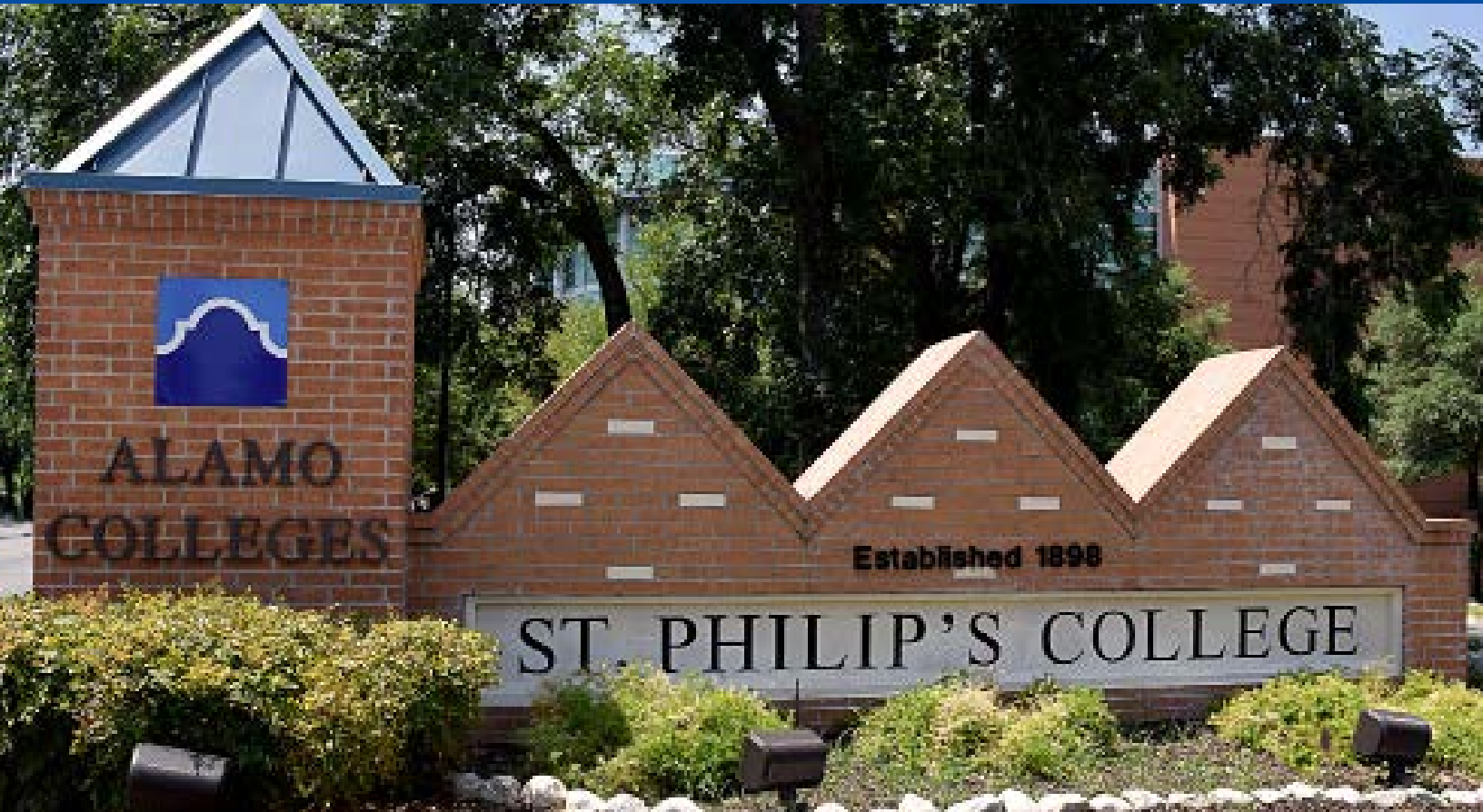


ST. PHILIP'S COLLEGE

1801 MARTIN LUTHER KING DRIVE, SAN ANTONIO, TEXAS 78203

Response Report



Southern Association of Colleges and Schools
Commission on Colleges

Prepared by
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ALAMO COLLEGES
ST. PHILIP'S COLLEGE

September 9, 2016

Southern Association of Colleges and Schools
Commission on Colleges
1866 Southern Lane
Decatur, Georgia 30033

Dear SACS-COC Board of Trustees:

In response to the SACS-COC Reaffirmation Visiting Committee's recommendations in October 2015, please find the attached St. Philip's College (SPC) Response Report.

Submission of the Response Report to the SACS-COC Board of Trustees further provides St. Philip's College an opportunity to present a compelling argument for compliance through the illustration of autonomy in the following areas:

- Comprehensive Standard 3.4.4- Acceptance of Academic Credit
- Federal Standard 4.7, Title IV

St. Philip's College, founded in 1898, has been a leader in education for over a century, and is always working toward continuous improvement which has been an integral part of our college community for decades. We are proud to have a college culture that reflects our accomplishments as we simultaneously continue to strive for constant improvement on our journey to excellence.

The SACS-COC Response Report demonstrates both commitment to our mission and achievements in accomplishing that mission.

Thank you for reviewing our SACS-COC Response Report, it signifies the dedication and obligation of St. Philip's College to offer students a sound education.

Sincerely,

A handwritten signature in cursive script that reads "Adena Williams Loston".

Adena Williams Loston, Ph.D.

President

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3.4.4 Acceptance of Academic Credit

SACS-COC Recommendation

The institution publishes policies that include criteria for evaluating, awarding, and accepting credit for transfer, experiential learning, credit by examination, Advanced Placement, and professional certificates that are consistent with its mission and ensure that course work and learning outcomes are at the collegiate level and comparable to the institution's own degree programs. The institution assumes responsibility for the academic quality of any course work or credit recorded on the institution's transcript. **(See Commission policy "Agreements Involving Joint and Dual Academic Awards: Policy and Procedures.") (Acceptance of academic credit)**

SACS-COC Public Disclosure 2016:

The Committee on Compliance and Reports, a standing committee of the SACS-COC Board of Trustees, deferred action on reaffirmation of accreditation for six months and authorized a special committee to visit St. Philip's College, in San Antonio, Texas

The Committee was unable to determine the autonomy of St. Philip's College within the Alamo Community College District in order to take action on reaffirmation of accreditation as separately accredited entity. In order to do so, a Special Committee was authorized to review the following standards of the Principles of Accreditation:

Core Requirement 2.3 (Chief executive officer), Comprehensive Standard 3.2.2.3 (Governing board control - institutional policy), Comprehensive Standard 3.2.7 (Organizational structure), Comprehensive Standard 3.2.9 (Personnel appointment), Comprehensive Standard 3.4.1

(Academic program approval), Comprehensive Standard 3.4.4 (Acceptance of academic credit), Comprehensive Standard 3.4.7 (Consortial relationships/contractual agreements), Comprehensive Standard 3.4.10 (Responsibility for curriculum), Comprehensive Standard 3.7.5 (Faculty role in governance), and Comprehensive Standard 3.13 (Policy compliance - Reaffirmation of Accreditation and Subsequent Reports).

St. Philip's College Response

St. Philip's College defined and published procedures for evaluating, awarding, and accepting credit for transfer, experiential learning, and credit by examination, Advanced Placement (AP), and professional certificates. St. Philip's College procedures ensure the full responsibility for the academic quality of any course or credit recorded on the institution's transcript through effective, efficient, and collaborative faculty participation in the acceptance of academic credit.

Demonstration of Autonomy

The [Transfer Credit Policy](#) is published in the St. Philip's College online catalog and available to all students. Policies are available in the college catalog for the following:

- Transfer Transcript Evaluation
- Military Transfer
- Transfer Credit Evaluation for Students Submitting Transcripts from Foreign Institution
- Transfer Dispute Resolution
- Transfer Rules non-compliance Policy

Credit by Non-Traditional Means and External Standardized Exams

- Internal Examinations
- College Level Examination Program (CLEP) and Advanced Placement (AP)

- Tech Prep Articulation Agreements
- Work Experience and Prior Learning Credit
- Continuing Education Units Conversion to Career and Technical Credit

To further illustrate autonomy, in October 2015, St. Philip's College strengthened the pre-existing institutional documents to include the comprehensive standard principle 3.4.4. on the new substitution form and experiential learning application.

- [St. Philip's College Request for Course Substitution Form \(On or prior to 11/1/2015\)](#)
- [St. Philip's College Request for Course Substitution Form \(After 11/1/2015\)](#)
- [St. Philip's College Experiential Learning Application \(On or prior to 11/1/2015\)](#)
- [St. Philip's College Experiential Learning Application \(After 11/1/2015\)](#)

A denotation on each of the forms includes the following:

- *This form serves as documentation and evidence of compliance with SACS-COC comprehensive standard 3.4.4 "St. Philip's College publishes policies that include criteria for evaluating, awarding, and accepting credit for transfer, experiential learning, credit by examination, advanced placement, and professional certificates that is consistent with its mission and ensures that coursework and learning outcomes are at the collegiate level and comparable to St. Philip's College own degree programs." "St. Philip's College assumes responsibility for the academic quality of any course work or credit recorded on its transcript."*

Further Evidence of Autonomy

St. Philip's College has a Transcript Posting-Processing Service Agreement with the Center for Student Information (CSI). The Center for Student Information is an extension and support office of St. Philip's College which provides support services such as processing of incoming

transcripts. The Center for Student Information (CSI) is approved to use the following to process pre-existing (only) course equivalency:

[Texas Common Course Numbering System \(TCCN\) \(see Texas Administrative Code \(TAC\) Title 19, Chapter 4, Sub Chapter B Rule 4.24\)](#)

[Lower Division Academic Course Guide Manual \(see Academic Course Guide Manual, \(ACGM\) and Texas Administrative Code \(TAC\) Title 19, Chapter 4, Sub Chapter b Rule 4.25\).](#)

Workforce Education Course Manual (WECM) ([See Institutional Process Based-on the "St. Philip's College and Center for Student Information Service Agreement"](#))

Banner SHATATR Data Base (previously equated courses)

The Center for Student Information (CSI) does not have authority to evaluate courses that are not found in any of the St. Philip's College approved course equivalency systems or manuals listed above. St. Philip's College faculty discipline leaders, program coordinators and faculty chairs are responsible for evaluating courses to determine equivalencies, as described in the [Service Agreement between St. Philip's College and the Center for Student Information.](#)

In addition to ensuring institutional published policies that include criteria for evaluating, awarding, and accepting credit for transfer, experiential learning, credit by examination, Advanced Placement (AP), and professional certificates that are consistent with St. Philip's College mission, the College **must ensure that course work and learning outcomes are at the collegiate level and comparable to the institution's own degree programs.**

Demonstration of Autonomy in Ensuring Coursework and Learning Outcomes are Collegiate and Comparable to the Institutions own Degree programs:

- St. Philip's College Request for Course Substitution (St. Philip's College provides students the opportunity to receive equivalent college semester credit hours earned through a

request for course substitution. This documentation provides evidence that faculty participate in the acceptance of academic and transfer credit).

Documentation and evidence of [course substitution approvals](#) and course substitution denials are completed by St. Philip's College faculty from each of the Academic Divisions: Division of Arts and Sciences, Division of Health Sciences and Division of Applied Science and Technology.

St. Philip's College provides students the opportunity to receive equivalent college semester credit hours earned through an experiential learning application. This documentation provides evidence that faculty participate in the acceptance of academic and transfer credit.

Documentation and evidence of experiential learning application approvals and experiential learning application denials are completed by the Division of Applied Science and Technology and the Division of Health Sciences.

- ([St. Philip's College Experiential Learning Application](#)) Credit by Experience Learning, Examination, Advanced Placement
- St. Philip's College provides students the opportunity to receive equivalent college semester credit hours earned through Advanced Placement (AP) and non-traditional means. St. Philip's College, with appropriate departmental guidelines, reserves the right to determine the acceptable transfer credit to a maximum of thirty-two (32) semester credit hours once the student has earned six (6) college semester credit hours at any of the Alamo Colleges.

Work experience/prior learning credit can be awarded and is posted on a student's official college transcript. The request is submitted by the appropriate department chair, through the Dean, and up to the Vice President of Academic Success for final approval. A maximum of twelve (12) semester credit hours may be earned through the assessment of work

experience/prior learning and applied toward graduation. Credit hours earned by examination and/or awarded through non-traditional means will be posted as Credit (CR) and will not be included in a student's Grade Point Average computation; however, the semester credit hours are counted for graduation. Credit by non-traditional means may not be awarded once a grade has been earned. Students planning to transfer to other institutions should consult with those institutions regarding their policies on granting non-traditional credit.

St. Philip's College provides students the opportunity to receive equivalent college semester credit hours earned through an experiential learning application. This documentation provides evidence that faculty participate in the acceptance of academic and transfer credit.

Documentation and evidence of [experiential learning application approvals](#) and [experiential learning application denials](#) are completed by the Division of Applied Science and Technology and the Division of Health Sciences.

Summary

St. Philip's College publishes policies that include standards for evaluation, awarding, and accepting credit for transfer, credit by experiential learning, examination and Advanced Placement (AP) that is consistent with its mission and ensures that course work and learning outcomes are at the collegiate level and comparable to the institution's own degree programs. Qualified faculty participate in the evaluation of credit; more importantly, the institution is autonomous and demonstrates full compliance, as St. Philip's College assumes responsibility for the academic quality of any course work or credit recorded on the institution's transcript.

4.7 Title IV Program Responsibilities

SACS-COC Recommendation

The institution is in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended. (In reviewing the institution's compliance with these program responsibilities, the Commission relies on documentation forwarded to it by the U.S. Department of Education.) **(Title IV program responsibilities)**

The institution has a Program Participation Agreement, which allows the college to participate in Title IV programs through December 2016. The institution provided A-133 audits for FY12, FY13, and FY14. Each audit contained one A-133 finding related to the 30-day notification to students of disbursement of direct loans. In response to the A-133 audit findings, the institution provided documentation of corrective actions; however, the FY15 audit would need to be completed to ensure the successful implementation of the corrective actions.

Additionally, the institution acknowledged that the Department of Education conducted a program review of the institution's Title IV programs in May 2012, wherein 12 findings were cited. While the institution submitted corrective actions, the DOE has not issued a final program review determination letter. Based upon the uncertainty of the DOE's final determination, the institution is not in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended.

Recommendation #2: The committee recommends that the institution demonstrate compliance with program responsibilities under Title IV of the most *Higher Education Act* as revised.

St. Philip's College Response

St. Philip's College was found in non-compliance with Federal Requirement 4.7 by the Southern Association of Colleges and Schools Commission on Colleges (SACS-COC) On-Site Reaffirmation Committee. The following documentation and evidence demonstrates that St. Philip's College is in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended.

SACS-COC Recommendation/Comments: The institution has a Program Participation Agreement, which allows the college to participate in Title IV programs through December 2016. The institution provided A-133 audits for [Fiscal Year 2012](#), [Fiscal Year 2013](#), and [Fiscal Year 2014](#). Each audit contained one A-133 finding related to the 30-day notification to students of disbursement of direct loans. In response to the A-133 audit findings, the institution provided documentation of corrective actions; however, the FY15 audit would need to be completed to ensure the successful implementation of the corrective actions.

St. Philip's College Response Concerning the Fiscal Year 2015 Audit

St. Philip's College is in full compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended. In January 2016, the following Comprehensive Annual Financial Report (CAFR) for the Alamo Community College District (Alamo Colleges or District Support Operations) for fiscal year ended August 31, 2015, [Fiscal Year 2015 Audit](#) was presented and [approved by the Alamo Community College District Board of Trustees on December 15, 2015.](#)

The Comprehensive Annual Financial Report (CAFR) was prepared in conformance with the financial reporting standards applicable to governmental entities set forth by reporting requirements of the Government Finance Officers Association (GFOA). The report complies

with the requirements of Annual Financial Reporting Requirements for Texas Public Community and Junior Colleges as set forth by the Texas Higher Education Coordinating Board (THECB) and illustrates full compliance of Title IV program responsibilities as set forth by Southern Association of Colleges and Schools Commission on Colleges (SACS-COC).

Although the A-133 audit is compiled by the Alamo Community College District Support Operations and combines all Alamo Colleges in one report, all report data regarding St. Philip's College expenditures is entirely controlled and determined by the College. St. Philip's College makes all decisions regarding the allocation of funds to departments within the College. Furthermore, the College administration oversees and controls the disbursement of [Resource Allocation Request funds](#) as part of its [Planning, Budgeting and Assessment Cycle](#), which is determined by St. Philip's College.

SACS-COC Recommendation/Comments: Additionally, the institution acknowledged that the Department of Education conducted a program review of the institution's Title IV programs in May 2012, wherein 12 findings were cited. **While the institution submitted corrective actions, the DOE has not issued a final program review determination letter.** Based upon the uncertainty of the DOE's final determination, the institution is not in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended.

St. Philip's College Response Concerning the Department of Education (DOE) Final Determination Letter

On **December 21, 2015**, Cynthia Thornton, Director of the Dallas School Participation Division notified Dr. Adena Williams Loston, President of St. Philip's College, in a [formal notification letter](#) that St. Philip's College documentation received in response to the instructions provided in the

Final Program Review Determination notification addressed all requirements. The notification also deemed that the Program review is now closed.

On **February 8, 2016**, the U.S. Department of Education's Direct Loan Reconciliation Team notified St. Philip's College of the receipt request to be closed out for the 2014-2015 Direct Loan Program Year. In this [email documentation from the U.S. Department of Education \(DOE\)](#), the direct loan reconciliation team confirms St. Philip's College ending cash balance for this year is at an acceptable level and has not changed since the original request was made. Additionally, the Department of Education (DOE) states in the email documentation that St. Philip's College has successfully completed processing for the 2014-2015 Direct Loan Program Year. As stated in the documentation,

To complete the Program Year Closeout process for St. Philip's College, the Department of Education (DOE) has taken the following actions:

1. Stopped processing or accepting any Direct Loan data without Department of Education (DOE) review and approval.
2. The School Account Statement (SAS) and other Direct Loan reports will no longer be sent to your school for this program year unless your balance changes.
3. The Department of Education (DOE) will reduce your school's Direct Loan Current Funding Level (CFL) to your Total Net Drawdowns/Payments (Cash Receipts - Refunded Cash).

Furthermore, the preceding evidence provides certainty of the Department of Education's final determination; St. Philip's College successfully completed the closeout process for the 2014-2015 Direct Loan Program Year.

4.7 Title IV Action Plan

To ensure St. Philip's College is in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended, established quarterly meetings with the District Support Operations Director of Financial Aid, Dr. Harold Whitis, have been implemented into an [action plan](#) with Outlook Calendar quarterly meeting dates. [Quarterly meetings](#) have occurred on January 4, 2016, April 1, 2016, and June 28, 2016, with the next meeting scheduled for September 28, 2016.

To ensure St. Philip's College continues to maintain compliance with the Department of Education and the Southern Association of Colleges and Schools Commission on Colleges (SACS-COC), the Vice President of Student Success (VPSS), in collaboration with the St. Philip's College Accreditation Liaison, will continue to review all necessary 4.7 requirements to include all Title IV programs on a quarterly meeting basis with the District Support Operations Director of Financial Aid, and any other support parties such as, but not limited to: Vice President of College Services (VPCS), District Support Operations Police, Financial Aid Representatives at St. Philip's College, etc. District Support Operations provides the information necessary for St. Philip's College to create and control the process.

Annual Security Report

St. Philip's College has developed a variety of plans and procedures in order to ensure the safety of all students and employees. The College has adopted the [National Incident Management System](#) and has [employees trained](#) in this federal emergency management protocol. Furthermore, the College-specific Campus Emergency Operations Plans ([Martin Luther King Campus](#) and [Southwest Campus](#)), the Standard Operating Procedures ([Martin Luther King Campus](#) and [Southwest Campus](#)), Building Action Guides (i.e., [Industrial](#)

[Technology Center](#) and [Norris Technical Building](#)), evacuation plans ([Martin Luther King Campus and Southwest Campus](#)) and [Business Continuity Plan \(Disaster Recovery Plan\)](#) were all developed solely by St. Philip's College. In addition, the St. Philip's College Office of the Vice President of College Services oversees the [Emergency Preparedness Committee](#) and [Building Action Team](#) as well as all drills carried out on both campuses. The Vice President of College Services develops the [drill schedules](#), creates [reports](#) on each drill and collects [evaluations](#) and [sign-in sheets](#). All such activities are solely under the control of St. Philip's College.

The preceding evidence supports the fact that St. Philip's College controls its own emergency preparedness and response activities.

Drug and Alcohol Prevention Program

The Vice President of Student Success and the Dean of Student Success at St. Philip's College oversee the creation and dissemination of the Drug and Alcohol Prevention Program biennial review ([2011-2013](#) and [2013-2015](#)). In addition, St. Philip's College provides extensive resources to students and employees regarding drug and alcohol prevention. St. Philip's College Counseling Services provides information to students through [various workshops and College events](#). This office also utilized their semester-long Wildly Important Goal (WIG) project to promote drug and alcohol awareness, which resulted in an [informational flyer](#) with helpful information for the College community. All such activities are solely under the control of St. Philip's College.

Such evidence supports the fact that St. Philip's College controls its own Drug and Alcohol Prevention Program.

Summary

In addition to the examples stated above, St. Philip's College provides information related to its compliance with the Southern Association of Colleges and Schools Commission on Colleges (SACS-COC) Federal Requirement 4.7 on its website. Students, employees and the public can view documents related to the autonomy of St. Philip's College on [this page](#). This website and the evidence provided above support the fact that St. Philip's College controls all activities related to its program responsibilities under Title IV of the most recent Higher Education Act as amended.



ALAMO COLLEGES

ST. PHILIP'S COLLEGE

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