



July 11, 2017

Dr. Mike Flores
President
Palo Alto University
1400 W. Villaret Blvd.
San Antonio, TX 78224

Dear Dr. Flores:

The Southern Association of Colleges and Schools Commission on Colleges' policy, "Unsolicited Information," (available at www.sacscoc.org/pdf/081705/UnsolicitedInformation.pdf) stipulates that the Commission give appropriate consideration to significant accreditation-related unsolicited information revealed about an institution between periods of its scheduled review. This policy affords an institution the opportunity to respond to concerns raised by the review of the unsolicited information.

At its meeting in December 2016, the Board of Trustees of the Southern Association of Colleges and Schools (SACSCOC) voted to deny reaffirmation of accreditation and place three of five institutions in the Alamo Community College District on Warning for 12 months for failure to comply with Comprehensive Standard 3.2.6 (Board/administrative distinction), Comprehensive Standard 3.4.4 (Acceptance of academic credit), Comprehensive Standard 3.4.5 (Academic policies), Comprehensive Standard 3.4.10 (Responsibility for curriculum), Comprehensive Standard 3.13 (Policy compliance: "Reaffirmation of Accreditation and Subsequent Reports"), and Federal Requirement 4.7 (Title IV program responsibilities) of the *Principles of Accreditation*. This action followed a June 2016 decision to defer action on reaffirmation pending the receipt and review of monitoring reports and Special Committee Reports on issues regarding institutional autonomy.

I am writing to you today because the questions raised during the Board's review of the monitoring reports and Special Committee Reports regarding institutional autonomy appear to be applicable to all institutions within the Alamo Community College District. As such, this information has raised questions about Palo Alto College's ongoing compliance with the standards cited above. In light of these circumstances, and in accordance with the Commission's policy and procedures, I ask the institution to prepare a report that explains and documents the extent of its compliance with these standards.

Please submit to my office two (2) copies of the institution's response to this letter no later than **September 8, 2017**, which formally responds to the following:

CS 3.2.6 (Board/administrative distinction)

This standard expects an institution to have a clear and appropriate distinction, in writing and practice, between the policy-making functions of the governing board and the responsibility of the administration and faculty to administer and implement policy.

Provide evidence that there is a clear and appropriate distinction between the policy-making functions of the Board and the operational implementation of policy by the institution's administration and faculty.



Dr. Mike Flores
July 11, 2017
Page Two

Comprehensive Standard 3.4.4 (Acceptance of academic credit)

This standard expects an institution to publish 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 course work and learning outcomes are at the collegiate level and comparable to the institution's own degree programs. It expects the institution to assume responsibility for the academic quality of any course work or credit recorded on the institution's transcript.

Verify that the course work or credit recorded on the institution's transcripts has been reviewed by the appropriate faculty in the discipline area for equivalency.

Comprehensive Standard 3.4.5 (Academic policies)

This standard expects an institution to publish academic policies that adhere to principles of good educational practice and that are disseminated to students, faculty, and other interested parties through publications that accurately represent the programs and services of the institution.

Provide sufficient evidence that the transfer agreement with Alamo District Colleges (dated August 29, 2016) stating that courses from other Alamo District Colleges be recorded as transfer credit (not institutional credit) is implemented.

Provide evidence that a true institutional GPA is calculated and used in the determination of academic standing, honors for graduation, degree GPA, and federal financial aid.

Comprehensive Standard 3.4.10 (responsibility for curriculum)

This standard expects an institution to place primary responsibility for the content, quality, and effectiveness of the curriculum with its faculty.

Provide sufficient evidence that the faculty has primary responsibility for curriculum.

Comprehensive Standard 3.13 (Policy compliance: "Reaffirmation of Accreditation and Subsequent Reports")

This standard expects an institution to comply with the policies of the Commission on Colleges.

Provide sufficient evidence that the institution, as a separate entity, has authority for the appointment and employment of all institutional personnel. It appears that the Board of the Alamo Community College District, in Board Policy D. 2. 5, has delegated the authorities to the Chancellor of the system.

Provide sufficient evidence that your institution represents itself as a separate entity as exemplified in institutional materials, such as the College Catalog, websites, marketing materials, and other documents. Also, clarify whether the institution represents itself as a single institution (Alamo Colleges) with multiple campuses, or multiple independent institutions (Palo Alto College) with the U.S. Department of Education.



Dr. Mike Flores
July 11, 2017
Page Three

Federal Requirement 4.7 (Title IV program responsibilities)

This standard expects an institution to be in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended.

Clarify the institution's role to ensure compliance with the Title IV program responsibilities.

In accordance with Commission policy on the receipt of unsolicited information, the institution's response will be reviewed, and if Commission staff determines that the information is of factual substance and is accreditation related, the information and documentation, along with the institution's response will be forwarded to the SACSCOC Board of Trustees for formal review. Or, it is possible that the President of the SACSCOC could authorize a Special Committee to review the institution. If you have any questions, please feel free to contact me at (404) 492-5387.

Sincerely,

A handwritten signature in blue ink, reading "Denise Y. Young".

Denise Y. Young, Ph.D.
Vice President

DYY:ch

cc: Dr. Belle S. Wheelan, President, SACSCOC