

SACSCOC REAFFIRMATION FOCUSED REPORT



Submission Information

Institution Name:

St. Philip's College

Institution Address:

**1801 Martin Luther King Dr.
San Antonio, TX 78203**

Preparer Information:

**Dr. Maria Hinojosa, Director
Planning, Research and Effectiveness**

Parent Accreditation Report

[Institutional Summary](#)



ALAMO
COLLEGES

ST. PHILIP'S COLLEGE
Office of the President

August 7, 2015

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

Dear SACSCOC Review Committee:

In response to the SACSCOC Preliminary Report of the Reaffirmation Committee, please find the attached Focused Report of St. Philip's College (SPC). The Focused Report submitted to the On-Site Reaffirmation Committee further gives St. Philip's College a second opportunity to present a convincing argument for compliance. As with our initial Certification Compliance Report submitted in Spring 2015, this process also required participation of key administrators, faculty, staff, as well as the attention of everyone on campus to ensure an accurate presentation of our practices, policies, and outcomes to our On-Site peer reviewers.

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

Our SACSCOC Focused Report demonstrates both our commitment to our mission and our achievements in accomplishing that mission.

Thank you for reviewing our Focused Report. It signifies our dedication and obligation of St. Philip's College to offer its students a sound education.

Sincerely,

Adena Williams Loston, Ph.D.
President

Standard 4.7 Title IV Program Responsibilities

SACSCOC Feedback

4.7 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)**

Non-Compliance

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.

4.7 Focused Report 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 (SACSCOC) Off-Site Reaffirmation Committee. The following focused report will demonstrate that the institution is in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended.

The Off-Site Reaffirmation Committee stated the institution has a Program Participation Agreement, which allows the college to participate in Title IV programs through December 2016. St. Philip's College provided A-133 audits for [Fiscal Year 2012](#), [Fiscal Year 2013](#), and [Fiscal Year 2014](#) in our original response; however, the Fiscal Year 2015 audit will not be completed until December 2015.

In regard to the Department of Education findings, a [Final Program Review Determination \(FPRD\) letter](#) was received on April 23, 2015. As a result of the Final Determination, where 12 findings were cited, **9 of the 12 findings (2-10) were resolved** with the provided supporting documentation and the corrective actions taken by St. Philip's College. Therefore, the following findings are considered closed by the United States Department of Education – **Findings 2, 3, 4, 5, 6, 7, 8, 9 and 10.** The other 3 findings (**Findings 1, 11 and 12**) that were cited and require further action by St. Philip's College have been addressed in the following manner:

Department of Education Finding #1 and the St. Philip's College Response: Student Credit Balance Deficiencies

St. Philip's College acknowledged that funds needed to be returned to the United States Department of Education. Diane Snyder (Alamo Colleges Vice Chancellor for Finance and Administration) along with Ms. Ann DeBarros (Alamo Colleges District Comptroller) and Dr. Harold Whitis (Alamo Colleges District Director of Student Financial Services) contacted the Department of Education to assure them that we were ready to resolve the Financial obligations and funds had been set aside to do so.

St. Philip's College submitted [payments totaling \\$120,903.36](#) on June 2, 2015. With these submissions, St. Philip's College has paid in excess of 95% of all student credit balance deficiencies. The remaining balance will be reviewed through appeal due to data discrepancies uncovered during the accounting review. The [appeal](#) was submitted on June 11, 2015.

Department of Education Finding #11: Annual Security Report Does Not Meet Requirements

As quoted from the [U.S. Department of Education Final Program Review Determination Letter](#): "St. Philip's College's 2011 Annual Security Report does not include required emergency response and evacuation procedures, including information regarding the testing of those procedures and documentation of the tests...Although the finding is now closed, St. Philip's College is reminded that the exceptions identified above constitute serious violations of the Clery Act that by their nature cannot be cured. There is no way to truly 'correct' a violation of this type

once it occurs. The College was required to take remedial action and in doing so, has begun to address the conditions that led to the violations. St. Philip's College has stated that it has brought its overall campus safety program into compliance with the Clery Act required by its Program Participation Agreement (PPA). Nevertheless, St. Philip's College officials must understand that any failure to publish and distribute an accurate and complete Annual Security Report deprives students and employees of important campus safety information to which they are entitled. For these reasons, the College is advised that its remedial actions, whether already completed or planned for the future, cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as result."

St. Philip's College Response to Department of Education Finding #11: Annual Security Report Does Not Meet Requirements

Alamo Colleges, to include St. Philip's College, publishes an [Annual Security and Fire Safety Report](#), which is readily available to all students, employees and community members. This report is disseminated to all students and employees via email. Refer to the emails from [2012](#), [2013](#) and [2014](#) for more information. Furthermore, emergency procedures are available in the [Student Handbook](#).

As of January 2013, Alamo Community College District and St. Philip's College have adopted the federal emergency management protocol known as [National Incident Management System](#) and developed a comprehensive [Martin Luther King Emergency Operations Plan](#) and a [Southwest Campus Emergency Operations Plan](#) with supporting Standard Operating Procedures (SOPs) for both the [Martin Luther King](#) and [Southwest](#) campuses. The Emergency Operations Plan and Standard Operating Procedures provide procedures, training, evacuation, reverse evacuation and shelter-in-place plans for emergency scenarios for the benefit and protection of the entire St. Philip's College community. Full compliance to the National Incident Management System standards throughout Alamo Community College District operations is expected to be implemented completely by late 2015. St. Philip's College has [faculty and staff who have tested and passed the requirements](#) specified in the National Incident Management System serving on our emergency response teams at both Martin Luther King and Southwest campuses.

In addition to the Emergency Operating Plan and Standard Operating Procedures, every occupied building on campus has a Building Action Guide (i.e., [Industrial Technology Center](#) and [Norris Technical Building](#)) to assist the Building Action Teams at [Martin Luther King](#) and [Southwest](#) campuses to perform immediate protective actions in the case of a serious incident. Building-specific evacuation plans at both [Martin Luther King](#) and [Southwest](#) campuses are included in each guide as well as [posted on all floors of each building](#). The guides also provide a listing of team members, response resources on the floor of each building, response kit contents for the teams and the location of external and internal assembly areas. Off-site operations should have similar documents in place by the end of calendar year 2015. Response teams are asked to

complete evaluations after all major training and drill functions which is then compiled and documented in an [evacuation drill report](#).

Although great strides have been made since 2013, Emergency Preparedness is still very much a work in progress. Much is still in stages of development. The Alamo Community College District Enterprise Risk Manager is developing a comprehensive Continuity of Operations Plan (COOP) for each college, administrative office and off-site operation throughout Alamo Community College District. These documents will provide specifics about resources necessary for recovery from emergency incidents, to ensure the resiliency of critical operations needed for the core mission of the Alamo Colleges. St. Philip's College Information and Communication Technology (ICT) has a [Business Continuity Plan \(Disaster Recovery Plan\)](#) in place, which is tested on a regular basis to ensure the continuity of critical operations. Information and Communication Technology also works to minimize the risk and reduce the impact of security-related incidents as well as to promote information security awareness throughout St. Philip's College and the Alamo Community College District.

St. Philip's College responded to the Department of Education on [June 22, 2015](#).

Department of Education Finding #12, Part 86: Drug and Alcohol Prevention Program Requirements Not Met

As quoted from the [U.S. Department of Education Final Program Review Determination Letter](#):

"St. Philip's College could not document that it conducts a biennial review of its drug prevention program to determine its effectiveness or to ensure the consistent enforcement of its disciplinary sanctions. St. Philip's College was unable to provide a copy of the biennial review report.

In addition, St. Philip's College does not have an annual distribution to all students of information concerning drug and alcohol abuse and the school's prevention program. Information regarding drug and alcohol abuse is listed in the school catalog under Student Code of Conduct which can be accessed electronically. No annual notice is sent to students, faculty and staff.

Although the finding is now conditionally closed, St. Philip's College is reminded that the exceptions identified above constitute very serious and persistent violations of the Drug Free Schools and Communities Act (DFSCA) that by their nature cannot be cured. There is no way to truly 'correct' a violation of this type once it occurs. The College was required to take remedial action. The College has initiated some such actions and is required to take immediate steps to implement the rest of its remedial action plan as directed above and as required by the Program Participation Agreement (PPA). While this is an important first step, St. Philip's College officials must understand that compliance with the Drug Free Schools and Communities Act (DFSCA) and the Clery Act are essential to maintaining a safe and healthy environment, especially in the light of the fact that more than 90% of all violent campus crimes are drug and/or alcohol-related."

St. Philip's College Response to Department of Education Finding #12, Part 86: Drug and Alcohol Prevention Program Requirements Not Met

St. Philip's College has a biennial review for [Academic Years 2011-2013](#) and Academic Year 2014-2015 is to be completed by September 30, 2015. These reports show that St. Philip's College has had no drug- or alcohol- related violations or fatalities reported to campus officials in these years; however, the reviews also include procedures for handling any such incidents. The biennial review for Academic Years 2011-2013 was distributed to both [students](#) and [employees](#) via email as well as in the [St. Philip's College \(SPC\) Weekly](#) email from the Community and Public Relations office.

Both students and employees have access to a variety of support services and information regarding drug and alcohol prevention. The [Employee Assistance Program \(EAP\)](#) provides employees with various services to include drug and alcohol counseling. All St. Philip's College employees are required to complete the annual [Drug-Free Workplace training](#). [Counseling Services](#) assists students by providing a variety of [brochures](#), distributed during New Student Convocation and readily available at both campuses in the Counseling Services area at all times. Counseling Services collaborates with multiple departments on each campus to allow for the distribution of drug and alcohol awareness information at a variety of college events. [Alcohol and Mood Disorder Screening](#) is available online 24 hours a day, 7 days a week to employees, students and the community. Information is also available in the [Student Handbook](#) and the [Student Code of Conduct](#).

St. Philip's College responded to the Department of Education on [June 25, 2015](#).

Summary

St. Philip's College has addressed the concerns of the Off-Site Reaffirmation Committee and is in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended. As described above, St. Philip's has submitted all necessary reports and documentation to the U.S. Department of Education in response to three findings in the Final Program Review Determination (FPRD) report. The College is currently awaiting a response from the Department of Education on these three findings, including an appeal of one finding.