterly.
- d. PCCD’s Audit Reports are readily available and demonstrate financial controls.[\[xxvi\]](#)
- e. PCCD’s policies and procedures for internal closing and control mechanisms have been disseminated and applied.[\[xxvii\]](#) However, the District will need to make changes to ensure there are adequate controls to Financial Aid. For the current fiscal year, we expect to have a repeat audit finding for internal control in this area. The District lacks a formal review process regarding student loan reconciliation, review of student selection for awards packages, and the COD versus the student information system. Two actions have been taken to address this finding. One is to immediately have the financial aid reporting structure be moved to the Finance and Administration area, effective October 16, 2020, and the second is to recommend the Board of Trustees form an Audit and Finance Subcommittee.

4) Key Staffing Issues – ACCJC Standard IV.B.2

Standard IV.B.2: The CEO plans, oversees, and evaluates an administrative structure organized and staffed to reflect the institution’s purposes, size, and complexity. The CEO delegates authority to administrators and others consistent with their responsibilities, as appropriate.

Evidence for compliance with Standard IV.B.2 includes policies that outline CEO responsibilities, organizational charts, and policies and procedures that provide for the delegation of authority from the CEO to administrators and others.

- To demonstrate evidence of addressing key staffing issues, in May 2020 the District produced an updated District Organizational Chart[\[xxviii\]](#) that demonstrates key positions have been filled. These included those of full-time permanent Chancellor, Vice Chancellor of Finance

and Administration, Vice Chancellor of General Services, an Internal Auditor, and a Director of Purchasing. [xxix] However, on July 16, 2020, the then permanent CEO submitted her resignation; on July 18, 2020 the Board of Trustees accepted her resignation, and utilized the following delegation of authority policies and procedures:

1. Chancellor Succession, the District has Board Policy 2432. [xxx]
2. For delegation of authority, the District has Administrative Procedure 2430 which outlines delegation of authority to the chancellor's staff, [xxxi] and Administrative Procedure 6100 which delegates authority for business and fiscal affairs. [xxxii] These together outline the delegation of authority and roles and responsibilities of each of the designees.
3. With these in place, the passage of the authority from the former CEO to the Vice Chancellor of Finance and Administration was seamless and indicated the District and Board's ability to continue operations. An open recruitment for an interim chancellor was completed October 1, 2020.
4. Prior to the former chancellor submitting her resignation, two new presidents were hired at Berkeley City College and Merritt College, and the two presidents at Laney College and College of Alameda accepted positions at other institutions. The District was able to appoint interim presidents from within the administrative organization at each of the Colleges. The recruitment for two presidents for these Colleges is in the final stages and we expect to have them seated by December 1, 2020.

Though these have been accomplished, the District is developing plans to hire and retain employees that include effective equity and diversity considerations through professional development. The District has not implemented a turnover analysis mechanism. These will be forthcoming at some point in the future.

5) OPEB Obligations – ACCJC Standard III.D.12

Standard III.D.12: The institution plans for and allocates appropriate resources for the payment of liabilities and future obligations, including Other Post-Employment Benefits (OPEB), compensated absences, and other employee related obligations. The actuarial plan to determine Other Post-Employment Benefits (OPEB) is current and prepared as required by appropriate accounting standards.

Evidence for compliance with Standard III.D.12 includes documents that demonstrate the institution is aligned with this Standard.

The District offers its employees Other Post Employee Benefits (OPEB) in the form of retiree health benefits pursuant to contractual commitments set forth in its collective bargaining agreements. To provide funds to pay the costs of these benefits, the District issued its 2005 OPEB Bonds. This section of the District's response addresses the seventh of eight points raised

by ACCJC in the January 2019 Letter, “Establishing Strategies to Improve the Management of OPEB Debt.”

The purpose of this section is to discuss the plan of finance for the District’s OPEB Bond Program. We start with an overview of the liabilities and uses of the OPEB Bond Program, discuss the application of funds, and address the FCMAT report’s recommendations. Here the response to the Commission is detailed and includes an overview of the program.

The District has identified its outstanding OPEB Bond Program liabilities as follows:

- Debt Service, including principal, interest, interest rate swaps, and ancillary fees associated with its outstanding OPEB Bonds.
- Retiree health benefits for District employees hired prior to July 1, 2004 (“Pre-2004 Employees”)

The District has identified the following sources of funds for the payment of its OPEB Debt:

- Dedicated General Fund Appropriation (also known as the “OPEB Charge”) and OPEB Special Reserve Fund (“Fund 69”)
- Supplemental Unrestricted General Fund Appropriation, starting at \$4.3 million for FY2019-20, to increase by \$1 million annually
- Retiree Health Benefit Trust (“Trust I” or “Fund 94”)

The 2020-21 adopted final budget included a financial plan for the OPEB Bond Program. The following table summarizes the FY 2020-21 budget for debt service and fees for the OPEB Bond Program.

Source	Amount
Dedicated Appropriation	\$6.5 million
Supplemental Appropriation*	\$2.1 million
Fund 69 Balance	\$2.8 million
Trust I	\$5.3 million
Total	\$16.7 million

Table 10: FY 2020-21 Debt Service Budget, Fees for OPEB Bond Program

* Due to the deferrals from the State, the District’s budget for the supplemental appropriation from the District’s general fund was reduced from \$5.3 million to \$2.1 million for FY2020-21.

District General Fund

The District maintains budgetary capacity for the Dedicated OPEB Contribution, and the Supplemental Appropriation as planned. In FY2021-22, the combined Dedicated OPEB Contribution and Supplemental Appropriation will total \$9.6 million. This number is projected to increase annually at the aforementioned \$1 million rate until FY2031-32, when the combined total is an estimated \$19.6 million. The highest anticipated combined total of the Dedicated OPEB Contribution and Supplemental Appropriation is \$25.8 million in FY2049-50, which is the final year of the OPEB Bond Program.

OPEB Special Reserve Fund

The projected fund balance of \$10.9 million in the fund on June 30, 2021. Starting in FY 2021-22, there are no anticipated draws on the OPEB Special Reserve Fund in the plan of finance.

Trust I

Trust I was established in 2005 to reimburse the District for costs of benefits for Pre-2004 Employees. Trust Fund I contained assets of \$204.5 million as of June 30, 2020 and had an Actuarial Accrued Liability of \$147.7 million as of June 30, 2019 (using a discount rate of 6.3%). With the draw of \$5.3 million in August 2020, there is an estimated surplus of \$50.9 million (134% funding level) in Trust I as of June 30, 2020.[\[xxxiii\]](#) There is no plan at this time for the District to contribute any additional funds to Trust I.

\$62.4 million Fund Balance for Contingency in OPEB Bond Program

The District's combined dedicated liquidity for the OPEB Bond Program includes the \$50.8 million surplus in Trust I and the \$10.9 million balance in the OPEB Special Reserve Fund, for a total of \$62.4 million.

The OPEB Special Reserve Fund will only be used for liabilities in the OPEB Bond Program should sources become unavailable.

Restructuring

Much of the debt associated with the District's OPEB Bond Program is non-callable[\[xxxiv\]](#) or is subject to a "make-whole."[\[xxxv\]](#) As such, the District has limited options to reduce interest costs through a refinancing. Only the District's outstanding B-3 Bonds (\$43,175,000) are subject to call at any time at par.

Through the creation of the plan of finance for the OPEB Bond Program, the District has addressed several of the recommendations by FCMAT, as follows:

Audit annual enrollment eligibility in the OPEB program (In Progress)

The District's last audit for retiree health benefits was in 2016. The District does biennial checks on eligible dependents. In addition, the District proactively verifies deaths through ancestry.com. The District has a goal of finalizing and institutionalizing an annual enrollment eligibility process in 2021.

Conduct an annual OPEB actuarial study

The District's actuarial Total Compensation Systems completed an Actuarial Study of Retiree Health Liabilities as of July 1, 2018" dated March 14, 2020.[\[xxxvi\]](#) In addition, the Board of Trustees approved Resolution No. 19/20-44 at its meeting on April 7, 2020[\[xxxvii\]](#) which included a statement of the District's intention to "annually obtain an actuarial valuation of retiree health liabilities prepared in compliance with the Governmental Accounting Standards Board Rule 74/75."

Ensure that the governing Board approves the annual OPEB actuarial study. (Complete)

As mentioned above, the Board of Trustees approved Resolution No. 19/20-44 at its meeting on April 7, 2020. The Board of Trustees approved two actuarial reports, the "Actuarial Study of Retiree Health Liabilities Under GASB 74/75, Roll-forward Valuation, Valuation Date: June 30, 2018, Measurement Date: June 30, 2019" dated February 28, 2020, prepared by Total Compensation Systems, Inc. and "Actuarial Study of Retiree Health Liabilities As of July 1, 2018" dated March 14, 2020, prepared by Total Compensation Systems, Inc. The Resolution also provided a process whereby the District will present this information to the Board on an annual basis.

Request the actuarial to perform a separate OPEB funding valuation at the estimated rate rather than the long-term return on employee assets, so it has a more realistic liability number for the pre-2004 amount. (Complete)

The District had an “Actuarial Study of Retiree Health Liabilities as of July 1, 2018” dated March 14, 2020 and prepared by its actuary, Total Compensation Systems, Inc. An actuarial report was rolled forward to the fiscal year ending June 30, 2019, at a discount rate of 6.3%. In the economic assumptions used by Total Compensation Systems, Inc., the 6.3% “is based on assumed long-term return on plan assets.” Consistent with Resolution 19/20-44, the District will request the actuarial to perform such a valuation on an ongoing basis.

Reconsider the current goal of fully funding the OPEB liability. (Complete)

The Board of Trustees approved the 2020-21 Final Adoption Budget at its meeting on October 27, 2020.[\[xxxviii\]](#) The plan of finance for the OPEB Bond Program assumes that the OPEB Trust Fund is a source of funds for the District’s OPEB Bond Program and to prepay bond principal if a surplus is determined to exist in accordance with Board policy. The District is not currently planning to make any additional deposits into the OPEB Trust Fund.

Consider eliminating annual general fund payments to the OPEB trust funds since they are fully funded at this time. (Complete)

The Board of Trustees approved the 2020-21 Final Approved Budget at its meeting on October 27, 2020. A plan of finance for the OPEB Bond Program was incorporated in the budget. No funds were allocated to the OPEB Trust Fund from the District’s general fund. The current plan of finance does not provide for any annual general fund payments into the OPEB trust fund in the future.

Consider renegotiating (i.e. ending) retiree health benefits for new employees. (Under Consideration)

The District’s contracts with the Peralta Federation of Teachers, Local SEIU 1021, and IUOE Local 39 expire on June 30, 2022. The District will consider future benefit changes in conjunction with future labor negotiations; however, the District has no immediate plans to change its current retiree benefit plans. The District is engaged with its benefits consultant to look at a variety of options for balancing value with costs saving measures.

Terminate and restructure some of the more volatile bonds. (Complete)

The Board of Trustees approved Resolution No. 19/20-56 on May 26, 2020, authorizing the amendment of the 2005 Indenture of Trust and other documents in relation to the conversion of the 2005 Series B-3 Bonds from Convertible Auction Rate Securities to variable rate demand bonds supported by a letter of credit provided by Barclays Bank plc.[\[xxxix\]](#)

The Board of Trustees approved Resolution No. 19/20-65 on July 14, 2020, authorizing the reoffering circular.[\[xli\]](#)

On August 5, 2020, the District closed the conversion of the 2005 Series B-3 Bonds. The B-3 Bonds have a final maturity on August 5, 2025. The letter of credit that was provided by Barclay’s bank is the full term of the bonds.[\[xli\]](#) The reoffering circular describes the letter of credit and current outstanding debt service on the District’s OPEB Bonds.[\[xlii\]](#)

The remaining 2005 Series B-4, 2005 Series B-5, and 2005 Series B-6 Bonds are non-callable prior to the full accretion date of each series of bonds (2025, 2031, and 2039 respectively).

These bonds are currently accreting at a fixed rate. These bonds cannot be refinanced or restructured using fixed-rate bonds in the current market for debt service savings. The 2011 Refunding Bonds and the 2006 modified bonds are subject to a make-whole call and pay interest semi-annually at a fixed rate. These bonds cannot be refinanced or restructured using fixed-rate bonds in the current market for debt service savings. [\[xliii\]](#)

Contract for an addendum to KNN’s 2011 report [\[xliv\]](#) that would include an update of actions taken by the District to date related to its OPEB bond program since the 2011 report was published. (Complete)

KNN no longer provides services to the District. However, the Board of Trustees received a presentation on July 23, 2019, [\[xlv\]](#) which updated the District on the actions taken. It next approved a contract amendment with Backstrom McCarley Berry & Co., LLC (Backstrom Finance Team) at its meeting on September 24, 2019, [\[xlvi\]](#) to serve as its municipal advisor in connection with the OPEB Bond Program. The Backstrom Finance Team has and will continue to provide to the District and the Board updates and summaries relating to the status of the financings connected to the OPEB Bond program.

Through the implementation of the recommendations by FCMAT and the creation of the plan of finance for the OPEB Bond program, the District has improved its management of its OPEB Bond Program and increased its financial sustainability. The table below summarizes the key features of the plan of finance as compared to past practices.

	2005 – 2014	2015-2019	2020
2005 Bond Debt Service	Refinanced 2006-08 to mature through 2049 Refinanced 2009-15 to mature through 2031	Paid debt service as scheduled	Paid debt service as scheduled
OPEB Charge	Established in 2011, deposited to Trust I	Partially deposited to Trust I and partially used for Bond Program Liabilities	Used for Bond Program Liabilities
Quarterly Board Swap Report	None.	None.	Approved by Board Resolution
Actuarial Reports	Biannually	Produced separate Pre/post-2004 reports, biannually	Annually to be approved by Board Resolution

Table 11: Past v. Present Finance Practices, Peralta Community College District

The District continues to provide retirees who were hired prior to July 1, 2004, with lifetime medical benefits. For employees hired after July 1, 2004, medical benefits upon retirement are provided until age 65 or Medicare eligibility under a different structure of a self-managed trust.

6) Ongoing Unaddressed Audit Findings – ACCJC Standard III.D.7

Standard III.D.7: Institutional responses to external audit findings are comprehensive, timely, and communicated appropriately.

Supporting evidence of meeting the standard for Standard IIID 7 includes; minutes of meetings when audits and findings are discussed, and responses are planned; minutes of meetings where the reports are disseminated. When the District receives an audit finding, it takes steps to respond in a timely manner, as demonstrated by the 2018 Audit Corrective Action plan.[\[xlvii\]](#)

One of the ways that the District is ensuring the audit findings are addressed and permanently remedied is through the controls provided with the Oracle project, and those mentioned earlier in the appendix. The Oracle contract was approved on May 29, 2020, by the Board of Trustees and is in the process of implementation, which is scheduled to be “live” in the winter and spring of 2021.[\[xlviii\]](#)

As of this writing, the current audit for the District is underway. The audit process is not yet complete. However, in accordance with the California Community College State Chancellor’s Executive Order 2020-06 dated May 13, 2020.[\[xlix\]](#) Specifically, “... the requirement that each district submit an audit report to the Chancellor by December 31, 2020, is temporarily suspended until February 28, 2021,” due to COVID 19 pandemic. The 2019 audit report has provided an “unqualified opinion.” However, the District is in the process of evaluating preliminary findings:

<u>Vice Chancellor of Human Resources and Employee Relations</u>			
Financial Statement	2019-004	Vacation Accrual	
<u>Directors of Financial Aid, VC of AA, and VC Finance</u>			
Federal Awards	2019-005	SPECIAL TESTS AND PROVISIONS - RETURN TO TITLE IV	
Federal Awards	2019-006	SPECIAL TESTS AND PROVISIONS - DIRECT LOAN RECONCILIATIONS	
<u>Vice Chancellor of Academic Affairs and Student Success</u>			
Federal Awards	2019-007	COMMON ORIGATION AND DISBURSEMENT (COD) REPORTING	
State Awards	2019-008	444 - APPRENTICESHIP RELATED AND SUPPLEMENTAL INSTRUCTION (RSI) FUNDS	
State Awards	2019-009	425-RESIDENCY DETERMINATION FOR CREDIT COURSES	

Table 12: District Preliminary Audit Findings (as of October 29, 2020)

For the current fiscal year, the District has implemented a change to the management vacation policy limiting accruals and disallowing vacation payouts. The financial aid findings are repeated audit findings for internal control. The District lacks a formal review process regarding student loan reconciliation, review of student selection for awards packages, and the COD versus the student information system. The District has a decentralized financial aid structure with the District overseeing aspects of COD reconciliations. However, the financial aid processes under District oversight have been moved to the Finance and Administration area, from the Academic Affairs and Student Success area, effective October 16, 2020. Each of the colleges is addressing their findings by planning for extensive professional development and oversight of the financial aid areas by the vice presidents of student services. State Awards findings are being investigated and a plan for elimination or addressing them is being developed through the District’s Office of Academic Affairs and Student Success.

The District continues to inform staff of procedures and policies relative to internal controls in the areas of reconciliation of monthly closing[\[1\]](#), and the Finance Department has hired sufficient staff to adhere to separation of accounting duties and functions.[\[1\]](#) However, more still remains to be done to ensure that separation of duties and timely responses to reporting and student financial aid matters need to be addressed. To that end, the District is developing a plan that would implement a reporting structure aimed at ensuring that all financial aid matters are handled timely and with appropriate oversight by adequate numbers of skilled and professionally developed individuals and that the entirety of the operation reports to Finance and Administration.

- a. PCCD adheres to its Board Policy, 6400 Financial Audits.[\[lii\]](#)
- b. Aside from the Oracle upgrade mentioned above, the internal technology systems specific to Finance and Accounting have been upgraded to allow for internal controls, and system access is granted by employee role. Access to fund transfers is limited to employee role and within particular accounting areas. Required adherence to administrative and Board policies regarding expenditures, contracts, and purchase orders is being driven into goals and performance requirements for employees. And now, with key positions filled, and the technology system is set to be upgraded in fiscal year 2020/21, with an estimated completion and migration time of February 2021.[\[liii\]](#) The upgrade will include finance modules, position control modules, student financial aid, and student accounts receivables integration.

Appendix of Evidence – Part 2: District Response

- 1 [ACCJC Rep Letter Jan 2020](#)
- 2 [PCCD Intg Fin Plan 2091-24](#)
- 3 [ACCJC Action Letter Jan 2020](#)
- 4 [FCMAT Self Asmt Nov 2019](#)
- 5 [FCMAT Self Asmt May 2020](#)
- 6 [PCCD Annu Fisc Rep 6 30 2019](#)
- 7 [PBC Draft Minutes March 8 2019](#)
- 8 [PBC Resolutions April 23 2019](#)
- 9 [BOT Agenda Nov 12 2019](#)
- 10 [PCCD Adopted Budget 2019-20](#)
- 11 [PCCD Adpt Tent Budg 2019-20](#)
- 12 [CCCCO Exec Order 2020-06](#)
- 13 [PCCD Draft Adopted Budget 2020-21](#)
- 14 [PCCD Adopt Budget 2020-21](#)
- 15 [CWP LLC ICC Services](#)
- 16 [SCFF Alloc Model Oct 2020](#)
- 17 [PGC Minutes 1 31 2020](#)
- 18 [FTES AssocModel 2018-19](#)
- 18.a [ICC CWP for SCFF](#)
- 19 [PCCD BP 2410 AP 2410](#)
- 20 [PCCD Plan Budg Cal 2019-20](#)
- 21 [BOT Agenda Jan 21 2020](#)
- 22 [PBIM Home Agenda Mins](#)
- 23 [PCCD Internal Audit home](#)
- 24 [BOT Agenda 5 29 20](#)
- 25 [PCCD CashFlow Vari Repts](#)
- 26 [PCCD Annu Fisc Rep 6 30 2019](#)
- 27 [PCCD Closing Directives](#)

- 28 [PCCD Org Chart 10 19 20](#)
- 29 [PCCD Org Chart 9 2020](#)
- 30 [PCCD BP 2432](#)
- 31 [PCCD AP 2430](#)
- 32 [PCCD AP 6100](#)
- 33 [PCCD Trust II 6 30 2020](#)
- 34 [2011 Refunding OS](#)
- 35 [2011 Refunding OS Opt Redem](#)
- 36 [PCCD Act 2018 Study Retirees](#)
- 37 [BOT Resoution 19 20-4438](#)
- 38 [PCCD Adopt Budget 2020-21](#)
- 39 [Reimburse Agrmt 8 5 2020](#)
- 40 [BOT Resoution 19 20-65](#)
- 41 [Letter of Credit 8 5 2020](#)
- 42 [Reoffering Circular](#)
- 43 [2011 Refunding OS Opt Redem](#)
- 44 [PCCD OPEB Fin Rep 6 28 2011](#)
- 45 [PCCD OPED Pres 7 23 2019](#)
- 46 [BOT Agenda 9 24 2019](#)
- 47 [Corr Action Plan 6 30 2018](#)
- 48 [BOT Agenda 5 29 20](#)
- 49 [CCCCO EO Covid19 5 13 20](#)
- 50 [PCCD Mthly Closing Annemnt](#)
- 51 [PCCD Fin Admin Contact List](#)
- 52 [PCCD BP 6400](#)
- 53 [Oracle Dashbrd Pres 9 29 20](#)