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Santa Ana College • Santiago Canyon College

DATE: September 25, 2015  
TO: U.S. Department of Education  
FROM: Raúl Rodríguez, Ph.D., Chancellor  
RE: Accrediting Commission for Community and Junior Colleges

This letter is in support of the Accrediting Commission for Community and Junior Colleges (ACCJC). The ACCJC is currently under intense criticism from the California Federation of Teachers (CFT) as well as from a number of other individuals and organizations. The cause for this criticism is mainly political fallout from the actions taken by ACCJC against City College of San Francisco (CCSF). The fact that those actions were warranted because CCSF was out of compliance with the Accreditation Standards in over fifty specific areas doesn't matter to the union groups and the others who have now attached themselves to this cause. Even though the court action brought against the ACCJC by the City Attorney of San Francisco reaffirmed the right of the ACCJC to make the termination decision and even though the ACCJC modified its policies to create a new status called Restoration that has given more time to CCSF to attempt to come into compliance with the Accreditation Standards, the critics have not been mollified and the political fallout has been fierce and unabated.

From my perspective, the ACCJC is upholding the Standards that every institution under the aegis of the ACCJC approved. The practice of the ACCJC has always been to regularly review the Accreditation Standards. When that process occurs, every member institution is asked to provide comments and suggestions about the Standards. The ACCJC just completed a three-year review of its Standards. During that process, many forums were held to solicit input and other forms of outreach were pursued to gather comments and suggestions. All of the information received from the field was considered and, where appropriate, incorporated into the Standards.

One of the major allegations made against the ACCJC, primarily by faculty critics, is that the ACCJC is not transparent in its actions. If one compares ACCJC to the other regional accreditors, ACCJC is actually more transparent on many levels than are the other regional accreditors. Participatory governance regulations have been in effect in the California Community Colleges since 1988. These regulations require a high level of transparency in processes and decision making. If you compare the ACCJC to the practices that occur at most California Community Colleges, then the ACCJC would not measure up to that level of transparency. However, that is not an apt comparison as ACCJC is a public benefits corporation under California law and, as such, is not subject to the same regulations as a public community college in California. Further, the sensitive and confidential nature of much of the material under review in an

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accreditation process does not lend itself to public disclosure in the same manner as local college decision making processes.

The Chancellor of the California Community Colleges appointed a committee to review the ACCJC. This action was partially in response to political pressure from legislators from the San Francisco area who have been trying to pass legislation aimed at neutralizing or debilitating the ACCJC. The people appointed to this task force were not objective in my view. The report regurgitates erroneous information from previous reports (such as regarding the sanction rates and how they are counted) and the conclusions they arrived at were preordained. One of the things about this report that troubles me and other CEOs with whom I have spoken, is that this report was done in a secretive fashion. There was no input from the field as the task force was undertaking their task. There was no public vetting of their findings before the report was released. Previous reports on other topics from the Chancellor's Office always sought input from the field and vetted their findings before releasing a final draft. In addition, the report was completed a number of months before it was released to the public. It was held back to make the biggest political splash with its release, which just coincidentally happened to be close to the deadline for third party comment.

The situation with CCSF has created a witch hunt of the highest magnitude and lowest intentions. In the end, this whole fiasco comes down to a few critical points. The Accreditation Standards used by the ACCJC have always been approved by the member institutions, which is no different from the practice of other regional accreditors. It is the charge of ACCJC and the other regional accreditors to hold those member institutions accountable to meet those Standards (along with federal regulations and certain policies). If regional accreditors can only hold some institutions accountable, but not others (because "they are too big to fail" or "too important to fail" which are phrases often used in defense of CCSF), then regional accreditation, not just the ACCJC, is in real trouble. We all know that double standards exist, but they truly have no place and can't be allowed in an accreditation context. If the critics of the ACCJC succeed in causing ACCJC to lose its status as a regional accreditor, then there will be no way to hold institutions accountable for their actions, to ensure the quality of education to the public, and to undertake a peer review process that has any meaning or integrity.

There are many, many individuals across the territory assigned to ACCJC who support the work of the ACCJC. Given the chilling climate in California, many of those individuals are afraid to speak out for fear of incurring the wrath of their local union leadership. Nonetheless, I thought it was necessary to provide a counterpoint and context to the onslaught of criticism that will undoubtedly be directed toward ACCJC in the third party comment process.

Sincerely,

A handwritten signature in black ink, appearing to read "Raúl Rodríguez". The signature is fluid and cursive, with a large, stylized initial "R" and "D".

Raúl Rodríguez, Ph.D.  
Chancellor