Dear Commission Members:

In our April 18, 2014, board meeting (Chief Executive Officers of the California Community Colleges), we spent considerable time discussing the precarious status of City College of San Francisco (CCSF) in light of four recent events: (1) the April 13th Op-Ed in the San Francisco Chronicle by Commission members suggesting that CCSF “seek accreditation anew by applying for “candidacy” status”; (2) the recognition that CCSF would lose its apportionment if it moved into candidacy status; (3) the receipt of invoices by ACCJC member institutions in the last week indicating a 5% special assessment for legal fees; and, (4) two pending pieces of legislation proposing to allow California’s community colleges to seek accreditation from alternative national accrediting bodies.

We concluded that we share grave concern for the educational future of the more than 70,000 students and community members affected by the status of CCSF, as well as for our existing system of regional peer-reviewed accreditation. In the past, as members, we have deferred to the relationship between individual colleges and the Commission for remediation of identified deficiencies and, in all but one case, California's public institutions have rebounded from sanction. However, the lesson from Compton Community College teaches us that we must raise our voice when a college's accreditation is in imminent jeopardy and an alternative path is available.

Therefore, on behalf of the Chief Executive Officers of California Community Colleges, I request that you use your discretion to extend the accreditation termination date for City College of San Francisco by two years, and continue the college on Show Cause during that time.

The Commission’s July 3, 2013, action letter identifying the July 31, 2014, termination date states, “The Commission may extend this date at its sole discretion if it determines conditions warrant such action.” This statement is supported by federal regulations, which provide the following authority for such an extension: “If the institution or program does not bring itself into compliance within the specified period, the agency must take immediate adverse action unless the agency, for good cause, extends the period for achieving compliance.” (34 CFR 602.20)

As representatives of a majority of ACCJC’s member institutions, we believe there is more than ample cause for ACCJC to extend the period for achieving compliance for the benefit of both the students and community served by CCSF, as well as for all ACCJC member institutions. We note two significant institutional reasons to grant CCSF additional time – progress and impact of closure.
We write this letter knowing we are not privileged to all the information available to ACCJC. While the college may still have much to do in response to the findings of the Commission, we are very aware of significant progress made at CCSF addressing academic, financial and governance concerns. For any college to tackle this array of concerns in a short period of time is significant; for a college as complex as CCSF, this progress is considerable. It took many years for CCSF to accrue the Standards deficits identified by ACCJC in 2012, but the college’s progression undergirded by new leadership, assures us that the deficiencies will be corrected in far less time. We believe this is sufficient reason for ACCJC to find “good cause” pursuant to the federal regulations.

Further, the impact of closure must be weighed. Simply put, there is no manner by which CCSF can redirect the more than 70,000 remaining students to other higher education options in the Bay Area. California’s community colleges continue to be deeply impacted by the recession that led to $1.2 billion in cuts over four years. It is unreasonable that any college or consortium of colleges could immediately absorb even a portion of CCSF’s students and that the majority of CCSF students would have the resources to enable their attendance at colleges outside of San Francisco. We believe this reason alone is sufficient for ACCJC to find “good cause” pursuant to the federal regulations.

There is an additional significant reason to grant CCSF additional time for the benefit of every other ACCJC member institution. On or around April 14, ACCJC member colleges received a dues invoice from ACCJC that included a 5% surcharge, which appears to have averaged around $1,000 per college. This surcharge is to pay the legal costs incurred by ACCJC to date relating to CCSF. From the information provided, it appears this is to pay for costs already accrued and not for the significant future costs if one or more legal cases go to trial.

As the “funders” of ACCJC’s legal defense bills, we believe it is critical to exhaust every non-courtroom remedy to minimize our financial exposure as well as any negative impact on students throughout the state. Allowing CCSF to complete its significant turnaround benefits the students and community served by the college, the ACCJC, and every institutional member of ACCJC. This is sufficient for ACCJC to find “good cause” pursuant to the federal regulations.

There are many reasons to recognize “good cause” and provide CCSF additional time to meet full compliance with ACCJC’s standards. We urge your attention to this avenue and the benefit it brings not only to City College of San Francisco, but also to every other member institution that has been involuntarily brought into this matter.

We look forward to a favorable response to this letter.

Helen Benjamin, Ph.D.
President, Chief Executive Officers of the California Community Colleges