California Community College Independents (CCCI)
12345 El Monte Road, Los Altos Hills, CA 94002
Phone: 650/949-7544 • Fax: 650/941-7322
www.cccindependents.org
Richard Hansen, President • hansenrichard@fhda.edu

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TO: United States Department of Education Accreditation Committee

FROM: California Community College Independents

SUBJECT: Written Comments regarding the Accrediting Commission for Community and Junior Colleges (ACCJC)

INTRODUCTION

The California Community College Independents (CCCI) is an association of independent faculty unions representing more than 12,000 community college faculty teaching more than a half a million students in California. CCCI represents faculty at Allan Hancock, Contra Costa, Chabot-Las Positas, Foothill-De Anza, Ohlone, Pasadena, Rancho Santiago, Redwoods, Santa Barbara, Santa Monica, Santa Rosa, West Valley-Mission and Yosemite community college districts.

As an association of college teachers, scholars, librarians and counselors, CCCI is deeply committed to high-quality public education and to the future of community colleges. But it has become painfully clear in recent years that our accrediting agency, the ACCJC, is undermining rather than guaranteeing the quality of our institutions. In May of 2009, responding to overwhelming outcry from our members, CCCI unanimously passed a resolution of "no confidence" in the ACCJC (see exhibit 1, attached) and began calling for accreditation reform in California. Our resolution was subsequently endorsed by the statewide Academic Senate, and similar calls for accreditation reform quickly followed from all the major organizations that represent community college faculty, including the Faculty Association of California Community Colleges, the California Federation of Teachers and the California Teachers Association. A taskforce was convened by then State Chancellor Jack Scott, with faculty groups represented, including CCCI, and in October of 2009 that taskforce delivered seven recommendations to the Commission aimed at reforming accreditation to make it less burdensome, less expensive, and less punitive and threatening (see exhibit 2, attached). These included lengthening the cycle of accreditation; developing a means for colleges to provide feedback to the ACCJC; strengthening standards-based training; reviewing the ACCJC visiting-team selection process to involve a wider cross-section of participants; scaling accreditation expectations to national benchmarks; employing

more cooperative (and in some cases non-public) means to stress improvement rather than just compliance; and avoiding recommendations that encroach on negotiable issues. Unfortunately, these recommendations were largely ignored or dismissed by the Commission.

In 2011, a detailed report issued by the independent Research and Planning Group for California Community Colleges (the RP Group) affirmed the need for significant reform and concluded that shifting the focus of accreditation back to where it belongs, to "quality improvement," would require "a reinvention of the [current] accreditation process." The RP group recommended "transparent, open and honest opportunities for feedback without fear of retribution" and more consistency in applying and reviewing standards. However, their suggestions, again, have seemed to have little effect on the Commission's practices.

The most recent events at City College of San Francisco, culminating in the ACCJC's announcement that City College would lose its accreditation in 2014, pending appeal, and the subsequent complaint filed by the California Federation of Teachers have certainly put the ACCJC, its standards and practices, in the spotlight. But California Community Colleges have been struggling with an overly and often inappropriately punitive, inconsistent, secretive, non-responsive accrediting agency for many years now. The number and severity of sanctions imposed in California under the ACCJC and particularly under the leadership of ACCJC President Barbara Beno have long been dramatically out of sync with the rest of the nation. As colleges struggle to meet ever-increasing demands of our rogue accrediting commission--hiring consultants and mobilizing staff and faculty in massive efforts under dire threats--it is our students who are suffering the most. We simply do not have the resources to squander in this way any longer.

We therefore urge the Department of Education's Accreditation Committee to give serious consideration to the following and to recognize that informal and local efforts to influence the ACCJC and effect accreditation reform in California have failed. There are few if any other avenues for faculty and students than to turn for help to the Department of Education. Faculty, administrators and staff at our colleges operate today in an atmosphere marked by fear and intimidation. Bad attitudes about accreditation, we are told, can be cause for sanction. Administrators, particularly, are quite critical of the ACCJC in private but refrain from making public statements for fear of drawing negative attention to their institutions. The ACCJC has a reputation throughout our system for being not only arbitrary but vindictive. This is not healthy, and it has gone on too long. We thus appeal to your committee in great frustration, having exhausted what remedies seemed at hand, and having nowhere else to turn.

VIOLATION #1:
BASIC ELIGIBILITY REQUIREMENTS
(602.13 Acceptance of the agency by others.)

According to the Basic Eligibility Requirements for an entity seeking recognition, an agency "must be able to demonstrate that its standards, policies, procedures, and accreditation decisions are widely accepted in the United States by educators and educational institutions." An agency that cannot demonstrate this general acceptance, according to the "General Guidance" published by the Department of Education "may not be eligible for continued recognition." More specifically, "General Guidance on 602.13 explains that "wide acceptance" refers to "acceptance/support of [the agency's] policies, procedures, accreditation standards and decisions by applicable group(s) … in each of the categories," which specifically and explicitly includes educators.

Community-college educators in California, however, have increasingly and overwhelmingly indicated that they do not support or accept the standards, policies, procedures and accreditation decisions of the ACCJC. In the past four years, every major group that represents faculty, including all those representative bodies that serve as faculty voices on Consultation Council at the State Chancellor's Office – the Faculty Association of California Community Colleges, the Academic Senate, the California Federation of Teachers, the California Teacher's Association and our own group, the California Community College Independents – have publically called for accreditation reform and rejected the policies of the ACCJC. Our first resolution of "no confidence" passed unanimously by CCCI in May of 2009 (see Exhibit 1, attached), and in April of 2013, CCCI members again voted unanimously to renew that resolution.

While it might be possible, as the Accreditation Guide suggests, for the ACCJC to compile selected "sample letters of support to the agency from educators in the agency's accredited programs or institutions," it would be ludicrous to suggest that the ACCJC's policies and decisions are widely accepted by college educators. In CCCI, consternation and discontent over the Agency's standards and practices have been the dominant theme and main issue at all our meetings for over a decade. For the 12,000 educators we represent, not only is the ACCJC not widely respected or supported by educators, the agency is actually doing more to harm the quality of education in California than to protect it.

To all of the criticism that has been levied against the ACCJC in recent years, the complaints filed by faculty groups and even the suggestions from the State Chancellor's Office and its "accreditation task force," the ACCJC has generally answered (when they have condescended to respond at all), by stating that they do not answer to faculty or to the Chancellor's Office or the educational community at large, but only to the CEOs who run their "member organizations." In other words, the agency and its current president, Barbara Beno, have been quite clear in asserting that they do not need general support from educators and don't really care

how they are perceived. *But it is clear that having lost the general respect and support of the educators whose institutions the ACCJC accredits, the Agency no longer meets basic eligibility requirements and should not be renewed.* We urge the Department of Education to review our attached resolution of "no confidence," endorsed or repeated in one form or another by every major faculty organization in California, and to acknowledge that in the face of such overwhelming opposition from college educators, one simply cannot conclude that the standards, policies, procedures and decisions of the ACCJC are widely accepted by educators. The truth is that as far as most educators understand the present situation, there is no longer any relationship under the ACCJC between the level of sanction or accreditation status and the quality of an institution or the education it provides to students. We badly need the Department of Education to step in and prevent this from continuing.

VIOLATION #2
(602.16 Accreditation and pre-accreditation standards)

According to the General Guidance on 602.16, "agencies are expected to demonstrate that their accreditation and pre-accreditation standards are rigorous measures of the quality of the educational institution or program in each required area." The ACCJC, however, often seems more concerned with a particular model of governance structure and financial practice than quality. Of the colleges that have faced "show cause" sanctions in recent years (the most severe sanction the ACCJC can impose, short of removing accreditation), several have been top schools. Diablo Valley College (a CCCI member) was placed on "show cause" despite an excellent track record of student success. When asked about the seeming disconnect between the quality of instruction and student services, an ACCJC representative explained to one of our faculty leaders that the sanction had nothing at all to do with the quality of the student experience or education the college provided. The Commission apparently was interested in "other issues." At CCSF as well, we know that the data shows the college to be in the top ten percent in terms of student success outcomes. The sanctions imposed by the ACCJC are simply not credible or appropriate.

Furthermore, the General Guidance on 602.16 suggests that standards should be "written with sufficient clarity and/or specificity to be understood by others." But faculty and administrators frequently complain that they don't understand the sanctions and don't know exactly what must be done to come into compliance once the Agency has issued a sanction. There is often substantial confusion over what comments in ACCJC reports constitute informal suggestions for improvement and which are directives requiring correction.

The "standards and criteria" are supposed to "appear to be appropriate for the type of institution or educational program and level being accredited," and there is supposed to be a "reasonable basis for concluding that the standard is an effective measure of quality." But the standards and criteria have been called into question repeatedly, not only by faculty groups like CCCI but by the task force representing administrators, faculty and the State Chancellor's Office, and the ACCJC has

essentially ignored all criticism or calls for change. Several of the standards, including the current paperwork requirements related to student learning outcomes, do not appear to effectively measure quality. A recent survey of faculty in one of our member districts showed that more faculty believe the SLO standard, as written and enforced by the ACCJC, is undermining the quality of education in our colleges rather than improving teaching. As individual faculty are increasingly required to produce and verify reports as a significant part of their primary assignment, less time is being devoted to innovations in teaching and work that we really need to be doing to close achievement gaps and improve outcomes. There is widespread agreement throughout California that the accrediting standards under the ACCJC are unclear and in some cases unreasonable and needlessly burdensome.

VIOLATION #3
(602.18 Ensuring consistency in decision-making)

The ACCJC is notoriously unpredictable and inconsistent. According to 602.18b, the agency is supposed to have "effective controls against the inconsistent applications of the agency's standards." But the ACCJC either lacks such controls or ignores them. As we stated in our resolution of "no confidence," too often the ACCJC appears to ignore the recommendations of its own accreditation teams and team members, electing to impose a sanction even when the team does not recommend it (or at a different level than recommended). Often the level of sanction has seemed more political than anything else, and this is wrong. There is no general confidence in the consistency, objectivity, and essential fairness of the ACCJC among educators in California.

CONCLUSION

California's community colleges are in dire need of accreditation reform, and the ACCJC, at least under its current leadership, has made it clear that they are not only unwilling to change but are mostly oblivious to the harm they are causing and hostile to criticism. The California Community College Independents strongly urges the Department of Education not to renew the ACCJC as an accreditor because of its practices as described above.

Exhibit 1:

CCCI California Community College Independents

Allan Hancock • Contra Costa • Chabot-Las Positas • Foothill-De Anza • Grossmont-Cuyamaca • Ohlone • Pasadena
Rancho Santiago • Redwoods • Santa Barbara • Santa Monica • Santa Rosa • West Valley-Mission • Yosemite

Resolution

Whereas the California Community College Independents (CCCI) supports the goals of accreditation as a means of ensuring quality education for community college students and carrying out the mission of community colleges; and

Whereas the Accrediting Commission for Community and Junior Colleges' (ACCJC) interpretation and implementation of accreditation standards are no longer serving our colleges, faculty and especially students; and

Whereas the ACCJC under current leadership has overstepped its authority and undermined its own mission by sanctioning college districts inappropriately and with disproportionate severity; and

Whereas the ACCJC has too often ignored or dismissed the recommendations of its own accrediting site-visit teams; and

Whereas accreditation under the ACCJC has become an instrument of punishment rather than improvement; and

Whereas sanctions have too often been imposed by the ACCJC over issues not directly related to student benefit or improved instruction; and

Whereas the ACCJC's actions are now distracting college districts from their mission to serve students; and

Whereas the fear of sanctions is driving community college districts to expend considerable resources from increasingly limited budgets to meet the new and unreasonable ACCJC interpretation of accreditation standards rather than to benefit students; and

Whereas the ACCJC has interfered inappropriately in matters reserved to collective bargaining; and

Whereas the ACCJC's decisions are made in secret with little transparency and no oversight or accountability; and

Whereas the ACCJC has not been responsive or sensitive to feedback and suggestions from faculty and administrators; and

Whereas the Western Association of Schools and Colleges (WASC) has continued to support the current leadership of the ACCJC and their arbitrary and unreasonable decisions,

Be it therefore resolved on this 9th day of May that the California Community College Independents, representing nearly 25% of California's community college faculty, do formally and unanimously vote "no confidence" in WASC, in the ACCJC, and in ACCJC President Barbara Beno.

Exhibit 2:

CALIFORNIA COMMUNITY COLLEGES
CHANCELLOR'S OFFICE

Summary of Actions - Accreditation Task Force

At several meetings of the Consultation Council, issues and concerns about the accreditation process in California community colleges were discussed. It was decided to form an accreditation task force to address this matter. The following members of the Consultation Council were appointed to this task force:

Richard Hansen, FACCC
Nicki Harrington, CEO
Renee Kilmer, CIO
Ron Norton Reel, CTA
Jan Patton, Academic Senate
Manuel Payan, Classified Staff
Jack Scott, Chancellor

Later Barbara Davis Lyman was added to the task force to represent the Board of Governors.

After some discussion, the task force devised a survey on accreditation and sent this to the President and Accreditation Liaison Officer at each community college. After receiving the results of the survey, the task force formulated seven recommendations to present to the Accrediting Commission of Community and Junior Colleges. These recommendations accompany this memo.

On October 26 five representatives from the task force (Barbara Davis-Lyman, Nicki Harrington, Renee Kilmer, Jane Patton, and Jack Scott) met with five representatives of the Commission. A discussion of three hours followed. The representatives of the Accrediting Commission indicated that they could take no action since only the entire Commission could act. Their next meeting is in January.

We are hopeful that this process is fruitful. All of us recognize the value of accreditation and simply want to work together to make it more effective.

In the spirit of collaboration, and with the belief that accreditation is necessary and important, we provide the following recommendations to the ACCJC to enhance the process, especially as it applies to the California Community Colleges. We pledge our ongoing support to this effort to ensure the success of accreditation, the ACCJC and the California Community College System.

Recommendations to ACCJC

1. Develop a means for colleges to provide periodic feedback to ACCJC on the accreditation processes and their experiences, including both commendations for what went well and identification of what needs improvement.

2. Strengthen standards-based training of both visiting-team members and ALOs. Consider instituting an annual multi-day statewide California Community College conference to provide training and information to all interested constituencies. This could be co-presented with the Academic Senate and the CC League at the November annual CCC conference. Colleges could also present their best practices.

3. Review the ACCJC visiting-team selection process and consider means to involve a wider cross-section of the individuals in our system who desire to participate. Team participation should be treated as a professional development opportunity.

4. Scale accreditation expectations of Western Region colleges to benchmarks formulated relative to evidence of best practices documented in all of the accrediting regions in the country.

5. Consider lengthening the cycle of accreditation to 8 -10 years.

6. Employ cooperative ways to have accreditation result in improvement rather than just compliance. Also, develop more non-public ways to communicate to campuses their need for improvement.

7. Avoid recommendations that encroach on negotiable issues.