



**Accreditation Follow-Up Report Summary
March 2016 Comprehensive Visit
Los Angeles Harbor College**

| Recommendation for Compliance | Related Standard(s) | Action Taken to Address Recommendation | Status of Action (Completed / In Progress)? |
|--------------------------------------|----------------------------|---|--|
| N/A | | | |

Current and Future Accreditation Challenges

In response to the 2016 Self-Evaluation, Harbor College determined that improvements made in three areas would increase institutional effectiveness: 1) infuse “systems” principles into the assessment and planning process, 2) strengthen collaboration between Academic Affairs and Student Services, and 3) formalize College wide communications. These three Quality Focus Essay Action Projects address the recommendations for improvement Harbor College received. Through the plans and activities outlined in the Quality Focus Essay Action Projects, the three areas outlined above will see significant improvements.

While many of the action steps and activities are currently in place, the challenge is to make more progress more quickly and maintain the Action Project schedule, delineated by year (Years 1, 2, and 3). A factor behind this challenge is that the long-time faculty Accreditation Coordinator retired, and the College selected two new coordinators who will start in fall 2017. Overcoming the learning curve for the new coordinators, including training in ACCJC standards and in the short- and long-term College goals pertaining to accreditation, is essential for the College to realize effective progress on the Quality Focus Essay Action Projects.



Los Angeles Harbor College

Follow-Up Report

Submitted by:

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Wilmington, CA 90744

Submitted to:

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

Date Submitted:

October 2017



Follow-Up Report Certification

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

From: Dr. Otto Lee, President
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Wilmington, CA 90744

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

Dr. Otto Lee, Chief Executive Officer _____

Sydney K. Kamlager President, Board of Trustees _____

Dr. Francisco Rodriguez, Chancellor _____

Dr. Bobbi Villalobos, Vice President, Academic Affairs _____
Accreditation Liaison Officer

Dr. Luis Dorado, Vice President, Student Services _____

Robert Suppelsa, Vice President, Administrative Services _____

Van Chaney, President, Academic Senate _____

Wheanokquea Gilliam, Classified Representative _____

Associated Student Body President _____

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Report Preparation

The Los Angeles Community College District takes an integrated approach to accreditation. While each college has its own governance processes for addressing accreditation, all colleges participate in addressing District accreditation recommendations and in ensuring that the District meets all accreditation standards. The main venue for discussing accreditation issues is the District Accreditation Committee. The District Accreditation Committee is comprised of the college Accreditation Liaison Officers, the college faculty accreditation leads, a college president, and representatives from the Educational Services Center (D0.1_Accreditation Committee Charge). Following the comprehensive site visits, the committee met to review the possible college and District recommendations and to develop a plan for addressing each recommendation.

The committee met over the past year and reviewed progress made on the recommendations. The progress was further communicated to the Board of Trustees through the Institutional Effectiveness and Student Success Committee (D0.2 Accreditation Response Plan; D0.3 LACCD Accreditation summary; D0.4 IESS District Accreditation Update). The report addressing the District recommendations were drafted by the leads in each area at the Educational Services Center from Human Resources, Information Technology, Educational Programs and Institutional Effectiveness, the Office of General Counsel, and Finance and Resource Development. The area lead responses were compiled and written in one voice by the division of Educational Programs and Institutional Effectiveness and provided to the District Accreditation Committee for approval (D0.5 DAC Agenda 5-9-2017).

The final District responses were provided to each college for review and approval through the college governance processes. Each college completed the report by adding the responses to college-specific recommendations and augmenting the District response to reflect the college implementation of district-wide actions. The complete and appended reports were approved through the college approval processes. (Meeting minutes)

Harbor College received no recommendations for compliance from the visiting team in spring 2016. The College members have reviewed the responses to the District recommendations for compliance at several meetings and discussed the implementation of new procedures at the College, as outlined in the responses.

Following the completion and approval of the college reports, the final content was edited and submitted to the District Office of Institutional Effectiveness. The responses to District and college recommendations were presented to the Board and Institutional Effectiveness and Student Success Committee on **DATES** (D0.6 IESS Agenda). The Board of Trustees reviewed and approved the nine college reports on September 6th, 2017 (D0.7 September Board Agenda). The final reports were provided to the ACCJC with all required signatures following Board approval. All report materials and evidence have been posted on the college and District websites.

District Recommendation 1 (Compliance): In order to meet the Standard, the team recommends that the District ensure consistent and uniform guidelines for the search and selection of adjunct faculty. (III.A.1)

The District has policies for hiring that are established in Board Rule Chapter X Article III (D1.1 Ch. X - Article III). The previous adjunct hiring process allowed for the development of local processes that were not consistent across all colleges. Following the ACCJC's comprehensive visit, the District Academic Senate (DAS), working with the District's Human Resources Division and Chancellor as representatives of the governing board, jointly agreed to a uniform hiring procedure for all adjunct positions. The District Academic Senate approved the hiring process on May 11, 2017. (D1.2 May 2017 DAS Agenda; D1.3 Adjunct Recruitment Process). Other participatory governance groups were consulted as well. The revised adjunct hiring process was included in the HR Guide (D1.4 HR GUIDE) which was approved and signed by the Chancellor and District Academic Senate President on DATE. Based on the new process, an FAQ was developed to assist colleges in implementation (D1.5 FAQ Adjunct Hiring Process).

As part of the new process, a centralized web-based adjunct recruitment system of applicant lists by discipline was developed and is maintained by the District Human Resources Division for dissemination to the colleges and other district hiring locations (D1.6 Recruitment Portal). The revised process includes a hiring selection committee with an Equal Employment Opportunity officer, for screening and interviewing applicants. The Human Resources Division also developed templates for posting adjunct positions (D1.7 Example Template PT HEALTH (DR-1)). The templates include duty statements, minimum qualifications, and application processes and are accompanied by a style guide to ensure conformity in the appearance of postings. The new process provides consistency for the recruitment and selection of adjunct faculty with the goal of ensuring a diverse and highly qualified lists of applicants. All hiring processes throughout the district are confidential, and all evidence for this section has been de-identified to protect that confidentiality.

The new process was implemented for adjuncts hired for fall 2017. The online application portal includes requests from every college for disciplines in need of adjunct faculty (D1.8 List of Disciplines Posted). The Human Resources Division validated adjunct hiring lists and distributed the lists to department chairs throughout the spring and summer semesters (D1.9 Example Email to Colleges; D1.10 Example De-identified applicant list). Selection committees reviewed the lists through the online portal to determine which candidates to offer interviews (D1.11 Process for Reviewing Applicants). All interviews were conducted as defined in the adjunct hiring process and included faculty and EEO membership. The uniform guidelines were used in the hiring of all new adjuncts for fall (D1.12 New Adjunct Hiring List to date)

At Human Resources and Budget meetings, and at Division Council and Academic Senate meetings, Harbor College reviewed the new District process for hiring adjunct faculty and agreed to College procedures that align with the new District guidelines. The College is currently participating in the new District adjunct hiring process and has completed adjunct hirings using the new procedures for three adjunct pools for hires.

District Recommendation 2 (Compliance): In order to meet the Standard, the team recommends that the District ensure all personnel are systematically evaluated at stated intervals in accordance with the bargaining agreements and Board policies. (III.A.5)

Following the site visit, the Human Resource Division began an analysis of the current evaluation tracking processes. It found that the process did not include the ability to upload the evaluation as a digital record, which left a gap in the tracking mechanism. Additionally, the District enterprise system, SAP, did not include academic personnel as part of the evaluation tracking. This led to paper records that were sometimes incongruent with the SAP system and two separate means of tracking evaluations. The impact was District records that sometimes reflected fewer completed evaluations than college records.

The District has completed an update of the SAP system to enhance tracking and congruence in the evaluation process. The system is now used for all personnel, classified, and academic employees as the system of record for evaluations. In addition, the system has been updated to include the ability to upload the evaluation (D2.1 Evaluation Alert System User 3.0 Manual; D2.2 LACCD_EASYenhancementsrelease - 3.0). The digitizing of evaluation forms ensures that all official records are in agreement and that the SAP system can serve as the official record. The SAP system can now track the percentage of evaluations that have been received and provide reports to managers to assist in completing all evaluations (D2.3 Evaluation Report). The system is programmed to track evaluations in accordance with the contractual guidelines in bargaining agreements. The system of submitting digital copies of evaluations for the official record and for tracking purposes went into effect for evaluations due January 1st, 2017 moving forward. This process will capture all evaluations as they are due.

All Colleges have implemented the evaluation process developed in the SAP system. As of DATE, the District has evaluated X % of employees in accordance with the stated intervals.

District Recommendation 3 (Compliance): In order to meet the Standard, the team recommends that the District update the performance evaluations of academic administrators to include the results of the assessment of learning outcomes to improve teaching and learning. (III.A.6)

The Human Resource Division has worked with collective bargaining groups to add Student Learning Outcomes (SLO) and Service Area Outcomes (SAO) language to job descriptions, job duty statements, and evaluation forms. LACCD academic supervisors (Deans) operate under a collective bargaining agreement (D3.1 Local911_2014-17 Agreement). On **DATE**, the union and the District entered into a Memorandum of Understanding to include the results of the assessment of learning and/or service outcomes in the evaluation of all Deans (D3.2 Signed Teamster MOU). The evaluation form was immediately put into practice (D3.3 Deans Evaluation with SLO Assessment).

All unrepresented management and executive level administrators have also had SLO and/or SAO assessment integrated into the evaluation process. The revised evaluation forms ensure that learning and/or service outcomes are a component of the evaluation process (D3.4 Basic Other Academic Administrator; D3.5 FORM HR E-210C LACCD Summary Evaluation of College President Academic Vice Chancellor).

Each college has implemented the new evaluation process for academic supervisors and managers. The process begins with common language in administrative job announcements that make clear the role of administrators in using learning and/or service outcomes to improve academic and service programs. All Colleges have used the revised job description for all new academic administrators (D3.6 Associate Dean, Strong Workforce; D3.7 Dean of Special Programs and Services). All colleges have evaluated current administrators based on the revised job duties and evaluation processes. This includes utilizing the revised evaluation form that mandates a review of the administrator's use of learning and/or service outcomes. All administrative evaluations are up to date and are available in the personnel files for review.

District Recommendation 4 (Compliance): In order to meet the Standard, the team recommends that the District and colleges develop a comprehensive Business Continuity/Disaster Recovery plan to ensure reliable access, safety, and security. (III.C.3)

The visiting team indicated that the District and the colleges share responsibility for technology resources and that this led to situations in which technology resources and planning were inconsistent across the colleges. As an example, the team noted that while the District Office has onsite and offsite backups, only some of the colleges had offsite backup systems. In addition, business continuity plans were inconsistent as were the technology resources needed to implement such plans. The District has worked to develop a comprehensive Business Continuity plan that is consistent across all colleges and for the District centralized functions. The plan utilizes the California Community College System Office Information Security Center Template as the framework for a robust disaster recovery process.

The plan was developed through the District Technology Committee constituted by all college IT managers and the District Chief Information Officer. Based on the state template and multiple district-wide technology assessments (D4.1 District Technology Assessment Summary, D4.2 CCCCIO Assessment), the committee refined the recommendations to fit the specific staffing, governance, and technology infrastructure of the District. The committee approved a district-wide business continuity and disaster recovery plan on July 14th, 2017 (D4.3 LACCD College and ESC IT Systems Backup and Disaster Recovery Standards and Procedures). The plan was codified in Administrative regulation B-37, which was approved by the Chancellor on DATE (D4.4 Administrative Regulation).

While the plan puts in place a consistent process for ensuring reliable access, safety, and security of district and college technology and data, the District has worked to further identify improvements in technology systems, hardware, and processes that will offer even further protection and continuity. As part of a district-wide technology project, the Board requested an assessment of college and district technology needs (D4.5 FMPOC 40J Technology Update) and the development of a Strategic Execution Plan (DD4.6 Strategic Execution Plan Timeline) that would improve technology systems such that all colleges are operating at the same standard. The plan included improvements of storage systems, firewall security, and servers that was used in the development of the business continuity and disaster recovery plan.

The completed technology assessment indicated a need for enhanced data storage processes. The Strategic Execution Plan included enhancement to data storage that would lead to segregated onsite storage, local offsite storage, and offsite emergency backups (D4.7 Backup Plan Update Presentation and Timeline). The District has already begun implementation of these improvements with the District and each college adopting a new segregated backup storage system that ensures that all data and systems have a backup separated from the general system. These storage systems bring all colleges up to the same standard for security, and training has been provided for college IT employees on the use of the systems (D4.8 Backup Strategy).

The second phase of the back-up plan includes the development of offsite backups for all colleges. The District has sought industry experts in the development of these planned upgrades.

As part of an overall technology assessment strategy, the District will be contracting with a consultant to conduct an evaluation of current IT policies and processes at the college and district level (D4.9 LACCD IT Infrastructure and Organization Assessment). This evaluation will include final recommendations for the use of offsite cloud or tape back-ups. The technology solution will be implemented uniformly across all colleges to add another layer of security.

The District also plans to enhance business continuity and minimize downtime through the purchase of additional servers that could be used as a cold site in the event of catastrophic event or as a warm site in the event of minor outages. These servers will allow the district to maintain enterprise functions in the event that the primary datacenter is inoperable. The purchase of these servers is included in the Strategic Execution Plan with funding identified. The technology assessment strategy noted above will assist the District in identifying the most appropriate location for the secondary site. Additionally, the District has already developed performance/product standards for servers (D4.10 Server Standards). The result of these actions will be uniform server functionality across the district and colleges and the ability to mobilize district resources in support of any college in the event of an emergency.

Through initial assessments it has been made clear that there is a need for a greater standardization related to IT systems. The technology assessment strategy will include an evaluation of current IT organizational structure, policies, processes, and staffing at the college and district-level. This evaluation will be used to determine what additional policies, regulations, and processes should be adopted to bring the District to a higher industry standard for IT operations, cyber security, and business continuity.

District Recommendation 6 (Compliance): In order to meet the Standard, the team recommends that the District comprehensively responds to the recurring audit findings concerning: 1) the internal control weakness in information technology controls over the areas of security and change management; and 2) the state compliance exceptions related to “To Be Arranged” (TBA) hours attendance documentation and course classifications. (III.D.7)

As part of the ongoing efforts to correct audit findings, the District develops corrective action plans. The corrective action plan for technology controls was developed following the 2015 Audit indicating that the District would increase segregation of duties and further implement Security Weaver (D6.1 2014-2015 Audit p.82-84). The segregation of duties issue has been addressed with additional hiring of a Software Systems Engineer who developed and improved the processes related to security and change management. Over the past year, the District Information Technology Team refined internal controls to establish a list of users who should have administrative and other elevated (Super User) access within the district enterprise systems (SAP) (D6.2 LACCD SAP Privileged Access Report). The District has redacted names and usernames for security purposes. Full reports are available upon visit. The team conducted further reviews of roles and implemented processes and procedures to segregate duties. Additionally, the District Information Technology Division established a new process to limit the use of shared user IDs to ensure that access is appropriate to the user’s job responsibilities. In August 2016, the District engaged in its regularly scheduled audit. The auditing firm found significant improvements related to technology controls over the areas of security and change management. (D6.3 2015-2016 Audit p.96-98)

Past corrective action plans related to the audit findings for TBA hours have included training with no changes in internal procedures. The District worked to develop a new corrective action plan (D6.4 TBA Validation Process) that involves increased central review and control over the TBA reporting. This plan was shared with Chief Instructional and Student Service Officers in a joint meeting on May 20, 2016, for final revision and approval (D6.5 CIO CSSO Joint Council Agenda 5 20 16). The validation process includes periodic reviews of TBA courses to ensure that required curricular and attendance records are present. While the colleges still retain the autonomy to schedule TBA courses, the District assumes the role of verifying that all state requirements are satisfied prior to submitting final FTES reports. At the end of each semester, the Division of Educational Programs and Institutional Effectiveness will audit attendance records for compliance. Scheduled sections not meeting requirements will not be submitted for apportionment.

The corrective action plan was presented at a districtwide meeting to ensure all personnel involved were aware of the new processes (D6.6 Corrective Action - Audit - August 2016 Presentation). The plan was put into action for the 2015-2016 FTES reporting. All colleges worked with the District to ensure that sections included the correct documentation prior to submission. The external audit report found no deficiencies with TBA documentation and reporting, indicating that the reoccurring finding regarding TBA hours had been addressed (D6.7 2015-2016 Audit p.126-128). One course was identified as being used to address a student time conflict and was not related to the documentation of TBA hours.

District Recommendation 8 (Compliance): In order to meet the Standard, the team recommends that the District develop a process to capture the full impact of the District's liability for load banking and to record the liability in the District's financial statements. (III.D.12)

The District completed an assessment of load banking across all colleges and noted the liability in the financial statements (FINANCIAL STATEMENTS). Through collaboration with the college offices of academic affairs, the District has developed a system that, each semester, requires the colleges to submit required detailed information to calculate the district-wide load banking liability resulting from load banking at the colleges (D8.2 Load Banking Memo, D8.3 Load Banking work sheet 2017). The load banking information will be regularly reported to the Accounting Department and recorded as a liability in the District's books for use in the District's financial statements at the end of the fiscal year.

District Recommendation 10 (Compliance): In order to meet the Standard, the team recommends that the Board adopt policies that clearly define the process for the selection and evaluation of the chancellor. (IV.C.3)

In the evaluation of Board policies, the team determined that there were no policies that clearly identified the process for the selection and the evaluation of the chancellor. Board Rule Chapter X, Article III articulates hiring processes, including those for college presidents. Section 10309 was added to the Board Rule to clearly define the process for the selection of the Chancellor (D10.1 Ch. X - Article III). The revised Board Rule was approved by the Board on March 8th, 2017 and is in effect for the next selection process (D10.2 March 8 2017 Board_Agenda; D10.3 March 8 2017 Board Minutes).

The evaluation of the Chancellor was added to Board Rule Chapter X Article I, Human Resources Services (D10.4 Ch. X - Article I). Section 10105.13 defines the process of the evaluation of the Chancellor stating:

The Board shall conduct an evaluation of the Chancellor of the District at least annually. Such evaluation shall comply with any requirements set forth in the contract of employment with him/her as well as this policy. The Board shall evaluate the Chancellor using an evaluation process developed and jointly agreed to by him/her and the Board.

The criteria for evaluation shall be based on board policy, the Chancellor's job description, and overall priorities developed in accordance with board policy.

The Board Rule was approved on March 8th, 2017 (D10.2 March 8 2017 Board_Agenda; D10.3 March 8 2017 Board Minutes). The evaluation process goes into effect immediately and will be used in the annual evaluation of the Chancellor.

District Recommendation 11 (Compliance): In order to meet the Standard, the team recommends that the Board establish a formal process for approving the review of policies in which no revisions are made and to regularly assess the effectiveness of all policies in fulfilling the District mission. (IV.C.7)

The District has had a long established process for the regular review of policies and Board Rules defined in C-12 (D11.1 Admin_Reg_C_12 Previous Version). The previous process had called for District executive staff to review all Board rules on a triennial basis and to bring all proposed changes to the Board for approval. The procedure did not require the review of Board rules in instances when no changes were recommended. The recommendation from the visiting team stressed the need to revise the process to include a regular review even when no changes are recommended. In May 2016, administrative regulation C-12 was updated to include the provision that the Board review all policies on a triennial basis regardless of whether changes were recommended (D11.2 Admin Ref C 12). Specifically, the regulation indicates:

If the specified designee recommends that no changes be made to a particular rule or regulation, the rule will be noticed at the next scheduled Board meeting for subsequent affirmation. The next scheduled review period for that rule or regulation shall be calendared three years from the current year.

To ensure that all current Board Rules have been reviewed by the Board in the past three years, the Office of General Counsel provided all unchanged Board Rules for approval to the Board on December 7th, 2016 (D11.3 Board-Agenda December 7 2016 item C-5; D11.4 Board Minutes December 7 2016). To date, all Board Rules have been reviewed and approved by the Board at least once in the past three years, and the Office of General Counsel will continue its practices of tracking the review of all policies and procedures to ensure that triennial reviews occur. (D11.5 Board Rule Tracking)

The District has also used this recommendation as an opportunity to improve all of its policies through a process of continuous quality improvement. The Office of Educational Programs and Institutional Effectiveness in consultation with the Office of General Counsel will be working toward the adoption of the Community College League of California model policies. The District has developed a crosswalk of the model policies to current policies beginning with Chapter 2 (D11.6 Example Crosswalk) and assigned the revision of District policies to appropriate consultation groups. The District plans on integrating the model policies over the course of the next 18 months and believes that these efforts will provide additional uniformity to the District policies and a greater ability to respond to legislative changes from the state.