



October 11, 2016

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Executive Director

U.S. Department of Education (USDE)
Office of Postsecondary Education
Attention: Herman Bounds, Director Accreditation Group
400 Maryland Avenue SW., Room 6W250
Washington, DC 20202

Subject: Accrediting Commission for Community and Junior Colleges

Dear Director Bounds:

I am writing on behalf of the Academic Senate for California Community Colleges (ASCCC) regarding our experience with the Accrediting Commission for Community and Junior Colleges (ACCJC). The ASCCC is designated through legislation to represent the 56,000 faculty in the California Community College system in all academic and professional matters, including accreditation processes. Our organization has an extensive history with the ACCJC, and we hope that the information we provide will be useful to you in your deliberations concerning ACCJC's request for recognition by the USDE.

ASCCC Resolution 2.02 in Fall 2015 endorsed the report of the California Community Colleges Chancellor's Office Task Force on Accreditation, which stated, "The structure of accreditation in this region no longer meets the current and anticipated needs of the California Community Colleges" and "The California Community College system and its member institutions have lost confidence in the ACCJC." Since the passing of this resolution, our organization has taken part in efforts to assist the ACCJC in revising its processes in order to address the many issues raised in the report. However, progress to this point has been minimal, and we remain concerned with numerous aspects of ACCJC's practices and policies.

We acknowledge that the ASCCC has achieved a working partnership with the ACCJC on several occasions in the past. ACCJC representatives have presented at numerous of our events, including ASCCC accreditation institutes, plenary sessions, and other venues, most recently in February of 2016. Our membership has greatly appreciated these interactions, as they have given faculty direct access to ACCJC commissioners and staff. This sharing of information and viewpoints in a collegial setting has been a positive aspect of the relationship between our organizations. The faculty of the California community colleges value and believe in peer evaluation processes, and we enthusiastically desire a collegial and productive relationship with our accrediting agency.

However, the ASCCC has also experienced numerous frustrations and concerns regarding the ACCJC, many of which have been reflected in the numerous resolutions regarding accreditation processes approved by the delegates to our bi-annual statewide plenary sessions. These resolutions represent the voice of faculty representatives from all 113 California community colleges. A sample of the concerns raised by resolutions during the past several years is as follows:

- Resolution 2.02 Spring 2015: Failure of ACCJC to provide evidence of deficiencies when sanctions are imposed on institutions.

- Resolution 2.01 Fall 2014: Unclear and intrusive language in ACCJC Standard III A.6 regarding the use of student learning outcomes data in employee evaluations.
- Resolution 2.02 Fall 2014: ACCJC's lack of transparency regarding commission decisions that conflict with evaluation visiting team reports.
- Resolution 2.03 Fall 2014: Insufficient faculty representation on ACCJC evaluation visiting teams.
- Resolution 2.03 Fall 2013: Changes to ACCJC processes and requirements without sufficient notice to member institutions.
- Resolution 2.10 Fall 2013: Lack of consistency in the expectations of evaluation visiting team members and need for improved team member training.

These resolutions represent only a few of the concerns that have been raised by faculty in the California community colleges regarding ACCJC processes and decisions.

In recent months, additional questions and disquiet with ACCJC processes and actions have arisen and have escalated previous concerns. One issue that developed during the 2015-16 academic year involves the number of colleges that have seen their accreditation reaffirmed for only eighteen months rather than a full accreditation cycle. The ASCCC understands that ACCJC's intent with this new practice may be to warn colleges and allow them to address deficiencies without being placed on formal sanction, which is a laudable objective. However, the June 2016 report of ACCJC actions lists ten institutions granted eighteen month reaccreditation, with two other institutions placed on warning. Similarly, ten institutions were assigned the eighteen month status in the January 2016 report. Thus, in the space of less than one year, nearly 18% of institutions in the California Community College System—20 out of 113—were assigned an abbreviated reaccreditation status, and none were found to be in full compliance with ACCJC standards. While the concept of providing a period for improvement rather than official sanction is in itself positive, in practice this new, abbreviated reaffirmation is being overused and appears to be on its way to becoming the new expectation in place of full re-accreditation.

Other recent concerns have involved ACCJC's standards for the California Community College System's newly created baccalaureate degrees. After the community colleges had worked diligently and collegially to establish standards for these new degrees that would ensure admirable academic quality, integrity, and rigor, the ACCJC imposed standards that not only exceed those developed by the community college system but were in fact more rigid and intrusive than similar standards from any other accrediting body in the United States. During the development of the standards, the ACCJC repeatedly denied requests by the Academic Senate and by other constituent voices in the California Community College System for meetings in which we might work together with our accreditor to address these issues, ignoring concerns that these new standards would unfairly and unnecessarily inhibit the development of the new programs and the hiring of faculty to teach in them. Finally, the ACCJC granted a phone meeting during which representatives simply stated, with no offer of evidence or confirmation, that these new standards that go

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beyond those of any other accreditor were dictated by the USDE. This situation remains exceedingly problematic for the colleges that are attempting to develop the new baccalaureate degrees and provides an example of the lack of collegiality and collaboration that we have too often experienced from ACCJC.

Representation of the faculty voice within the ACCJC is a long-standing concern that has recently arisen once again. The ACCJC Bylaws state, "At least five of the commission members shall be elected as academic representatives who are faculty." However, two current ACCJC commissioners who are designated as faculty representatives are now employed full-time as administrators, at least one of them on a permanent basis. ACCJC has made no acknowledgement of the change in status of these commissioners, thus reducing the faculty voice on the commission and continuing operations in violation of the organization's own bylaws.

These more recent developments, when considered in light of long-standing concerns regarding ACCJC processes and decisions, have led to a continuing sense of frustration on the part of the faculty of the California community colleges. We appreciate that the ACCJC has now engaged with our institutions in an attempt to improve its practices and create a stronger working relationship with the colleges in our system. However, promises of progress have yet to be realized in any meaningful way. The faculty in our system deeply desire a positive, collegial relationship with our accreditor, but to date the lack of observable change on the part of the ACCJC forces us to retain our concerns and our skepticism.

We hope that this information is useful to you in your deliberations concerning ACCJC's request for recognition. We thank you for your time and attention to this letter, and we would be happy to provide further comment or information at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Bruno", is centered below the text "Sincerely,". The signature is fluid and cursive.

Julie Bruno, President
Academic Senate for California Community Colleges on behalf of the Executive Committee