

Los Angeles Pierce College Accreditation Follow-Up Report March 15, 2014

Pierce College 6201 Winnetka Avenue Woodland Hills, California 91731

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

March 15, 2014

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

	Certification of Follow-Up Report	
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We certify that there was broad participation in the preparation of this report by the college community; and, we believe the Follow-Up Report accurately reflects the nature and substance of this institution.

Signatures:

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Miguel Santiago President, Board of Trustees, Los Angeles Community College District

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Adriana Barrera, Ph.D. Interim Chancellor, Los Angeles Community College District

Gus Sandoval President, Associated Students, Los Angeles Pierce College

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Date

3/10/2014 Date

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In order to fully comply with the Standards, the College needs to review, update, and further integrate its various institutional plans, and formalize the integration among these plans as they contribute and align to an overarching institutional plan. (I.B.3)

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Recommendation 2

In order to meet the Standard on student learning outcomes, the team recommends that the College thoroughly assess its student learning outcomes processes and make necessary modification to ensure authentic assessments, to demonstrate student achievement, and to provide for widespread institutional dialogue. (II.A.1.c; II.A.2.i)

Recommendation 3

In order to fully comply with the Standard, the College should fully develop, implement, and assess internal control mechanisms for the expenditures of grants and specified funds including the Associated Student Organization trust accounts and the Foundation to ensure these activities align with the mission and goals of the college. (III.D.2.d; III.D.2.e)

Statement on Report Preparation

The Follow-Up Report was a collaborative effort involving faculty, staff, and administrators. The Pierce College Accreditation Steering Committee (ASC) served as the primary committee structure for the formation of the timeline, the initial development of the document, and the editorial commentary before its completion. The committee met monthly during the fall semester reviewing material appropriate to the responses in the Follow-Up Report. Membership consisted of representatives from the Institutional Effectiveness Office, Academic Affairs, Student Services and Administrative Services. Throughout the fall semester of 2013, various members consulted with appropriate participatory governance committees to gather relevant evidence and narrative content. The finalized report was then vetted and approved by the Pierce College Council (PCC) and the Academic Senate on January 23, 2014 and February 10, 2014 respectively. The Institutional Effectiveness Committee of the Board reviewed the Follow-Up Report at its regular meeting on February 26, 2014, and a recommendation for approval was made to the full Board. On March 12, 2014, the Board of Trustees approved the Follow-Up Report at its regular meeting.

Accreditation Steering Committee

Kate Astor, Office of Institutional Effectiveness Wendy Bass, Faculty Distance Education Coordinator Anna Davies, Vice President of Academic Affairs Greg Gilbertson, Faculty Accreditation Coordinator Karen Murray, Senior Administrative Assistant Kathy Oborn, Academic Senate President Earic Peters, Vice President of Student Services Margarita Pillado, Faculty Accreditation Coordinator/Vice President of Curriculum Rolf Schleicher, Vice President of Administrative Services Ishaque Suleman, Instructional Assistant Assistive Technology Donna-Mae Villanueva, Dean of Academic Affairs

Response to Recommendation One was guided by the Strategic Planning Taskforce, the Pierce College Council Executive Committee and the Academic Senate Executive Committee.

Strategic Planning Taskforce

Kate Astor, Office of Institutional Effectiveness Kathleen Burke, President of Pierce College Lyn Clark, Chair, Pierce College Council Anna Davies, Vice President of Academic Affairs David Follosco, Dean of Student Services Greg Gilbertson, Faculty Accreditation Coordinator Larry Kraus, Associate Vice President of Administrative Services Joe Perret, Treasurer of the Academic Senate Earic Peters, Vice President of Student Services Anafe Robinson, Director of Financial Aid Rolf Schleicher, Vice President of Administrative Services Phyllis Schneider, Director of Child Development Center Curtis Smith ASO Advisor/Assessment Director Mia Wood, Outcomes Coordinator, Secretary of the Academic Senate

<u>Pierce College Council Executive Committee</u> Kathleen Burke, President of Pierce College Henry Chang, Chapter Chair of AFT Staff Guild Lyn Clark, Chair of Pierce College Council Anna Davies, Vice President of Academic Affairs Izzy Goodman, Vice President of Academic Policy (an Academic Senate office) Greg Gilbertson, Faculty Accreditation Coordinator Kathy Oborn, Academic Senate President Earic Peters, Vice President of Student Services Rolf Schleicher, Vice President of Administrative Services Curtis Smith, Vice Chair, Pierce College Council Don Sparks, Chapter President, AFT Faculty Guild Local 1521

Academic Senate Executive Committee Kathy Oborn, President Izzy Goodman, Vice President Academic Policy Joe Perret, Treasurer Mia Wood, Secretary Margarita Pillado, Vice President of Curriculum

Response to Recommendation Two was informed by the College Outcomes Committee, the Curriculum Committee, and the Academic Senate Executive Committee.

College Outcomes Committee

Mia Wood, College Outcomes Committee Chair Kate Astor, Office of Institutional Effectiveness Beth Benne, Health Center Director Monique Cleveland, English/ESL Department Jeff Favre, Media Arts Department Dale Fields, Physics and Physical Sciences Department Loralyn Frederick, Student Services Clay Gedimon, Library Department Larry Kraus, Associate Vice President of Administrative Services Sheryl Nomelli, History Department

<u>Curriculum Committee</u> Margarita Pillado, Curriculum Committee Chair Elizabeth Atondo, Articulation Coordinator Kristine Ayvazyan, Admissions and Records Giselle Bulwa, Senior Secretary Beth Cheung, Industrial Technology Department Donna Covarrubias, International Student Admissions Advisor

Mike Flowers, Academic Affairs Tom Fortune, Industrial Technology Department Teresa Frost. Admissions and Records Miriam Gottlieb, Special Services Department Barbara Hambly, History Department Jodi Johnson, English Department Anne LeBarbu, Modern Languages Department Tesi Low, Life Sciences Department Connie Moffatt, Art Department Shilo Nelson, Health, Kinesiology, and Athletics Department Paula Paggi, Library Department Skip Perkins, Music Department Cristina Rodriguez, Counseling Department Emmanuel Sabaiz, English Department Ben Smith, Math Department Chad Snow, Psychology Department Becky Yates, Agriculture Department Adrian Youhanna, Anthropology and Geography Department Donna-Mae Villanueva. Dean of Academic Affairs

Response to Recommendation Three was addressed by the Vice President of Administrative Services and the Associate Vice Presidents of Administrative Services. Additional counsel came from the Foundation and the Vice President of Student Services.

Rolf Schleicher, Vice President of Administrative Services Earic Peters, Vice President of Student Services Larry Kraus, Associate Vice President of Administrative Services Bruce Rosky, Associate Vice President of Administrative Services Floriya Borzenkova, Senior Program Director of the Foundation Kathy Zanghi, Accounts Manager of the Foundation

Recommendation 1

In order to fully comply with the Standards, the College needs to review, update, and further integrate its various institutional plans, and formalize the integration among these plans as they contribute and align to an overarching institutional plan. (I.B.3)

The Los Angeles Community College District (LACCD) produced a strategic plan (1.001) in late spring 2013. This plan is the cornerstone for the College's new Strategic Master Plan (SMP). Previously, the college operated with the Educational Master Plan (EMP) as the guiding plan, but this focus on educational programs did not easily account for operational services provided by Administrative Services. In order to capture all of the College's operational objectives, the concept of the new Strategic Master Plan provides the College with an inclusive overarching plan, allowing for Academic Affairs, Student Services, as well as Administrative Services to each align their respective plans with the Strategic Master Plan. (1.002)

The President of Pierce College presented the Completion, Accountability, Partnerships, and Student Success (CAPS) concept at our annual Opening Day on August 22, 2013. (1.003) The CAPS concept is a two-fold approach to planning: first, it regulates the planning cycle and its three phases of operation -- planning, implementation and plan assessment to an annual calendar; secondly, it provides opportunity for the four divisions of the college (Office of the President, Academic Affairs, Student Services and Administrative Services) to integrate their plans with a larger overarching college plan. Moreover, this plan aligns with the District's Strategic Plan.

The CAPS concept was vetted at the Pierce College Council where it passed unanimously. It was again presented to and endorsed by the Academic Senate. (1.004, 1.005) The development of the plan was initiated by a taskforce with representatives from the three divisions: Academic Affairs, Administrative Services, and Student Services and consisted of faculty, staff and administration. The Pierce College Council chair, who also served as the chair of the taskforce, scheduled weekly Monday meetings and presided over the collaborative efforts of the taskforce and the production of the plan. With the Los Angeles Community College District's plan as the model document for goal setting of the taskforce, objectives and measurements were discussed at length and established in the working document.

The acronym CAPS addresses the following through a series of operational college goals:

Completion

Increase student completion of degrees and certificates, and college transfer requirements.

Increase the number of entering students who complete the matriculation process during the first semester.

Increase the long-term persistence rates of students.

Ensure equitable access to education.

Accountability

Improve financial reporting processes for more accurate budgetary forecasting, allowing for fiscal stability.

Improve operational efficiencies and processes along with internal cash controls.

Improve campus-wide health, safety, and security through enhanced risk-management practices.

Improve facilities oversight of both bond-related and state-funded alterations and improvements.

Increase self-auditing to ensure compliance with program requirements.

Develop and implement professional development programs for faculty and staff.

Continue to meet FTES base and attempt to grow the College's student FTES enrollment to 2006 levels and then increase 5% per year.

Partnerships

Develop and enhance revenues generated through grants, entrepreneurial ventures and community partnerships.

Expand productive sustainable community alliances.

Foster partnerships with business and industry.

Student Success

Address the basic skills needs of underprepared students in developmental and introductory courses.

Enhance customer service interfaces considering timely responses and quality of experience.

Maintain a robust and reliable information technology infrastructure with current computing equipment for the entire college population.

Support faculty and staff by maximizing the effective use of technology, enabling academic innovation in instructional delivery.

Provide a learner-centered environment that promotes active learning and student engagement.

Increase student awareness and use of student support services and programs.

Increase student participation in Associated Student Organization (ASO) activities and participatory governance committees.

The finalized Strategic Master Plan was approved by the Pierce College Council on December 12, 2013 and Academic Senate on December 9, 2013. (1.006, 1.007) It was considered by the Institutional Effectiveness Committee of the Board on January 29, 2014 and a recommendation for approval was made to the full Board. On February 26, 2014, the Board of Trustees approved the Strategic Master Plan. To ensure integration and alignment of all plans with the Strategic Master Plan, the College Planning Committee will provide oversight and will monitor the timely sequence of planning, implementation and assessment of each committee plan in accordance with the planning calendar. (1.008) To ensure implementation, assessment and evaluation of all plans will begin in spring of 2014.

Appendices

- R1.001 Los Angeles Community College District Strategic Plan
- R1.002 Pierce College Strategic Plan
- **R1.003** Opening Day Presentation CAPS
- R1.004 Pierce College Council Minutes/ CAPS
- R1.005 Academic Senate Minutes/CAPS
- R1.006 Pierce College Council Minutes /Strategic Plan
- R1.007 Academic Senate Minutes/Strategic Plan
- R1.008 College Planning Committee minutes

Recommendation 2

In order to meet the Standard on student learning outcomes, the team recommends that the College thoroughly assess its student learning outcomes processes and make necessary modification to ensure authentic assessments, to demonstrate student achievement, and to provide for widespread institutional dialogue. (II.A.1.c; II.A.2.i)

Pierce College hosts an Annual Leadership Retreat before the beginning of each fall semester. This retreat consists of department chairs, deans, Student Learning Outcomes coordinators, union representatives, Senate Executive Committee members, Pierce College Council Executive Committee members, vice presidents of Administrative Services, Academic Affairs and Student Services, the management of Information Technologies, and of Facilities departments and the president of the college. (2.000, 2.001)

One of the focal points during Pierce College's Annual Leadership Retreat was the discussion of authentic assessment and the need for a college-wide definition, which led to the adoption of the following statement by Jon Mueller, who is a Professor of Psychology at North Central College in Illinois: (2.002)

Authentic assessment is a form of assessment in which students are asked to perform tasks that demonstrate meaningful application of essential knowledge and skills.

The definition was then presented at the annual Pierce College Opening Day on August 23, 2013. This daylong event consists of presentations from the Academic Senate, unions, and the president of the College and is attended by faculty, administration and classified staff. (2.003) Faculty met with their respective departments and discussed authentic assessment as it relates to the discipline, evaluated and planned the assessment cycle, assigned a department liaison to interface with the College Outcomes Committee (COC), and evaluated past assessment activities and action plans. To aid the dialogue, faculty were assigned the following discussion topics:

I. Summary of departmental discussion on authentic assessment in relation to each of the discipline:

II. Assessment cycle planning

III. 2013-2014 timeline for reviewing current course and program reports for completion (especially robust summary and action plan sections):

IV. Fall 2013 departmental assignments (faculty assigned as a liaison with the College Outcomes Committee representative from your area):

V. Evaluation of past assessment activities in terms of the college's adopted definition of authentic assessment (e.g., review the use of uniform assessment or diverse assessments, and how those assessments are written for a discipline):

VI. Evaluation of past action plans (i.e., how past action plans have helped with gains in student achievement of outcomes)

To further strengthen the SLO assessment process, the College Outcomes Committee is revising the SLO addendum to incorporate the authentic assessment definition. Additionally, the inclusion of the SLO coordinator in the curriculum approval process should provide additional guidance in the linkage of student learning outcomes to the course outline of record. (2.004)

Furthermore, in achieving goals of the Strategic Master Plan, in particular objective 5b Ensure active learning and applied knowledge and skills are examined through authentic assessment); the Annual Program Plan is the document which ties assessment and planning to resource allocation.

The College Outcomes Committee is active in the annual review and evaluation of the General Education Learning Outcomes (GELO) (2.005, 2.006), which serve also as the institutional learning outcomes, and provides oversight on discipline-level outcomes.

An excerpt from the GELO report:

Appendix 2: Samples of Authentic Assessment Departmental Discussion Results

Life Sciences

I.

Summary of departmental discussion on authentic assessment 8/22/13 The Life Sciences department is generally satisfied with the definition of authentic assessment as adopted at the 2013 leadership retreat. We discussed how many of our courses directly prepare students for biology-related careers. The biology major courses give students the skills needed to work in laboratories, to be successful in the field, or to prepare students for additional studies in biology or medicine. The anatomy, microbiology and physiology courses train students who will go on to become allied health professionals such as nurses. The critical thinking skills taught in our non-majors courses such as introductory biology help our students become productive citizens and consumers as they interpret biology information presented by the mass media and in real world settings such as a courtroom.

The Life Sciences department discussed several ways in which authentic assessment is used to evaluate our courses, and we generated new assessment ideas as well. In introductory biology, we assess several important skills, including the ability of a student to use a microscope, and the ability of a student to take data and create a meaningful graph. In physiology, we require students to interpret data presented in graph form, such as a hemoglobin dissociation curve. In microbiology, we assess the ability of the student to isolate bacteria using a streak plate method (a standard lab technique), and in doing so, train the student to properly label the petri plate and properly handle a sample of bacteria. All of these skills are directly relevant to hospital work. In many of our classes, faculty require students to read biology articles from the mass media or listen to guest speakers or read case studies, followed by a written analysis or group discussion. The students then demonstrate that they can pull relevant biology information from these sources while evaluating the quality of the research in the source by addressing what was left out of a research study, if the study was done properly, and other questions about the research.

Also noted in the College Outcomes Committee report:

The College Outcomes Committee is currently, and has plans to continue, following up on the results of both the GELO and authentic assessment reviews and evaluations. These follow-ups include action plans for reviewing the next assessment cycle. In addition, the committee is working toward further incorporating Service Area Outcomes (SAOs) into the institution's outcomes work.

Additionally, the College Outcomes Committee coordinated a Pierce College Assessment Day in November of 2013. (2.007) This biannual event provides opportunity for discussion of assessment across disciplines. Faculty share their findings and compare notes on assessment results and methods of assessment. The Academic Senate in partnership with the College Outcomes Committee has scheduled additional workshops for the spring of 2014. (2.008)

Appendices

R2.000 Leadership Retreat Presentation
R2.001 Leadership Retreat Agenda
R2.002 Authentic Assessment worksheet
R2.003 College Convocation and Professional Development Day
R2.004 Senate minutes 12/09/13 – SLO coordinator and Curriculum
R2.005 GELO report
R2.006 Senate Minutes 10/21/13 outcomes report
R2.007 College Workshop Assessment Date flyer
R2.008 College Outcome Committee Agenda Spring Assessment Date

Recommendation 3

In order to fully comply with the Standard, the College should fully develop, implement, and assess internal control mechanisms for the expenditures of grants and specified funds including the Associated Student Organization trust accounts and the Foundation to ensure these activities align with the mission and goals of the college. (III.D.2.d; III.D.2.e)

1. Internal control mechanisms for the expenditures of grants to be administratively managed to ensure alignment with the College mission and goals.

Pierce College is developing several internal controls for expenditure of grants to ensure alignment with the College mission and goals. Administrative Regulations of the Los Angeles Community College District (LACCD) AO-16 and AO-17 regulate how grants, bequests, trusts, donations, and gifts will be accepted from both District and college auxiliary organizations. (3.001, 3.002)

The Business Office and Accounting Policies and Procedures Manual issued in 2012, contains specific instructions and procedures for grant expenditures. (3.003) This includes references to direct payment transactions and setup of grants. The College is currently revising the grant application to include participatory governance bodies to ensure proper sequence of process and alignment with the College's Strategic Master Plan. (3.004) Currently, the vice president of Administrative Services and the Budget Committee provide oversight and assessment of expenditures through the review of quarterly reports. Furthermore, grant expenditures require the signatures of both the vice president of Administrative Services and the president of Pierce College. A flow chart has been designed to clarify responsible parties and the sequence of approvals from the initiation of the grant through senior staff approval. (3.005)

Additionally, the Grants Committee, which is a sub-committee of the Educational Planning Committee and reports to the Academic Senate, is developing a Grants Handbook that will be a resource for applicants and provide guidance through the process. Furthermore, Pierce College is committed to filling the position of an associate dean of grants to provide additional oversight, ensure compliance with grant objectives, as well as assurances of a grants alignment with the College's mission and goals.

Grants that originate through the Pierce College Foundation follow a similar process. The Foundation convenes a finance committee, prepares and forwards the grant request along with a statement reflecting that the grant aligns with both the Foundation's and College's mission and goals to the Foundation Board. Final approval resides with the College president.

Beginning January 2013, the Business Office has been tasked with administering grant expenditures to ensure compliance with the Administrative Regulations of the Los Angeles Community College District. (3.006)

2. Internal controls for expenditure of Associated Students Organization (ASO)/College trust accounts to be administratively managed to ensure alignment with the College mission and goals.

LACCD Administrative Regulations S-2, S-3, S-4, S-5, regulate and define management of Associated Student Organization funds. Non ASO trust funds are regulated by Administrative Regulation AO-14. (3.007 3.008 3.009 3.010 3.011)

The 2012 *Business Office and Accounting Policies and Procedures Manual* contains specific instructions and procedures on how ASO trust fund accounts (pp.49 - 50), and non ASO trust accounts and expenditures are conducted and managed. The College adopted a new trust account application in March 2013 for creation of trust accounts in the Business Office. This form is actively being used and will be modified to reflect alignment with the College's mission and new strategic goals. The ASO trust expenditure document is being reviewed and will also be modified to reflect alignment with the College's mission and new strategic goals. (3.012 3.013)

Recommended changes to applications, forms, and other documents are discussed broadly among several participatory governance committees, including the Pierce College Council, Budget Committee, ASO officers, ASO advisors, ASO club presidents and Department Council to ensure alignment with the College's mission and strategic goals. Implementation is scheduled for spring of 2014. Training for end users, including ASO officers, ASO advisors, ASO club presidents, and Department Council (Non-ASO Trust accounts) is scheduled for February 2014.

3. Internal controls for expenditure of funds from the Pierce College Foundation are administratively managed to ensure alignment with both the Foundation's and College's mission and goals.

The new *Foundation Accounting Policies and Procedures Manual* (3.014) developed with consultation from the vice president of Administrative Services and the associate vice president of Administrative Services contains specific instructions and procedures regarding Foundation expenditures. Pages 13 and 14 of the manual state the following:

The Foundation makes several different types of expenditures in carrying out its operations. The Board of the Foundation has primary responsibility for ensuring that there is accountability for all disbursements made.

.....The College president does not direct specific disbursements but is responsible for ensuring that the overall system for disbursing funds is sufficiently controlled.

Some of the disbursements that the Foundation may make include:

- Purchase of supplies and equipment
- Purchase of professional services
- Payment for Instructional Educational Grant Awards
- Payment for scholarships
- Rental of equipment or facilities
- Making reimbursements to employees

- Paying for travel
- Payroll
- Reimbursements to the College or District
- Payment of credit card bills

To ensure that disbursements are authorized and made within approved guidelines the Foundation shall follow the specific procedures outlined, obtain required approvals and use predesigned disbursement forms. The forms facilitate the processing of transactions and provide documentation that the transaction was completed as intended

The Foundation shall use a uniform Request for Funds (RFF) form in order to document authorization and ensure proper accounting for disbursements. The RFF form shall indicate to whom the check will be made payable, a description of items or services received or a reason for the disbursement. Original receipts shall be attached if the check is for a reimbursement. The RFF will also provide the account to be charged.

District Board Rules define the responsibilities of the college president and the vice president of Administrative Services regarding oversight of auxiliary organizations, including the College Foundation. Specific audit and oversight responsibilities of the college president are defined in the Board Rules Chapter XIII, Article I, Sections 13106 and 13109.12. The roles and responsibilities of the vice president of Administrative Services are defined in Chapter XIII, Article I, Sections 13107 and 13109.12. (3.014a)

To ensure alignment with College goals, the president of Pierce College has stated responsibilities and functions on page seven in the *Foundation Accounting Policies and Procedures Manual*:

- 1. Primary liaison for bringing the goals of the College to the Foundation for the purpose of developing mutual programs.
- 2. Responsible for reviewing the overall goals, budget and finances of the Foundation to ensure that the organization is operating within the general scope of its intended purpose. Confers with Foundation if there are any issues or concerns about the overall plans or operations.
- 3. Serves on the Board of the Foundation as a non-voting ex officio member

The Foundation procedures and processes continue to be standardized resulting in similar forms used both by the College and the Foundation. In addition, a "process flow matrix" will be created to clarify the process and appropriate procedures for grant applicants and recipients. The College's vice president of Administrative Services approves all funds expended by the Foundation.

4. Internal cash controls for collection and distribution of funds on the campus need to be administratively managed.

Administrative Services introduced the *Policy and Procedure Guide for Fundraising* (3.015) which was approved by administration and introduced to the management team, participatory governance bodies, department chairs, and other end users in early spring of 2013. The *Policy and Procedure Guide for Fundraising* directs users to fundraising applications (3.016) and other related documents which are posted on the Pierce College website. Throughout the spring of 2013 and again in fall of 2013, associate vice presidents and deans met with department chairs to discuss the policies and procedures. Questionnaire forms (3.017 3.018) were created allowing various users and review teams to better understand current practices. Follow-up discussions with department chairs and program managers regarding best management practices have led to improved cash management procedures at the program level. Additionally, two workshops were held in the fall of 2013 to review forms and understand the sequence of process and procedure. (3.019)

As addressed earlier, LACCD Administrative Regulations provide definition and scope to College procedures. LACCD Administrative Regulations B-12 (3.020) specifies cash /check directives.

The *Business Office and Accounting Policies and Procedures Manual* issued in 2012 contains specific instructions and procedures on internal cash controls including how they will be managed. Both the Foundation and the Business Office manage and provide administrative oversight for internal cash controls and trust fund accounts within their respective areas.

Appendices

- R3.001 Administrative Regulations AO-16
- R3.002 Administrative Regulations AO-17
- R3.003 Business Office and Accounting Policies and Procedures Manual
- R3.004 Grant application Form
- R3.005 Grant Process Flow Chart
- R3.006 Business Office Grant Set Up Support Activities College
- R3.007 Administrative Regulation S-2
- R3.008 Administrative Regulation S-3
- R3.009 Administrative Regulation S-4
- R3.010 Administrative Regulation S-5
- R3.011 Administrative Regulation AO-14
- R3.012 The 2012 Business Office and Accounting Policies and Procedures manual
- R3.013 Trust Account Application
- R3.014 Foundation Accounting and Procedures manual
- R3.014a LACCD Board Rules Chapter XIII
- R3.015 Policy and Procedure Guide for Fundraising
- R3.016 Fundraising Applications

- R3.017 Questionnaire Forms
- R3.018 Cash Management Matrix
- R3.019 Cash Management Procedure GuideR3.020 LACCD Administrative Regulations B-12