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*C a l i f o r n i a
C o m m u n i t y
C o l l e g e
I n d e p e n d e n t s*

June 5, 2013

CCCI-

Bob Bezemek just submitted the attached complaint/response to the Department of Education regarding ACCJC's reply to the original CFT complaint. With this ongoing legal challenge and CCCI's legislative audit request, pressure is mounting on the Commission.

Rich

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SENT VIA E-Mail to kay.gilcher@ed.gov and Federal Express

June 4, 2013

Kay Gilcher, Director of the Accreditation Division
Office of Postsecondary Education
US Department of Education
1990 K Street NW
Washington, DC 20006

**Re: Complaint Against the Accrediting Commission of Community and
Junior Colleges for Not Responding to a Complaint as Required by
34 CFR § 602.23(c)**

Dear Director Gilcher:

We write on behalf of the California Federation of Teachers, AFT, AFL-CIO, AFT Local 2121, and others referred to below. This constitutes a Complaint filed with the Department of Education in connection with the failure of the Accrediting Commission for Community and Junior Colleges (ACCJC) to investigate and respond to a complaint filed with it, in the manner required by 34 CFR section 602.23(c).

On April 30, 2013 the California Federation of Teachers, AFT, AFL-CIO, AFT Local 2121, and nine present and past officers of CFT, AFT Local 2121 and the CFT's Community College Council filed two copies of a 280-page long Complaint and Third Party Comment, and supporting attachments of 847 pages, with the ACCJC (the "April 30th Complaint"). A copy was also submitted to the US Department of Education, along with the supporting evidence. The April 30th Complaint raises serious issues about the ACCJC's compliance with its policies and law, the impartiality and integrity of the Commission, and its reliability for Federal accreditation purposes. The April 30th Complaint is directed not only at ACCJC's assessment of City College of San Francisco issued July 2012, but also its treatment of all California community colleges.

ACCJC responded to the April 30th Complaint with the attached 7-page long "Report" dated May 30, 2013. (**Attachment 1**) ACCJC's Report is incomplete and lacks sufficient detail to indicate that the ACCJC conducted a fair, equitable and unbiased investigation and processing of the April 30th Complaint, as required by 34 CFR section 602.23(c). To the contrary, the perfunctory response declares that most of the allegations are not being addressed, and not a scintilla of documentary evidence was attached or referenced to support the ACCJC's assertion that it actually reviewed and investigated the allegations.

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I. A Perfunctory, Incomplete, Untimely and Biased Report by ACCJC

When ACCJC announced on May 30, 2013 that it had conducted its own investigation of the Complaint against it, Complainants had no reason to expect anything besides a rejection given the nature and scope of the allegations documented in the Complaint. Still, ACCJC's response is particularly contemptuous of its legal obligations. Federal law demands that the Commission "review in a timely, fair and equitable manner, and apply unbiased judgment, to any complaints against itself ..." 34 CFR § 602.23(c) ACCJC violates each of these standards.

Not an Unbiased Review. First, the review is especially biased, even for an organization that is investigating itself. ACCJC's Report notes that a complaint against the Commission "is ordinarily considered by the ACCJC's President", but because the Complaint "makes allegations about the President" it had "appointed the members of the Executive Committee ... to consider the issues contained in the Complaint and prepare this report." Yet this Committee includes Commissioners who, like the President, are the subject of Complainants' accusations.

No one signed the Report, but we assume the "Executive Committee" declared to be responsible for the Report consists of those individuals serving in the positions identified as the Executive Committee in the ACCJC's Bylaws. (**Attachment 2**) The Commission's failure to have its Executive Committee actually sign the Report, or signify the identity of those who purportedly issued it, seems to conflict with the Federal requirement of a fair review by, for instance, not allowing us to fully examine the conflicts which may exist for signatories.

According to the Commission's Bylaws, its Chair (Sherrill Amador) serves as **chair of the Executive Committee**,¹ and the other members of the Executive Committee are apparently its **Vice-Chair Steven Kinsella**,² the **Chair of the Budget and Personnel Committee (who is believed to be Frank Gornick)**,³ and apparently the former ACCJC Chair Michael Rota.⁴ The

¹ See Bylaws, Art. VII, Section 2, Article VIII (**Attachment 2**)

² *Id.* See ACCJC Newsletter dated Spring 2013, p. 2, attached as **Attachment 3**.

³ *Id.* See attached Agenda from the ACCJC's Meeting of January 9, 2013, suggesting Mr. Gornick's service as Chair of the Budget and Personnel Committee. (**Attachment 4**) We are unable to locate any other evidence of the chair of ACCJC Budget and Personnel Committee.

⁴ See Bylaws, Art. VIII (**Attachment 2**) We were unable to locate any documents identifying the "former" chair serving on the Executive Committee, but assume it is Mr. Rota.

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Executive Committee serves as “council to the president” and presumably was directly involved in approving many of the policies and actions which are the subject of the April 30, 2013 Complaint to ACCJC. Once the identity of the signatories is confirmed, we may find it appropriate to amend this Complaint. So far, ACCJC has *refused* to identify the signatories.

Mr. Kinsella and Mr. Gornick are alleged in the April 30th Complaint to have disqualifying conflicts of interest in regard to the Commission’s reliance on GASB 45 and OPEB prefunding as an assessment criteria. Both are alleged to have served at various times as board members of a Retiree Health Benefits Joint Powers Authority “trust.” This trust collected prefunded contributions from some community colleges which were accredited by ACCJC. At times Mr. Kinsella or Mr. Gornick served as chairs or members of ACCJC evaluation teams which reviewed colleges to evaluate their prefunding of estimated OPEB liabilities. Evidence of their activities involving allegedly conflicting dual roles (e.g. evaluation team member or chair, ACCJC Commissioner or task force member, and JPA founder, board member, etc.) is set forth in the April 30th Complaint. (See pp. 124 - 167)

Further, as mentioned, Mr. Rota and Ms. Amador served as Commission Chair when many of the actions challenged in the Complaint occurred. In view of the above, one can scarcely imagine any ACCJC “group” more biased to “investigate” the accusations contained in the April 30th Complaint than the Executive Committee.

Then there is the baffling claim by the Commission that it appointed the Executive Committee rather than President Beno, to “consider the issues,” because there were allegations against the President, clearly implying that the President was *recused* from participation in the preparation and determinations in the Report. Yet when one clicks on the “ACCJC Response to CFT Complaint” link on the ACCJC website, what comes up is a copy of the Report which is labeled at the top of the first page as being “**drafted by BB**”, which suggests Barbara Beno:

Complaint analysis drafted by BB (00069195).DOC -
Report_on_CFT_Complaint_05_30_2013.PDF (**Attachment 1**, hereto, emphasis added)

A copy of the Commission’s internet version of the Report, containing the title “Complaint analysis drafted by BB,” is attached as **Attachment 5**. The only member of the Commission or its staff known to have the initials BB is the supposedly-recused Barbara Beno.

If an “analysis draft” by Ms. Beno was converted into the Executive Committee’s Report, a logical deduction, then it is natural to question the credibility of the assertion on page one of the Report that she was recused, and to further doubt the integrity of those claiming responsibility for

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the Report. Of course the April 30th Complaint already presents serious questions of Commission integrity through allegations of a Commission rife with serious conflicts of interest. These conflicts are, as is evident from the Complaint, plainly visible in the public record of ACCJC activities. The “complaint analysis drafted by BB” notation thus suggests that the Commission allowed Ms. Beno to analyze and decide whether conflicts of interests involving herself were valid or not. Such action would hardly satisfy the Federal regulation.

ACCJC should be required to address this issue, along with responding to the April 30th Complaint in a fair, equitable and complete manner.

An untimely response. As to the numerous allegations perfunctorily dismissed without discussion, or even acknowledgment, the Reply is untimely.

We next discuss the fact that the Reply fails to address most of the allegations of the April 30th Complaint, and is inadequate as to what it does address.

II. An Unfair and Inadequate Review

The Commission’s review of the Complaint is supposed to be fair and equitable. It fails these requirements. The ACCJC Complaint Policy plainly implies that the Commission will not only respond to a Complaint, but will **investigate** it. The ACCJC Policy on Complaints provides that the “President ... responds to each complaint ... within 30 days of receipt ... if more time ... is required **to complete an investigation**, the complainant is notified ...” In order to satisfy the Federal standard of fairness and equitability, an investigation of the Complaint’s accusations is essential. Yet the Report is bereft of any detail about how the Executive Committee arrived at their conclusions, and offers no indication whatsoever of any investigation. To the contrary, it makes reference to “reviewing the Complaint” and to “issues” that merit the Commission’s “attention and reflection.”

No details of any supposed investigation are delineated. Did the Executive Committee interview anyone in regard to the few allegations it bothered to consider, or any other ones? There is no indication. As to issues which involve specific documents, such as the inference that an “action recommendation” document was properly prepared, **no such documents** are attached, and as we show, more than one issue is misstated. In fact, as noted earlier, there is no evidence in the Report that any documents were reviewed or obtained by the Committee, or that any witnesses were questioned in regard to the April 30th Complaint.

Accordingly, the ACCJC’s response fails to comply with the Commission’s own Policy on Complaints, and with 34 CFR section 602.23(c).

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III. The Report Fails to Address Important Aspects of the Complaint/Comment and Wrongly Refuses to Treat it as a Third Party Comment, in Violation of its Policies and Federal Law

The Report takes a perfunctorily dismissive approach to most of the Complaint and Comment.

First, it flat-out refuses to address the many serious allegations that the Commission violated and continues to violate fundamental Federal regulations in regard to ACCJC's evaluation of CCSF and generally all of the community colleges. ACCJC's excuse is that "this is not a court of law." This is no justification for failing to respond to the Complaint. The applicable Federal regulations set forth Standards which ACCJC has extensive experience with, and is required to satisfy. For it to claim that it is unable to indicate whether it complies with these Standards strongly indicates the Commission lacks the necessary reliability and integrity to serve as an accreditor charged by the Federal government with assessing these Standards.

ACCJC performs an important public function. It is paid nearly \$3 million annually by the People of the State of California for this function, and it is expected to fairly evaluate California community colleges in regard to their satisfaction of Standards of performance, and in compliance with Federal requirements. The ACCJC is not some ordinary, non-profit voluntary organization. Rather, it is named by the Community Colleges, in state law, as their accreditor. The Federal government has given ACCJC monopolistic Federal power to determine access by higher education institutions to Federal monies for students and colleges alike. The Federal government relies on ACCJC as a gate-keeper to Federal education funding. ACCJC thus wields decisive power over California's public community college system. It cannot just refuse to respond to and investigate accusations that it is violating the very laws (and hence Standards) it is required to follow and implement.

Second, the Commission dismisses accusations that some of its policies violate the law on the grounds that they are "developed in consultation with and periodically reviewed by ACCJC's legal counsel," and it has "no reason to believe [they] are not fully in accordance with all applicable legal requirements." Based on this generality, it did not address allegations that its policies, Standards and actions violate numerous Federal regulatory requirements. In other words, it just ignored these criterion. These include:

*** It must have effective controls against conflicts of interest in the accreditation process - 34 CFR §602.15(a)(6).** Yet we allege that it has allowed conflicts which compromise the independence of evaluation teams, lobbying which opposes the interests of some community colleges, and its demand that colleges prefund GASB 45-identified OPEB contributions.

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*** It adopts and applies standards which are “widely accepted” by other accrediting bodies and educators - 34 CFR § 602.13.** Yet we allege its OPEB prefunding standard and harsh censorship of governing board members is not widely accepted.

*** It must avoid the inconsistent application of its Standards - 34 CFR § 602.18(b).** We allege that in its treatment of reserves, grants, OPEB and compensation as a percent of budget, ACCJC has been inconsistent. We allege ACCJC respects State law when it fits with ACCJC’s ideology, but rejects State law when it does not.

*** It must “clearly identify” any deficiencies in its reports - 34 CFR 602.18.** We allege it failed to do so in the case of CCSF.

*** It must assure that the constituencies represented at a college have an opportunity to participate meaningfully in the evaluation of colleges - 34 CFR § 602.21(b)(4).** We allege ACCJC disproportionally includes administrators and disproportionately excludes faculty.

*** It must assure that its Standards for “resources” are a fair measure of institutional strength and stability - 34 CFR § 602.19(b).** We allege this is not the case.

*** It is required to be “separate and independent, both administratively and financially, of any related, associated or affiliated trade association” - 20 USC § 1099b(a)(3)(C).** We allege this is not the case.

*** It is required to base its decisions on clear and published Standards which are set forth in written materials for the benefit of colleges, students and the public - 20 USC § 1099b(a)(6)(A)(i); 34 CFR § 602.18(a); 34 CFR § 602.20.** We allege ACCJC arbitrarily enforces underground, unpublished standards.

*** It must maintain a systematic program of review that “demonstrates that its standards are adequate to evaluate the quality of education ... provided ... and ... relevant to the education and training needs of students - 34 CFR § 602.21(a).** We allege its assessments are diametrically opposed to objective measures of Student Success.

*** It is required by Federal law to “consistently apply and enforce standards” which “respect the stated mission of the institution ...” - 20 USC § 1099b(a)(4)(A); 34 CFR § 602.18.** We allege it tried to legislative change the mission of California’s community colleges.

*** It is required to enforce standards that ensure that the education offered is of**

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sufficient quality to “achieve its stated objective for the duration of any accreditation period ... granted by the agency” - 34 CFR § 602.18, 34 CFR § 602.18 (a),(b). We allege it applies its “OPEB” and GASB 45 Standard to 30-year financial projections.

Relying on the undisclosed legal opinions of the Commission’s lawyer for undisclosed policies is hardly a fair or equitable response, and proves nothing about the validity of ACCJC’s policies or Standards. The April 30th Complaint identified several ACCJC policies which are alleged to violate the regulations and Standards adopted by the Department of Education, Federal common law due process, and California common law fair procedure. Some of the issues raised include an absence of due process or fair procedure which prejudiced ACCJC’s assessment of CCSF, and apply more generally to all of its assessments. (See April 30th Complaint, especially at pages 107 - 124, 157 - 160, 193 - 208)

We allege ACCJC creates or tolerates conflicts of interest, disregards its own procedures, adopts standards that are not widely accepted, applies “standards” that are not published, disregards public policy as expressed in law, does not tolerate diverse approaches within the community colleges, or devotes great effort to implementing its philosophy as to discretionary operations of colleges, and mostly ignores outcomes. (Complaint, p. 264)

Foremost, we allege ACCJC judges institutions on criteria that go much farther than measuring how effective the colleges are at serving their students and providing quality, affordable education. The variables they have focused on betray an application of standards that promotes an ideological agenda inconsistent with the public policy of California, and the mission of the community colleges. ACCJC punishes colleges which fail to fall in line. (Complaint, p. 264)

The Complaint illustrated that CCSF is among the top California colleges in objective measures of student success, such as *transfer velocity*, the *average GPAs of their transfer students in the California State University System*, *completion rate for college prepared students*, *completion rate for college unprepared students*, and *total completion rate*. (See Complaint, p. 265, and Attachment 2.B.) Thus, CCSF is in the top 12% in transfer velocity, above average in transfer GPA, in the top 3% in completion rate for college-unprepared students, and in the 83rd percentile of all community colleges in total completion rates. CCSF is among the top 21 colleges in being above average in these objective measures. (Complaint, pp. 265-266)

The Complaint alleges that of the 39 California community colleges that have not been sanctioned in the last 10 years, student performance, completion rates and learning are not linked to the Commission’s opinion as to how well these colleges are being run. Indeed, 6 of these

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colleges are below average in every single objective category, and an additional 11 are below average in 4 out of 5 categories. (Complaint, p. 267)

As is evidenced by the information and tables included in Section XI of the April 30th Complaint, we allege that ACCJC's Standards and criteria, as applied and in some cases on their face, are not reliably related to academic excellence and help explain the disproportionate sanctions issued by the ACCJC to California community colleges. No undisclosed review by the District's lawyers can show that they are reliable measures of college performance as required by 34 CFR §§ 602.16(a) and 602.13, and the accreditation scheme enacted by Congress and enforced by this agency.

In failing to address these allegations, the ACCJC violates the Federal requirement that it respond to **every complaint**. The Higher Education Act of 1992 requires ACCJC to look not only at whether its policies are "adequate on paper." It must do that too. But fundamentally it must also examine **whether its policies, as applied, and its actions, satisfy Federal requirements**. This obligation is totally ignored in the Report.

Third, ACCJC is wrong in rejecting outright the Third Party Comment on grounds it is not a legitimate Comment. The Report declares that a Comment is a process for persons with "concerns about an educational institution" to "express those concerns without going through the formalities of filing a complaint about the institution." In other words, in ACCJC's view, only comments which express *negative concerns* about a college will be accepted as Third Party Comments. This is at odds with the law. Federal law specifies that ACCJC "must provide an opportunity for third-party comment concerning the institution's ... qualifications for accreditation." 34 CFR § 602.23(b). This is precisely what CFT's Comment provides.

The Comment filed by CFT *et al.* explains why CCSF should be fully accredited, and why the Commission's Show Cause sanction was unwarranted. The Comment also references objective statistics not mentioned by ACCJC which rank CCSF high in the accepted, objective measures of Student Success. It shows, *inter alia*, that CCSF's estimated OPEB liabilities cannot be considered in assessing its fiscal stability, that CCSF satisfies State law in regard to reserves, that CCSF's grants cannot be treated negatively because they are beneficial and comparable to other institutions. And it shows that CCSF's conduct used by ACCJC to justify Show Cause was inconsistently viewed as warranting accreditation or less sanctions in other colleges' reviews. In other words, the Comment identifies ACCJC's errors and arbitrariness in assessing CCSF's qualifications for accreditation, and discusses why CCSF is qualified for accreditation.

A Third Party Comment revealing that previous criticism of the institution by the ACCJC was improper, because it violated legal requirements, comes within this broad Federal

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standard. In refusing to also accept CFT's submission as a Third Party Comment, ACCJC deprives the its own Commission of relevant information supplied by CFT and AFT 2121, and thus violates both its own policy and 34 CFR 602.602.23(b).

Fourth, it is not simply "worth noting" by ACCJC that the comment was filed *solely* by members of the public, and their representative, and the representative of more than 2,000 CCSF employees, *as opposed to "CCSF" trustees or high-level administrators*. Denigrating the faculty's Complaint does not serve to justify rejection of the Complaint. These 2,000 faculty speak, through their representatives, with as much weight, if not more, as the interim CEO or CCSF's trustees. And the fear sown by ACCJC among administrators and trustees, which discourages these colleges' representatives from sticking up for their institutions, is well known in California, documented not only by CFT and Marty Hittelman, but in countless news articles, and the report of the non-partisan RP Group. The 2011 RP Group Report *Focusing Accreditation on Quality Improvement*, noted:

" [Colleges C and D] described the commission as not being receptive to constructive criticism and not encouraging feedback from the colleges and expressed concerns about retaliation." (p.76)

and,

"People are very fearful to give open, honest feedback for fear of retribution. There is a perception that if you go on record with criticism, that it could come back to haunt you. Very few campuses are going on the record with concerns." *Ibid*.

IV. Specific "Findings" of the "Executive Committee"

Even in the five aspects of the Complaint which it discusses, ACCJC fails to conduct a fair and equitable review.

A. Mischaracterization of Suggestions to Improve as Deficiencies

The Committee's Response to this part of the Complaint is infused with more mischaracterizations, downright errors and a failure to address a central thesis of the April 30th Complaint.

The 2006 ACCJC action found that CCSF satisfied every Standard, not "sufficient numbers of standards." The 2006 Report made suggestions to improve - it did not demand "corrective action." But the July 20, 2012 action letter said "Show Cause" was ordered because

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the college “failed to implement the eight recommendations of the 2006 evaluation team ...”

Nowhere in the Report does it defend against a central thesis of the Complaint, that the Commission, without benefit of policy, has increasingly demanded that the failure to follow suggestions constitutes a deficiency, and that in the case of CCSF the Commission expressly recharacterized CCSF as being deficient between 2006 and 2012, because it failed to implement suggestions to improve, which are not requirements.

The 2006 ACCJC action letter from Ms. Beno which reaffirmed accreditation, required that the college complete a “Progress Report” in 2007. The letter stated that the progress report should focus on “resolution” of three recommendations - #4 (financial planning and stability), #2 (planning and assessment), and #3 (student learning outcomes).

If this was meant to convey that the recommendations had to be followed, it violated ACCJC policy and Federal regulations requiring clarity, as alleged in the Complaint. In any event, CCSF apparently satisfied the ACCJC as there was no further mention of recommendations #2 until 2012, and #3 was not mentioned after 2009. As to #4, this is the OPEB/GASB 45 recommendation, which the April 30th Complaint alleges was an improper criteria.

The Report states that when the Commission accepted CCSF’s Progress Report *in 2007* it then “required” that CCSF submit a Focused Midterm Report in 2009 addressing progress toward all 8 of the 2006 recommendations. This is not accurate. A Midterm Report, as was mentioned in 2006, is required of all colleges whose accreditation is renewed:

“All colleges are required to file a Midterm Report in the third year after each comprehensive evaluation. Midterm Reports indicate progress toward meeting all of the evaluation team’s recommendations ... The Focused Midterm Report is a midterm report which must give evidence of progress on recommendations selected for emphasis by the Commission. City College ... should submit the Focused Midterm Report by March 15 2009.” (Beno to Day, June 29, 2006)

Furthermore, the evidence shows that the March 2012 visiting team discussed warning and probation during its visit, that the team chair apparently recommended probation, but that the Commission, contrary to its policy, did not obtain a signed team recommendation for action from the team, and that the Commission then imposed a Show Cause sanction. Except for a disingenuous response (discussed below) the Report does not discuss these allegations.

The ACCJC’s assertion that many of the areas which were noted only as

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“recommendations” in the 2006 Report” had “become serious deficiencies” in 2012 is belied by the evidence recited in the Complaint, and to the Commission’s reliance on improper criteria, arbitrary application of Standards, or lack of substantial evidence.

B. Conflict of Interest of Peter Crabtree

The ACCJC Reply dismisses the allegation that a conflict of interest involving the spousal relationship between ACCJC President Barbara Beno and her husband, CCSF evaluation team member Peter Crabtree, compromised the role of the visiting team as being, and appearing to be, independent of the Commission. ACCJC does this by ignoring the evidence, policies and law, focusing on peripheral matters, and not addressing the core indicators of a conflict within the totality of circumstances present.

First, ACCJC argues that Mr. Crabtree was a proper selection for the CCSF review - but whether he possessed skills relevant to the visit is *irrelevant* to and does not address whether there was an actual or apparent conflict. The claimed reason for his appointment to the visiting team - his expertise in vocational education - is only relevant to whether there was an improper *motive* in his assignment, *not* whether there was a conflict. As to this separate issue of motive, since there are scores of faculty and administrators working or administering in the subject areas of career or vocational education in the California community colleges, ACCJC’s claim that his particular “expertise” motivated his assignment is questionable on its face. Note that *no details* were provided about the Commission’s selection of reviewers with vocational education experience for the more than 25 evaluation teams conducting assessments during Spring 2012, the date *when Mr. Crabtree was appointed* to be on the team, whether he was *in the ACCJC data base of available reviewers* from 2006 until 2012, or about the number of *other prospective team members* in the Commission’s extensive database with “expertise” in vocational education. Why wasn’t such information, or that data base list cited and presented with the Report? Why were other relevant facts entirely ignored?

The Complaint alleges that Mr. Crabtree had served, before the March 2012 evaluation of CCSF, on *just one California community college evaluation team* - 10 years earlier, in 2002, in regard to San Joaquin-Delta evaluation. Mr. Crabtree had served on an accreditation team in 2004 for Kapi’olani College in Hawaii, and in 2006 for now defunct, private Brooks College. This is hardly a resume of extraordinary experience. The April 30th Complaint alleges as much - the Reply *does not even mention these facts*.

Ms. Beno presumptively did select Mr. Crabtree for the CCSF evaluation team because she oversees the Commission’s staff, including Vice President Jack Pond, and the entire appointment process. This is confirmed by her October 4, 2010 memo to CEO’s in which she

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recruits evaluation team candidates. (**Attachment 6**) Whether the idea to appoint Crabtree came from Ms. Beno or her vice president or someone else is irrelevant. By virtue of her position as President, she supervises team selection, she can approve or disapprove appointments, and she solicits the list of eligible team members for the ACCJC data base (See **Attachment 6**).

Second, the existence of personal relationships between the ACCJC staff or Commission, and a team member, constitutes a conflict in the context of a so-called *independent* evaluation “team” - both in actuality and in appearance. That the Commission never previously “viewed” a spouse of a Commission executive as such, even if true, is not a defense. How many prior such relationships have occurred - besides the three earlier occasions when Mr. Crabtree was selected for teams (in 2002, 2004 and 2006)? What prior opinions, if any, were previously obtained by the Commission in regard to the propriety of such a situation, if it arose before? And how can the Commission justify such an appointment given the repeated emphasis on avoiding conflicts, or their appearance, in the Commission’s policies and Manuals? None of these issues or relevant facts are discussed in the “Report.”

The reality is that the conflict resulting from Mr. Crabtree’s appointment has been readily identified by many educators - administrators, trustees and faculty - since it was pointed out by CFT - who have expressed dismay at the appointment of Mr Crabtree. In view of the earlier alleged conflict arising over Mr. Crabtree’s alleged distribution of confidential commission information (discussed at length in the April 30th Complaint), it is impossible to reconcile Crabtree’s appointment with the many Commission policies against the appearance of a conflict of interest.

That Ms. Beno and Mr. Crabtree had “no prior relationship” - as emphasized in the Reply - with CCSF would, if it were the case, be irrelevant, as it is the relationship between the two of them which creates the conflict, since the evaluation team is expected to be independent of the Commission. As the Complaint explains, however, Barbara Beno *does have a prior relationship with CCSF - she authored the accreditor’s letters to CCSF issued in 2006, 2007, 2009 and 2010*, which the team, including her husband Peter Crabtree, received and read to prepare for the visit, and which they cited in their evaluation Report. The Complaint alleged the uncontroverted fact that Mr. Crabtree, as a member of the 2012 Evaluation Team, **was responsible for reading, interpreting and relying on the contents of the four letters written by his wife** in 2006, 2007, 2009 and 2010, in the context of CCSF’s response to recommendations from ACCJC. And it alleges he had a significant role in the evaluation. The Report ignores this.

The Report thus does not deny Mr. Crabtree’s extensive role in the evaluation of CCSF which is outlined in the April 30th Complaint, and disregards the legal doctrine that through this conflict of interest, Ms. Beno was putatively a member of the evaluation team, and concurrently

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involved in the Commission's decision to sanction CCSF - she sat with the Commission when it decided, and she wrote the action letter of July 2012.

State law recognizes that a worker should not be in a position to evaluate a spouse, yet here Mr. Crabtree was placed in such a position - to determine how to interpret those action and follow-up letters in the context of the accreditation criteria. And then, after the team visit, Ms. Beno and the Commission were placed in the position of evaluating a Report in which Ms. Beno's husband had a significant contribution, one deriving from his "expertise." If Ms. Beno were still employed as a college president in Peralta, she would not be permitted to evaluate her husband, a Peralta employee. But that is, in essence, what took place in the CCSF evaluation. We allege that the relationship between the two of them prejudicially compromised the evaluation, and the Report simply neglects to confront the issue.

C. Failure to Obtain a Signed Recommendation for Action in March 2012

ACCJC disregards the allegation (See April 30th Complaint, p. 108-111) of apparent procedural error, raising questions that the March 2012 CCSF site-visit Evaluation Team was not allowed to make an action recommendation - e.g. for accreditation, warning, probation, etc.

Instead of confronting this allegation, ACCJC responds by claiming that a "confidential recommendation" was signed by all and provided to the Commission at its June 6-8, 2012 meeting. No documentation was provided in the Reply to support this assertion, and there was no effort to explain what "confidential recommendation" - whether for specific deficiencies to correct or for recommended action by the Commission - was signed by the team during the team visit in March 2012, as ACCJC Policy requires.

The site visit team normally completes two recommendations - *one for action* such as accreditation or probation - and *another for specific requirements as to curing deficiencies* in the Standards and Eligibility Requirements. Complainants do not dispute that the later recommendation was done. Rather, Complainants allege there is evidence the first - the action recommendation - was not completed. This issue is simply not discussed. If such a document was obtained from the team in March 2012, then the Commission should produce it for inspection. Saying "a recommendation" was presented to the Commission in June 2012 does not respond to the accusation.

D. Standard III.D. - Fiscal Resources

The Commission's response to the April 30th Complaint regarding its evaluation of CCSF's financial resources, similarly ignores the issues alleged by CFT. The ACCJC response

Kay Gilcher, Director, Accreditation Division
Office of Postsecondary Education
US Department of Education
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focuses on just one specific issue, out of many, alleged in the Complaint. This issue is the Commission's evaluation of long-term liabilities.

In the Complaint the long-term liability standard is addressed in the discussion of GASB 45, and is presented in over 40 pages of evidence and argument. First, the April 30th Complaint alleged that the Standard for which the Commission was citing institutions as being deficient - prefunding as supposedly required by GASB 45 - conflicted with California public policy (the position of the State community colleges). The April 30th Complaint alleges that under the broad language of the Standard, and in accordance with the longstanding public policy of California, CCSF did "adequately plan for" and "fund" its future liabilities.

Second, the Complaint alleged that ACCJC's requirement of prefunding of estimated GASB 45 liabilities was not widely accepted by educators and other accrediting bodies. The Report entirely ignores this important allegation.

Third, the Complaint alleged that there were *conflicts of interest* arising from multiple ACCJC's Commissioners and team members serving at various times on the Board of an investment consortium that benefitted financially from the application of the "GASB 45" Standard as demanded by ACCJC. This issue was also ignored in the Reply, despite its seriousness. The Commission's Reply offers no explanation or justification regarding the alleged conflict of interest that arose from ACCJC's allowing Board members of an investment pool (JPA) that benefitted from ACCJC's inaccurate interpretation of GASB 45, and interpretation of its Standards, to serve as team members or team chairs, or allowing some of those who were involved in the creation or activities of the JPA, to serve as commissioners of ACCJC, or chair the Commission's task force on the financial resources Standard, where they would be influential over Commission's policies in regard to "prefunding." No evidence was presented to refute these allegations, which appear at pages 124 - 167 of the April 30th Complaint.

And fourth, the April 30th Complaint asserted that the Commission must restrict its evaluation of institutions to the accreditation time period of six years (34 CFR §602.18), and that it does not have the authority to evaluate the hypothetical financial resources and stability of an institution, projected over 30 years. This issue too was ignored.

Despite the lengthy discussion of these issues in the April 30th Complaint, the Commission's response merely parroted back the text of the Standard, and stated that CCSF was properly found deficient. There was no justification or evidence offered as to why the Commission believes that it has the power to sanction a college for problems it deems possible to occur *30 years in the future*. There was no explanation as to why paying the full amount of the present costs of retiree health benefits each year was not sufficient "funding." There was no

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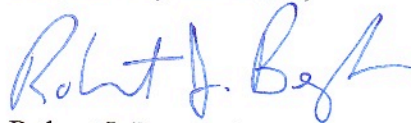
examination of the impact of this policy on current allocation of educational resources, or allocation during the period of accreditation. And there was no reasoning as to why the Commission thought that the very specific method of "pre-funding" OPEB into an "irrevocable trust" was the *only* acceptable method of planning for future liabilities under the actual text of its published Standards. Once again, the Commission's response was bereft of any detail of how it arrived at its conclusions.

In short, the Commission response completely ignored the actual substance of the allegations of the complaint, and provided no evidence of actual investigative actions in their review.

V. Conclusion

In view of the Commission's failure to respond to the April 30th Complaint as required by Federal law, we respectfully request that the Department take appropriate action to require a response from the ACCJC, and further take ACCJC's response to the Complaint and Comment into account when it considers ACCJC's application for renewal of its recognition by the Secretary.

Respectfully submitted,



Robert J. Bezemek
Counsel for Complainants California Federation of Teachers,
AFT, AFL-CIO, AFT Local 2121, *et al.*

Attachments

cc: CFT
AFT Local 2121
Signatory past and present officers

**Report of the Accrediting Commission for Community and Junior Colleges
Executive Committee**

on

**the Third Party Comment and Complaint filed on April 30, 2013 by the
Robert Bezemek law firm on behalf of:**

California Federation of Teachers, AFT, AFL-CIO AFT Local 2121

Joshua Pechthalt, President, California Federation of Teachers

Alisa Messer, President, AFT Local 2121

Jeff Freitas, Secretary-Treasurer, California Federation of Teachers

Carl Friedlander, Past President, Community College Council of the CFT

Jim Mahler, President of the Community College Council of the CFT

Chris Hanzo, Executive Director, AFT Local 2121

Gus Goldstein, Past President, AFT Local 2121

Ed Murray, Past President, AFT Local 2121

Allan Fisher, Past President, AFT Local 2121

Rodger Scott, Past President, AFT Local 2121

This is the report of the Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges (the "ACCJC"), in response to a complaint (the "Complaint") that was submitted to ACCJC and written by a law firm that represents the California Federation of Teachers (the "CFT") and a number of individuals, all of whom are identified on the foregoing title page and all of whom appear to be associated with the CFT. Under the Policy of the ACCJC that concerns complaints against the ACCJC (Accreditation Reference Handbook, Commission Policies, *Complaints Against the Accrediting Commission for Community and Junior Colleges*), a complaint against the ACCJC is ordinarily considered by the ACCJC's President. However, in this instance, it was noted that the Complaint makes allegations about the President. Because of these allegations (and not because they were found to have any merit), the Chair of the Commission appointed the members of the Executive Committee (the "Committee") to consider the issues contained in the Complaint and prepare this report.

In reviewing the Complaint, several introductory remarks are in order. First, the Complaint includes many pages that are devoted to allegations that various policies and procedures of the ACCJC violate laws, including California court created laws, state statutes, USDE regulations, and so on. The Committee will not address any of those allegations in this report. This is not a court of law. The ACCJC's policies and procedures are developed in consultation with and periodically reviewed by the ACCJC's legal counsel. The ACCJC has no reason to believe that its policies are not fully in accordance with all applicable legal requirements.

Second, the Complaint is characterized by the author as both a Complaint and "Third Party Comment." The Committee does not agree that the Complaint is properly characterized as Third Party Comment. The purpose of the ACCJC's practice of accepting Third Party Comment is to maintain a process whereby persons who have concerns about an educational institution may express those concerns without going through the formalities of filing a complaint about the institution. The Third Party Comment process is a more informal mechanism that is designed to encourage anyone with concerns about an institution to address those concerns to the Commission. The Commission will act on Third Party Comment when it finds that the Comment raises legitimate concerns about an institution's compliance with Accreditation Standards. The Third Party Comment process was not designed to permit persons to voice criticisms of the Commission, the Commission's staff, the Commission's processes, or its procedures. For the reasons explained, the Committee does not consider the Complaint the appropriate subject matter of Third Party Comment and will not deal with it as such.

The ACCJC's policy allows members of the public to submit a complaint. As mentioned above, the Commission's policies include a formal policy that outlines the manner in which such complaints will be processed. This policy (*Complaints Against the Accrediting Commission for Community and Junior Colleges*), together with all other ACCJC Policies, is found in the Accreditation Reference Handbook, Commission Policies. The Committee finds that the Complaint in this instance appropriately constitutes a Complaint against the ACCJC relating to the Commission's "show cause" sanction against the City College of San Francisco (the "CCSF").

Third, it is worth noting that the Complaint was not filed by the CCSF. It raises issues and arguments that one might expect an institution, not a third party, to raise, assuming the institution

believed that they had merit. There is no reason to believe from a review of the Complaint that the institution agrees with or believes that any of the allegations have merit. It has been prepared by the CFT, a union that is the collective bargaining agent for the faculty in negotiations of matters such as the salaries and working conditions of its teachers. It is fair to conclude that these allegations are not reflective of the views, official or otherwise, of CCSF.

Finally, we have attempted to generally follow the organization of the Complaint in preparing this report. The Complaint consists of 280 pages, plus a voluminous number of exhibits. This Report attempts to distill those allegations which the Committee believes raised issues that merited our attention and reflection. Many issues raised in the Complaint are not responded to directly in this report. The lack of response to a particular allegation does not imply that the allegation has merit in the view of the Committee. To the contrary, it reflects the fact that the Committee concluded that such allegations did not merit a reply in this report.

THE COMMITTEE FINDS AS FOLLOWS:

1. Allegation: The Complaint alleges that the Commission's show cause decision was based on a mischaracterization of the accreditation history of CCSF, arguing that the Commission, in 2012, based its decision to issue the "show cause" order on issues that had been merely cited as "recommendations" in the Evaluation Report (the "2006 Report") by the team that visited the institution in March of 2006. The Complaint appears to allege that this resulted in the institution never being properly forewarned of the seriousness of the concerns before the "show cause" order was imposed.

Findings: The Committee finds that this allegation is without merit. CCSF has ample prior knowledge of the Commission's concerns about its compliance with Accreditation Standards and Eligibility Requirements.

It is accurate that the 2006 Report found that the institution met sufficient numbers of standards to have its accreditation reaffirmed. However, the 2006 Report also included eight "major recommendations." When the Commission met and considered the 2006 Report at its Commission meeting on June 7-9, 2006, it considered two of the "recommendations" to be serious enough to require that the institution take corrective action and provide the Commission with a Progress Report. When the Commission considered and accepted the institution's Progress Report in 2007, it required that the institution prepare and submit a Focused Midterm Report, addressing progress in all eight recommendations in the 2006 Report. The Commission's action letter stated that the midterm report "must give evidence that the recommendations identified by the Commission should be fully addressed." When the Commission again met to consider the institution's Focused Midterm Report in 2009, it required that the institution address two of the recommendations in a still further Follow-Up Report. When the Commission accepted the institution's additional Follow-Up Report in 2010, it noted a remaining Commission concern with the institution's compliance with Standard III.D, Financial Resources, and required that the institution address the Commission's concern in the comprehensive Self Study Report due in spring 2012. In other words, from the date of the Commission's June 29, 2006 action letter to the institution, CCSF was on notice that there were multiple areas of concern which, if not

appropriately addressed, could result in a finding that the institution was failing to comply with Accreditation Standards or Eligibility Criteria at the time of its next review.

When the Commission finds that an institution's continuing ability to meet a particular Accreditation Standard is potentially threatened, it alerts the institution to these areas of possible future deficiency and generally requires that the institution address them in one or more follow-up reports. This was done repeatedly between 2006 and 2012, when the show cause sanction was imposed. As the Commission's *Policy on Commission Actions on Institutions* explains, the Commission may find that an institution meets the standards but nevertheless requires a follow up report when,

"The institution substantially meets or exceeds the Eligibility Requirements, Accreditation Standards and Commission policies, but has recommendations on a small number of issues of some urgency which, if not addressed immediately, may threaten the ability of the institution to continue to meet the Eligibility Requirements, Accreditation Standards and Policies." (III, page 39)

The Evaluation Report (the "2012 Report") of the team that visited the institution in March of 2012 documented that, between 2006 and 2012, the situation at CCSF had deteriorated dramatically, and many of the areas which were noted only as 'recommendations' in the 2006 Report had deteriorated to the extent that they had become serious deficiencies in 2012. The 2012 evaluation report also documented that the improvements that the institution professed it had made in its various follow-up reports to the Commission did not appear, in fact, to have been implemented.

When the Commission voted to place the institution on sanction in 2012, it did so, properly, based on the condition of the institution in 2012. Both the 2012 Report and the July 2012 Commission Action Letter which imposed the show cause sanction were clear in pointing out the institution's substantial non-compliance with Accreditation Standards and Eligibility Criteria. The Action Letter noted that CCSF was out of compliance with Eligibility Requirements 5, 17, 18, and 21. It also gave the institution 14 significant recommendations, noted where these 2012 recommendations were repeating recommendations given to the institution in 2006, and identified a very large number of component parts of all four Accreditation Standards with which the institution was out of compliance.

Finally, it is worth noting that Commission *Policy on Commission Actions on Institutions* (Accreditation Reference Handbook, Commission Policies) does not require that the Commission place an institution on a lessor sanction before placing an institution on show cause (IV.C). Rather, the Policy describes each Commission action in terms of an institution's compliance at the time of the imposition of the sanction. When an institution's failure to meet standards falls to the point where the institution is in "substantial non-compliance," as was the case with CCSF in 2012; it is appropriate and in fact mandatory for the Commission to place the institution on show cause.

2. Allegation: The Complaint alleges that there were serious conflicts of interest which prejudiced the Commission's decision. Most of those allegations are centered on the fact that

ACCJC's President, Barbara Beno, is married to Peter Crabtree, one of the members of the team that visited CCSF in March of 2012.

Findings: The Committee finds no violation of the ACCJC's conflict of interest policies.

The ACCJC has a comprehensive policy designed to prevent the participation on evaluation teams or in the Commission's decision making process by anyone who has a conflict of interest (Accreditation Reference Handbook, Commission Policies, *Policy on Conflict of Interest for Commissioners, Evaluation Team Members, Consultants, Administrative Staff, and other Agency Representatives*). With respect to evaluation team members, such as the team on which Mr. Crabtree served, the Policy is extremely broad in reach and is directed to uncover virtually any interaction between the evaluation team members and the institution under review. For example, the following are specifically enumerated as the types of relationships which would create a conflict of interest: any current or prior employment at the institution/district/system being evaluated; candidacy for employment at the institution/district/system being evaluated; any current or prior services as a paid consultant or other business relationship with the institution being evaluated; any personal or financial interest in the ownership with a member of the institution/district/system; and any close personal or familial relationship with a member of the institution/district or system.

Mr. Crabtree was selected to serve on the team due to his experience in serving on past evaluation teams and because of his particular expertise in one of the subject areas that had to be covered by the evaluation team: technical and career education. He was not selected to serve on the evaluation team by Barbara Beno, and the Committee is satisfied that Barbara Beno had nothing to do with his appointment. He was selected by the ACCJC Vice President of Team Operations, Mr. Jack Pond, and assigned to the CCSF evaluation team. Mr. Crabtree was one of 17 persons to serve on that evaluation team. He was not the chair of the team and was asked to serve because of his expertise and effective prior service on other evaluation teams.

The mere existence of a spousal or other similar personal relationship between a member of the ACCJC's staff and a team member has never been viewed as creating a conflict of interest. It is not uncommon for staff members to have spouses or significant others who have professional lives centered in academic settings, and the existence of such relationships has never been viewed as biasing the judgment of the team member or the prejudicing the institution. Thus, the existence of such a relationship would normally not be formally disclosed to the institution.

That being said, it is recognized that spousal or other close personal relationships could conceivably be significant in this regard depending on the facts. For example, if a prospective team member were married to a member of the faculty of CCSF, that team member would not be selected because of that spousal relationship. Similarly, if an ACCJC staff member had only recently terminated an employment relationship with the institution under review, then that relationship would probably also disqualify that person's spouse from serving on an evaluation team. However, in this instance, neither Barbara Beno nor Peter Crabtree had any prior relationship with CCSF that would indicate that either would have a conflict of interest with CCSF.

It is also important to point out that Barbara Beno, whom the Complaint contends had a bias against CCSF, was neither a member of the CCSF evaluation team nor did she accompany the team when it visited the institution. After the visit, under established practice, the team chair prepared the 2012 Report in consultation with all members of the team. All members of the 2012 team reviewed and were given the opportunity to comment on the report before it was finalized. To suggest that the views of any one member of an evaluation team, particularly one who was not the chair and whose area of expertise was focused, could have so influenced and prejudiced the views of the other 16 members and somehow led all of those other members to prepare an unfair and biased report against the CCSF lacks credibility. For all of the above reasons, the Committee finds that the assertion that the spousal relationship between Barbara Beno and Peter Crabtree created a conflict of interest which prejudiced the institution is without merit.

After completing a series of lengthy arguments that restated the author of the Complaint's position against Mr. Crabtree, the Complaint continues for many more pages, citing various statements made by Barbara Beno and by two Commissioners, Steve Kinsella and Frank Gornick. The author of the Complaint sites these statements, which were largely, if not entirely, made in contexts that did not relate to the CCSF, in an attempt to portray these individuals as biased towards the CCSF. We have reviewed the statements and find all of these allegations to be unconvincing and uniformly without merit. We further find that the ACCJC staff, the evaluation team in 2012, and the Commission at all times followed the ACCJC's Policies, including its policy on conflict of interests, in the review of CCSF and in the decision that resulted in CCSF being placed on sanction.

3. Allegation: The Complaint alleges that no confidential recommendation was provided by the Evaluation Team to the Commission when it imposed the sanction.

Findings: This is not accurate. A confidential recommendation, signed by all members of the team as is customary was prepared and provided to the Commission at its June 6-8, 2012 meeting when the show cause sanction was imposed.

4. Allegation: The Complaint makes a series of allegations which attack the Commission's application of Standard III.D when it imposed its show cause sanction on CCSF. Standard III.D includes a requirement that an institution show that its financial resources planning has taken into account its long and short term liabilities.

Finding: The Committee finds that the allegations regarding this issue are without merit. An evaluation team is expected to draw upon external resources such as the institution's most recently completed audit, to aid it in its analysis of an institution's compliance with the ACCJC Standards. The ACCJC may also draw upon external resources, such as the Governmental Accounting Standards Board's standards, to assist in the development of the ACCJC Standards, but the Commission bases its accreditation decisions on an application of its Standards to the institution, not on an application of the standards of any external agency or body to its institutions. The 2012 Report and the Commission's 2012 action letter appropriately found serious deficiencies in CCSF's compliance with Standards III.D and III.D.1.c. The ACCJC Standard III requires that an institution effectively use "... its human, physical, technology, and financial resources to achieve its broad educational purposes ..." Subsection D concerns an

institution's financial resources, and, in short, requires that an institution adequately consider its short and long term liabilities when it engages in financial resources planning. For public institutions, such as CCSF, long term liabilities include adequately planning and budgeting for health care costs for retired employees of the facility. This had not been done. As the 2012 action letter observed,

"The lack of self-examination and failure to react to ongoing reduced funding has caused the institution to reach a financial breaking point. The college's unrestricted net assets are in a deficit position for the third consecutive year and the deficit continues to grow. Without sufficient cash flow and reserves to maintain financial stability and realistic plans for the future, CCSF will be challenged to maintain financial solvency." (Evaluation Report, page 55) The institution's "short range financial plans do not incorporate plans for payment of future liabilities. The long-range liabilities that have not been considered include post-employment medical benefits (OPEB) and a substantial underfunding of the district's workers compensation self-insurance fund. These liabilities clearly are a threat to the financial stability of the College. The primary reason these issues cannot be resolved is because the unrestricted general fund salaries and benefits exceed 92% of the total expenditures excluding transfers. The remaining 8% is simply not adequate for all other operations and maintenance." (Evaluation Report, page 56)

The gist of these allegations in the Complaint appears to be that the ACCJC should not sanction CCSF even though it had not adequately planned for its long term liabilities. The ACCJC expects its accredited institutions to calculate and plan to fund long term liabilities, including anticipated expenses associated with long term retiree benefits, in order to prevent the institution from becoming insolvent in any future year when its expenses for such benefits exceed its capacity to cover them. Such insolvency can result in unplanned and unmanaged reductions in funds for educational programming, harming students and their ability to complete classes, programs and degrees. The Committee finds that the ACCJC's Standards on this subject are clearly stated and that the Commission's findings contained in the 2012 action letter were fully consistent with the evidence presented to the Commission.

CONCLUSION:

For the reasons stated above, the Committee finds that the allegations in the Complaint are without merit.

ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES
Western Association of Schools and Colleges

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

*(Adopted June 1998; Revised January 1999, January 2001, January 2002, June 2002;
Edited January 2004, October 2007; Amended January 2011, January 2013, May 2013)*

**ARTICLE I
PURPOSE**

Section 1. Name

The name of this nonprofit corporation shall be the Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges. This corporation shall be referred to throughout these bylaws as ACCJC.

Section 2. Purpose

ACCJC is a nonprofit, public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporations Law of the State of California for public and charitable purposes. Those public purposes include improving and validating the quality of post secondary education at public and private educational institutions, with a focus on community colleges, career and technical colleges, and junior colleges, through the creation and application of standards of accreditation and related policies, and through a process of review by higher education professionals and public members. ACCJC's evaluation of institutions assures the educational community, the general public, and other organizations and agencies that an institution has clearly defined objectives appropriate to higher education; has established conditions under which their achievement can reasonably be expected; appears in fact to be accomplishing them substantially; is so organized, staffed, and supported that it can be expected to continue to do so; and demonstrates that it meets ACCJC's Eligibility Requirements and Accreditation Standards. ACCJC encourages and supports institutional development and improvement through an institutional self-evaluation using the Accreditation Standards, Eligibility Requirements and Policies, as well as Midterm, Follow-Up, and Special Reports, and periodic evaluation of institutional quality by qualified peer professionals.

Section 3. Principal Office

The principal office of ACCJC is located at 10 Commercial Blvd, Suite 204, Novato, CA, 94949, or at such other location as the Commission shall decide. The Commission may establish branch or subordinate offices.

Section 5. Action without a Meeting

Any action required or permitted to be taken by the Board may be taken without a meeting if all directors individually or collectively consent in writing to that action. Such action by written consent shall have the same force and effect as a unanimous vote of the Board. Such written consent or consents shall be filed with the minutes of the proceedings of the Board.

Section 6. Minutes

The Board shall maintain minutes of all of its meetings and proceedings. The meetings of the Board may take place concurrently with meetings of the Commission or separately, at the discretion of the Board, but the minutes of Board meetings shall be maintained separately.

Section 7. Agenda

The Board's Chair, in consultation with the President shall decide the Board's agenda. The Board's business shall include all matters which require Board action or review. When the Board meets to consider actions that concern the candidacy or accreditation of member institutions, the imposition of sanctions, or the review and approval of eligibility criteria, accreditation standards or institutional policies ("Accreditation Matters"), the Board shall do so as the Commission and shall act under Articles III and V of these Bylaws. Authority and responsibility over all Accreditation Matters resides exclusively with the Board when it is acting as the Commission. Examples of Board agenda items, when the Board is not acting as the Commission, include the review and acceptance of ACCJC's annual audit, review and approval of any internal operational policies, review of ACCJC's investments and reserves, receipt of reports from the Executive and other committees concerning matters that do not involve Accreditation Matters, review of ACCJC's relationship with vendors, including its banking relations, review and approval of any leases for space or other significant contracts, approval of any loans or lines of credit, personnel issues that require board review, periodic evaluation of its President and other officers, review of ACCJC's insurance policies, and such other matters, involving the policy or direction of ACCJC that are referred to it. Board meetings that do not involve Accreditation Matters will ordinarily be conducted in Executive Session.

ARTICLE VII OFFICERS

Section 1. Officers

ACCJC shall maintain the following officers: a Chair, a Vice Chair, the President, a Secretary and a Chief Financial Officer. The positions of Chair, Vice Chair, and President shall be held by different persons. The Secretary and Chief Financial Officer positions may be held by the same person or by persons who hold other officer positions.

Section 2. Selection of Officers

The position of Chair is filled by the succession of the Vice Chair. The Vice Chair is elected by the Board and succeeds to the office of Chair when that office becomes vacant. He or she then serves a two-year term as Chair. No member of the Board may serve as its Chair for longer than three consecutive years. Thus, the Vice Chair may succeed to no more than twelve months of an unexpired term, followed by his or her two-year term. When a vacancy

occurs in the Vice Chair position, an election to fill that office must occur within 45 days of the position becoming vacant.

Nominations for Vice Chair are normally solicited from the Directors before the winter meeting prior to the end of the Chair's term. Nominees for the position shall represent a different membership category from that of the incoming Chair. Four weeks prior to the scheduled vote, each nominee must submit a 200-word statement explaining why he or she is seeking the office. The statement is distributed to the full Board prior to the vote. Voting is conducted through a secret ballot submitted to the ACCJC executive staff. The results are to be announced to the entire Board within one week.

Officers are expected to serve in several ex-officio capacities. The Chair serves as an ex-officio, voting member of the Budget and Personnel Committee and of the Policy Committee, and as Chair of the Executive Committee. The Commission chair also serves on the WASC Board. The Vice Chair serves as an ex-officio voting member of the Executive Committee, and the Committee on Substantive Change, and may serve as the Substantive Change Committee's chair. The chair of the Budget and Personnel Committee serves as an ex-officio member of the Executive Committee.

The President, the Secretary, and the Chief Financial Officer shall be appointed by the Board and shall serve at the pleasure of the Board, subject to the rights, if any, under any contract of employment.

Section 3. Subordinate Officers

The Board may appoint, and may empower the President to appoint, such other officers as the business of the corporation may require, each of whom shall hold office for such period, have such authority, and perform such duties as are provided in these Bylaws or as the Board may from time to time determine.

Section 4. Removal and Resignation of Officers

Subject to the rights, if any, of an officer under any contract of employment, any officer may resign at any time by giving written notice to the President. Subject to the rights, if any, of an officer under any contract of employment, any officer may be removed, either with or without cause, by the Board, and, if appointed by the President, by the President.

Section 5. Vacancies in Office

A vacancy in any office because of death, resignation, removal, disqualification or any other cause shall be filled in the manner prescribed in these Bylaws for regular appointments to that office.

Section 6. President

The President shall be the Chief Executive Officer of ACCJC, and the general supervision, direction, and control of the operations of ACCJC, including its business and accreditation operations, shall reside with the President.

Section 7. Chair

The Chair of the Board shall preside at all meetings of the Board and of the Commission. The Chair of the Board shall also serve concurrently as Chair of the Commission. The Chair shall exercise and perform such other powers and duties as may be from time to time assigned to

him or her by the Board or by the Commission or as may be prescribed by these Bylaws. In the absence or disability of the President, the Chair shall also perform the duties of the President.

Section 8. Vice Chair

In the absence or disability of the Chair, the Vice Chair shall perform the duties of the Chair, and, when so acting shall have all the powers of the Chair. The Vice Chair shall have such other powers and perform such other duties as from time to time may be prescribed by the Chair or by these Bylaws.

Section 9. Secretary

The Secretary shall keep or cause to be kept, at the principal executive office or such other place as the President may direct, a book of the minutes of all meetings and actions of Board and the Commission with the time and place of holding, whether regular or special, and, if special, how authorized, the names of those present at such meetings, and actions taken.

The Secretary shall give, or cause to be given, notice of all meetings of the Board and the Commission and shall have such other powers and perform such other duties as may be prescribed by the Board, the President, or these Bylaws.

Section 10. Chief Financial Officer

The Chair of the Budget and Personnel Committee shall act as the Chief Financial Officer and shall be responsible for maintaining, or cause to be kept and maintained, adequate and correct books and records of accounts of the properties and business transactions of the ACCJC, including accounts of its assets, liabilities, receipts, disbursements, gains, and losses. The books of account shall at all reasonable times be open to inspection by the President and any member of the Board.

The Chief Financial Officer shall report to the President and the Board, at such times as they shall direct, an account of all of the financial condition of ACCJC, and the Chief Financial Officer shall have other powers and perform such other duties as may be prescribed by the President or the Board or by these Bylaws.

ARTICLE VIII COMMITTEES

The Executive Committee shall be comprised of the Chair, the Vice Chair, and the Chair of the Budget and Personnel Committee. For purposes of continuity of leadership, an individual who has completed a two-year period as Chair and who remains on the Commission to complete a term will also serve on the Executive Committee. The Executive Committee shall serve as council to the President between Board and Commission meetings and is authorized to act for the Board and the Commission between meetings on all matters that would appropriately come before the Board or the Commission and where action prior to the next Board or Commission meeting is necessary. All actions taken by the Executive Committee shall be reported to the Board or to the Commission, as appropriate, at its next meeting.

The Board and Commission shall be served by such standing and ad hoc committees as they create. Ad hoc committees, to serve the Board or Commission, may be created at the

discretion of the Chair, but their creation, functions, and authority must be ratified by a simple majority of the Board or Commission at the first Board or Commission meeting following the creation of the ad hoc committee.

Standing committees shall be authorized by a simple majority of the Board or Commission and may be dissolved by the same margin of the Board or Commission. The Commission may charge a standing committee with authority to act on its behalf, to the extent permitted by law. No Standing Committee membership may be comprised of a majority of the Board or Commission. Members and chairs of standing committees are appointed by the Chair and serve two-year terms. Current standing committees of the Commission are the Audit Committee, the Budget and Personnel Committee, the Committee on Substantive Change, the Policy Committee, and the Evaluation and Planning Committee. The Commissioner Nominating Committee is constituted at regular intervals as described in Article IV, above.

ARTICLE IX APPEALS

Section 1. Right to Appeal

If an institution, after availing itself of the Commission's Review process, described in the Commission's Policy "Review of Commission Actions," is the recipient of a Commission action that sustains a denial or termination of candidacy or accreditation, the institution shall have the right to appeal that decision. In order to perfect the appeal, the institution, acting through formal authorization to its chair from the institution's governing board, must deliver a notice of appeal to the President within the time frame and in the form described in the ACCJC Appeal Procedures Manual (described in Section 3 below). During the period up to and including the pendency of the appeal, the institution's status with the Commission shall remain the same as it was prior to the decision being appealed.

Section 2. Hearing Panel

Upon receipt of a properly completed and delivered notice of appeal, the Executive Committee shall appoint a Hearing Panel consisting of not less than five (5) nor more than seven (7) qualified persons. The Executive Committee shall also appoint the chair of the Hearing Panel. The Hearing Panel members may not be current Commission members and may not have participated, whether through Review Committee participation or through prior team participation, in the decision being appealed. At least one member of the Hearing Panel shall be a "representative of the public," meeting the definition under the federal regulations (as defined in 34 C.F.R. § 602.3). To the extent practicable, the Hearing Panel shall include a person with post-secondary administrative experience, a person with post-secondary faculty experience, and a person with post-secondary trustee experience.

Each member selected must sign the Commission's "Appellate Conflict of Interest Policy," acknowledging that they do not have conflict of interest. The institution shall have the ability to challenge the selection of any Hearing Panel member for cause according to the procedures in the ACCJC Appeal Procedures Manual. Each member, including the Chair, shall have one vote. Any replacement Hearing Panel members shall be selected in the same manner.

Commissioners

DR. SHERRILL L. AMADOR, CHAIR
Public Member

DR. STEVEN KINSELLA, VICE CHAIR
Gavilan College

DR. JOSEPH BIELANSKI
Berkeley City College

DR. TIMOTHY BROWN
Riverside City College

MR. CHRIS CONSTANTIN
Public Member

DR. GARY DAVIS
Accrediting Commission for Schools Member

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West Hills Community College District

DR. RICHARD MAHON
Riverside City College

MS. VIRGINIA MAY
Sacramento City College

MR. CHARLES MENG, II
Public Member

MS. SUSAN MURATA
Kapi'olani Community College

DR. RAUL RODRIGUEZ
Rancho Santiago Community College District

MR. MICHAEL T. ROTA
University Of Hawai'i

DR. BARRY RUSSELL
Chancellor's Office, California Community Colleges

DR. ELEANOR SIEBERT
Accrediting Commission for Senior Colleges
and Universities Member

DR. MARIE SMITH
Public Member

DR. PATRICK TELLEI
Pacific Postsecondary Education Council Member

DR. SHARON D. WHITEHURST-PAYNE
Public Member

MR. JOHN ZIMMERMAN
MTI College

Commission Staff

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ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES

PUBLIC SESSION AGENDA

January 9, 2013

Hyatt Regency Hotel, San Francisco Airport, Burlingame, California

Call to Order: 9:30 a.m., Wednesday, January 9, 2013, Chairperson Sherrill Amador

Members Present: Members Present: Joseph Bielanski; Timothy Brown; Chris Constantin; Gary Davis; Frank Gornick; Steven Kinsella; Richard Mahon; Virginia May; Charles Meng; Susan Murata; Raul Rodriguez; Michael T. Rota; Barry Russell; Eleanor Siebert; Marie B. Smith; Patrick Tellei; Sharon D. Whitehurst-Payne; John Zimmerman.

Staff: Barbara A. Beno, President; Susan B. Clifford, Vice President; Krista Johns, Vice President; Garman Jack Pond, Vice President; John Nixon, Associate Vice President; Norv Wellsfry, Associate Vice President; Cheri M. Sixbey, Business Officer/Executive Assistant to the President; Barbara Dunham, Assistant.

OPENING PROCEDURES

ATTACHMENTS

- | | | |
|--|----------|---|
| 1. Review and Approval of the Agenda | (Action) | X |
| 2. Chair's Welcome and Overview | | |
| a. Introduction of New Commissioner Richard Mahon | | |
| b. Introduction of Special Guest | | |
| 3. Review and Approval of June 2012 Public Session Minutes | (Action) | X |

STAFF REPORTS

- | | | |
|---|--|---|
| 4. President's Report – Barbara Beno | | X |
| 5. Vice President Susan Clifford's Report | | X |
| 6. Vice President Garman Jack Pond's Report | | X |
| 7. Vice President Krista Johns' Report | | X |
| 8. Financial Task Force Review Committee Report – Commissioner Steven Kinsella, Chair | | X |

WASC CONSTITUTION AND ACCJC BYLAWS REVISION

- | | | |
|---|----------|---|
| 9. Approval of Bylaws – President Barbara Beno and Commissioner Marie Smith | | |
| a. Amendment to Western Association of Schools and Colleges Constitution Bylaws | Action) | X |
| b. Amendment to ACCJC Bylaws | (Action) | X |
| c. Appellate Conflict of Interest Policy and Statement | (Action) | X |

POLICY

10. First Reading Policies – Commissioner Marie Smith and Vice President Krista Johns
 - a. Policy on Substantive Change (Action) X
 - b. Policy on Institutional Integrity and Ethics (Action) X
 - c. Policy on Award of Credit (Action) X
 - d. Policy on the Rights and Responsibilities of the Commission and Member Institutions (Action) X
 - e. Policy on Representation of Accredited Status (Action) X
 - f. Policy on Commission Actions on Institutions (Action) X
 - g. Policy on Review of Commission Actions (Action) X
 - h. Policy on Public Disclosure and Confidentiality in the Accreditation Process (Action) X
 - i. Policy on Commission Good Practice in Relations with Member Institutions (Action) X
 - j. Policy and Procedures for the Evaluation of Institutions in Multi-College/Multi-Unit Districts or Systems (Action) X
11. Second Reading Policies – Commissioner Marie Smith and Vice President Krista Johns
 - a. Policy on Review of Accreditation Standards (Action) X
 - b. Policy on Student and Public Complaints Against Institutions (Action) X
12. Approval of Operational Policies – Marie Smith and Vice President Krista Johns
 - a. Policy on Relations with Government Agencies (Action) X
 - b. Coordinating Guidelines for the WASC Accrediting Commissions (Action) X
13. Elimination of Policy – Marie Smith and Vice President Krista Johns
 - a. Policy on Credit for Prior Experiential Learning in Undergraduate Programs (Action) X

REVIEW OF ACCREDITATION STANDARDS AND PROCESSES

14. Report on “ACCJC Review of Accreditation Standards and Practices” - Commissioners Mike Rota and Frank Gornick, Co-Chairs; Associate Vice President John Nixon, Staff X

OPERATIONS

15. Audit for 2011-2012 – Commissioner Gary Davis (Action) X
16. Recommendation for Auditor – Commissioner Gary Davis, Chair, Audit Committee (Action) X
17. Financial Report, January 2013 – President Barbara Beno X
18. Budget and Personnel Committee Report – Commissioner Frank Gornick
 - Preliminary Budget for 2013-2014 (Action) X
 - 2014-2015 Fee Schedule (Action) Handout

AGENCY RELATIONS

- | | |
|--|---------|
| 19. WASC Board of Directors Report – Commissioner Mike Rota | X |
| 20. WASC – Schools Commission – Commissioner Gary Davis | X |
| 21. WASC/ACSCU – Commissioner Eleanor Siebert | X |
| 22. California Community Colleges – Commissioner Barry Russell | X |
| 23. Hawai'i Colleges – Commissioner Mike Rota | Handout |
| 24. Pacific Colleges – Commissioner Patrick Tellei | X |
| 25. Council of Regional Accrediting Commissions – President Barbara Beno | X |
| 26. Council for Higher Education Accreditation – President Barbara Beno | X |

OTHER COMMITTEE REPORTS

- | | |
|---|---|
| 27. Evaluation and Planning Committee Report – Commissioner Sharon Whitehurst-Payne | X |
| 28. General Education/Lumina Advisory Committee Report- Commissioners Michael Rota and Gary Davis | X |

OTHER

- | | |
|--|---|
| 29. a. Commissioner Terms of Office Expiring June 2013 | X |
| b. Commission Vacancies by Position at June 2013 | X |

CALENDAR

Substantive Change Committee Meeting, March 18, 2013, Sonoma, CA
ACCJC Commission Development Workshop, March 19-21, 2013, Sonoma, CA
ACCJC Commission Meeting, June 5-7, 2013, Hotel to be determined, San Francisco Airport
WASC Board Meeting, Date to be determined

ADJOURNMENT

Under the Policy of the ACCJC that concerns complaints against the ACCJC (Accreditation Reference Handbook, Commission Policies, *Complaints Against the Accrediting Commission for Community and Junior Colleges*), a complaint against the ACCJC is ordinarily considered by the ACCJC's President. However, in this instance, it was noted that the Complaint makes allegations about the President. Because of these allegations (and not because they were found to have any merit), the Chair of the Commission appointed the members of the Executive Committee (the "Committee") to consider the issues contained in the Complaint and prepare this report.

In reviewing the Complaint, several introductory remarks are in order. First, the Complaint includes many pages that are devoted to allegations that various policies and procedures of the ACCJC violate laws, including California court created laws, state statutes, USDE regulations, and so on. The Committee will not address any of those allegations in this report. This is not a court of law. The ACCJC's policies and procedures are developed in consultation with and periodically reviewed by the ACCJC's legal counsel. The ACCJC has no reason to believe that its policies are not fully in accordance with all applicable legal requirements.

Second, the Complaint is characterized by the author as both a Complaint and "Third Party Comment." The Committee does not agree that the Complaint is properly characterized as Third Party Comment. The purpose of the ACCJC's practice of accepting Third Party Comment is to maintain a process whereby persons who have concerns about an educational institution may express those concerns without going through the formalities of filing a complaint about the institution. The Third Party Comment process is a more informal mechanism that is designed to encourage anyone with concerns about an institution to address those concerns to the Commission. The Commission will act on Third Party Comment when it finds that the Comment raises legitimate concerns about an institution's compliance with Accreditation Standards. The Third Party Comment process was not designed to permit persons to voice criticisms of the Commission, the Commission's staff, the Commission's processes, or its procedures. For the reasons explained, the Committee does not consider the Complaint the appropriate subject matter of Third Party Comment and will not deal with it as such.

The ACCJC's policy allows members of the public to submit a complaint. As mentioned above, the Commission's policies include a formal policy that outlines the manner in which such complaints will be processed. This policy (*Complaints Against the Accrediting Commission for Community and Junior Colleges*), together with all other ACCJC Policies, is found in the Accreditation Reference Handbook, Commission Policies. The Committee finds that the Complaint in this instance appropriately constitutes a Complaint against the ACCJC relating to



**ACCREDITING
COMMISSION**
for **COMMUNITY and
JUNIOR COLLEGES**

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Associate Vice President
LILY OWYANG

MEMO TO: CEO's

OCT -8 2010

FROM: Barbara A. Beno, President

Barbara A. Beno

DATE: October 4, 2010

SUBJECT: Accreditation Team Files

The Accrediting Commission asks for your help.

This year, as we review the roster of accreditation team members, the effects of retirements and reorganization of colleges and Districts on the accuracy and breadth of our evaluator pool are dramatically apparent. In addition, faculty hiring in the recent past brings a cadre of individuals who may now have the institutional experience which would make them effective evaluators. For these reasons, we are asking you to review for currency the enclosed list of persons from your institution and to nominate persons whom you believe would be appropriate for this activity.

We look for people who have demonstrated that they possess broad perspective about an educational institution and can exercise sound judgment. The best evaluators are those who are effective at what they do, are well regarded by their peers, have made a contribution to their institution, and whose judgment is respected. Individuals with these attributes can be found in any unit and at any level of an institution.

Team members should be good, analytic thinkers who can write well, use a computer to create and access documents, meet deadlines and work as part of a team. Finally, the persons recommended to serve on teams should be individuals you believe will be able to fulfill their commitment once they accept a Commission invitation to serve on a specific team.

Institutions completing self studies typically have several individuals who emerge as potential evaluators, often as self study or standards committee members. Professional association leadership, academic senate, or other institutional service activities may also provide experience which is helpful.

On the enclosed list, we indicate the individuals from your institution who are in the evaluator database which we use in making up accrediting teams. We are especially interested in adding chief executive officers, chief business officers, distance learning experts, faculty, and individuals who may be involved in program review and institutional planning, and the development and assessment of student learning outcomes. We suggest you contact the Faculty Senate leadership on your campus to help identify faculty that meet the Commission's expectations. We would appreciate it if you would do the following:

- 1) Please note on the enclosed list any current evaluators who may have retired, are no longer with your institution (if they have moved to another institution, please give us the college name and their new position if known), or who have changed assignments at your institution.

Chief Executive Officers

Page Two

October 4, 2010

- 2) Comment on any special considerations or qualifications of existing evaluators at your college.
- 3) Recommend additional college staff who would be unusually good evaluators and include special considerations or qualifications.
- 4) Indicate for each person you recommend any special field of expertise that he/she might have. It is very helpful to know that a person is knowledgeable about areas such as basic skills, computer applications, budgeting and accounting, institutional research, personnel administration, ESL, assessment, nontraditional delivery systems, planning, staff development, distance education, and other academic and administrative specialties.
- 5) Return the list with your notes to the Commission office.

I would also appreciate your indicating ethnic minorities: B - Black/African American; H - Hispanic American; A - Asian American; N - Native American (American Indian); P - Pacific Islander.

Your recommendations will be held in strictest confidence. We will notify people of their nomination and request biographical information directly of them. We use about 250 evaluators each year, with each team comprised of appropriate blends of veterans and rookies, ethnic and gender representation, range of experience, and institutional perspective.

To achieve maximum benefit from voluntary, nongovernmental accreditation, it is essential that evaluation teams include persons of genuine professional stature and that teams include appropriate professional, ethnic, and gender diversity. Thank you for your assistance.

BAB/tl

Enclosures

Kapiolani Community College

October 4, 2010

Title: Dr.
First:
Middle:
Last:
Position: Director, Planning & Institutional Research
E-Mail:
Phone: 808-734-9569
Fax: 808-734-9162
Ethnicity: C

☐ Continue to recommend for service ☐ Do not recommend for service ☒ Retire from database

Title: Ms.
First:
Middle:
Last:
Position: Professor, French/Spanish
E-Mail:
Phone: 808-734-9728
Fax: 808-734-9151
Ethnicity: UNK

☐ Continue to recommend for service ☐ Do not recommend for service ☒ Retire from database

Title: Mrs.
First:
Middle:
Last:
Position: Professor, Mathematics
E-Mail:
Phone: 808-735-3157
Fax: 808-734-9151
Ethnicity: C

☐ Continue to recommend for service ☐ Do not recommend for service ☒ Retire from database

Title: Ms.
First:
Middle:
Last:
Position: Director, Office of Continuing Education
E-Mail:
Phone: 808-734-9567
Fax: 808-734-9162
Ethnicity: AS

☐ Continue to recommend for service ☐ Do not recommend for service ☐ Retire from database

Kapiolani Community College

October 4, 2010

Title: Dr.
First:
Middle:
Last:
Position: Counselor & Coordinator/Maida Kamber Center
E-Mail:
Phone: 808 734-9500
Fax: 808-734-9456
Ethnicity: B

☐ Continue to recommend for service ☐ Do not recommend for service ☐ Retire from database

Signed by President: _____

Date: _____

ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES
WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES
DATA FOR USE IN THE SELECTION OF ACCJC EVALUATION TEAMS
(Please type or print)

(Mr.) (Ms.) (Dr.) Name _____ Gender M F
Title _____ Institution _____
Address _____
Home Address (Optional) _____

Current Position:

Administration ____; Instructional Faculty ____; Student Support Services ____; Library/Learning Resources ____; Trustee ____

Describe your role _____

Business Telephone: _____ Business Fax: _____

Home Telephone: _____ Home Fax: _____

Business Email: _____ Home Email: _____

Professional Education:

Earned Degree	Year	Institution	City and State
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Professional Experience:

Administrative Experience (____ Yrs.) Describe: _____

Teaching Experience (____ Yrs.) Major Discipline/Field: _____ Related Discipline/Field: _____

Student Support Services Experience (____ Yrs.) Describe: _____

Library/Learning Resources Experience (____ Yrs.) Describe: _____

Trustee Experience (____ Yrs.) Describe: _____

Other Professional Experience (____ Yrs.) Describe: _____
(Grants, Research, etc.)

Special Qualifications/Experience, check all that apply and describe.

Fiscal Management _____; Facilities Management _____; Human Resources _____; Faculty Staff Development _____;
Student Learning Outcomes (Design and Assessment) _____; Program Review _____; Instructional Methodologies _____;
Educational Technology _____; Distance Education (Design and Assessment) _____; Institutional Planning/Evaluation _____;
Adult /Pre-Collegiate Education _____; Non-Credit _____

Describe _____

Other Qualifications/Experience

Accreditation Experience

Professional Awards/Affiliations

Ethnicity (optional) _____

Signature _____ Date _____

You may attach a resumé if available

Please return this form to:

Accrediting Commission for Community and Junior Colleges
10 Commercial Blvd., Suite 204, Novato, CA 94949
Tel: 415-506-0234 Fax: 415-506-0238