

July 1, 2014

Dr. Cindy L. Miles
Chancellor
Grossmont-Cuyamaca Community College District
8800 Grossmont College Drive
El Cajon, CA 92020

Dr. Constance Carroll
Chancellor
San Diego Community College District
3375 Camino Del Rio S.
San Diego, CA 92108

Dear Chancellors Miles and Carroll:

We are writing regarding our continuing concern about the Accrediting Commission for Community and Junior Colleges' (ACCJC) dismal record in providing accreditation services to California's Community College Districts and its inappropriate handling of City College of San Francisco's (CCSF) accreditation review.

The California Federation of Teachers (CFT) applauds your efforts and those of dozens of your colleagues to stand with CCSF and forestall termination of its accreditation. Like you, we have been advocating for reasonableness on the part of the ACCJC. Considering the numerous unfair and unlawful actions of the ACCJC we've asked that they rescind their July 3, 2013 order revoking CCSF's accreditation, confirm that "good cause" exists for an extension of time, establish a new evaluation team and schedule, and conduct a complete, fair and accurate evaluation of the college. There is no doubt that recent guidance from the US Department of Education (DoE) makes clear that the ACCJC has latitude to undertake such an approach.

However, after two years of witnessing the Commission's intransigence, obfuscation and willful violation of law, we had serious doubts that the ACCJC would now suddenly correct course. We wrote Chancellor Harris recently outlining our concerns (attached).

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education

ADMINISTRATIVE OFFICE
2550 N. Hollywood Way
Suite 400
Burbank, CA 91505
818-843-8226
818-843-4662 fax
www.cft.org

American Federation of
Teachers, AFL-CIO

True to form, the ACCJC came out with a new proposed policy on June 11th called “Restoration Status,” (RS) which some unfortunately embraced not knowing the details or the policy’s shortcomings. For example: Restoration Status would remove all internal review and appeal rights, and any college electing this route would place itself at the absolute mercy of ACCJC. Concerned about this, the CFT and many others submitted public comments to the ACCJC in opposition to ratification of this policy (attached). The Commission then made some revisions, but unfortunately things got worse.

Now, ACCJC proposes that the Commission may “allocate a one-time, short-term ‘good cause’ extension, for the college to reach compliance prior to acting on the institution’s termination.” Up to now the policy and practice had been to afford colleges multi-year extensions for good cause, sometimes retroactively. Limiting “good cause” extensions without public review is wrong. This final version affords ACCJC enormous discretion not subject to appeals.

“Restoration Status” offers no improvement for colleges over existing policies. Consider this: because termination of accreditation is made immediately effective with the Commission’s denial of either a request for RS or the unsuccessful completion of Restoration Status, without internal review, there is no way a wronged college has time to enjoin a wrongful disaccreditation. RS makes ACCJC’s dictatorial decisions immediately effective.

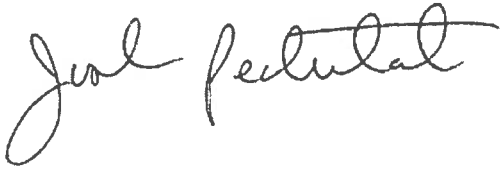
Again, this is unnecessary as ACCJC has always had the authority to extend colleges more time than two years to meet ACCJC requirements, provided there is good cause for more time. But they’re refusing to use it. Given the availability of other alternatives and ACCJC’s track record on refusing to follow its own policies or adhering to regulations and the rule of law, a community college district would be wise to avoid taking this course.

Finally, if there is any doubt as to the ACCJC’s limited capacity and unreliability when it comes to consistently and fairly administering its responsibilities, one need look no further than the findings contained in last week’s California Bureau of State Audits damning report on its handling of the CCSF review.

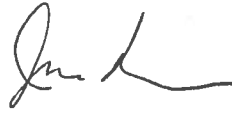
For all the reasons above and more, we are asking for your and your colleagues’ support in demanding that ACCJC immediately rescind its order to terminate CCSF’s accreditation and redo the college’s evaluation with a fair and balanced visiting team.

We trust your analysis will produce comparable results and lead you to similar conclusions.

Sincerely,



Joshua Pechthalt
President, California Federation of Teachers



Jim Mahler
President, AFT Guild

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cc: Dr. Brice Harris, Chancellor, California Community Colleges
Dr. Manuel Baca, President, California Community Colleges
Dr. Arthur Tyler, Chancellor, City College of San Francisco
Hon. Ed Lee, Mayor, San Francisco
Hon. Edmund G. Brown, US House of Representatives
Hon. Diane Feinstein, US Senate
Hon. Nancy Pelosi, US House of Representatives
Hon. Jackie Speier, US House of Representatives
Hon. Toni Atkins, Speaker, California State Assembly
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Hon. Paul Fong, California State Assembly
Hon. Darryl Steinberg, pro Tem, California State Senate
Hon. Kevin de Leon, pro Tem-elect, California State Senate
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Hon. Jim Beall, California State Senate
Hon. Jim Nielsen, California State Senate