July 8, 2015

ACCJC COMMISSION HEARING

Commission Chair Kinsella and Members of the Accrediting Commission,

Thank you for the opportunity to address the Commission today. I am Susan Lamb, Interim Chancellor of City College of San Francisco. Please allow me to introduce my colleagues here with me today, Board President Rafael Mandelman, Special Trustee Guy Lease, Academic Senate President Lillian Marrujo-Duck and General Counsel Steve Bruckman.

As you know, we are now completing the process initiated by the Superior Court following the trial brought by the San Francisco City Attorney’s office. Our Injunction Response document presents evidence regarding the ten standards in which the review team in 2013 found compliance, but the Commission found noncompliance. Further, our Response questions whether the Termination decision by the Commission was excessive considering City College’s compliance with the Standards at the time of the 2013 Team Visit and the progress made towards addressing the recommendations and deficiencies.

Until 2012, City College of San Francisco had not been sanctioned and had been continuously reaffirmed on every comprehensive evaluation. In fact, City College had been heralded as one of California’s and the nation’s premier community colleges. The 2006 visiting team recommended affirmation of accreditation without a follow-up visit. When comparing this outcome to the actions taken on other colleges in and around 2006, this was an exemplary outcome. Most other colleges either were placed on sanction, or were given a requirement for a follow-up visit for specific recommendations. The visiting team validated that “the college meets eligibility requirements and complies with the standards of accreditation, as required”. The ACCJC letter did not state that CCSF was out of compliance with any standard and did not make any reference to a requirement that compliance be achieved within a set period of time.

The Commission placed City College of San Francisco on Show Cause status on July 2, 2012. The college immediately began taking steps to bring the college into compliance. Merely eight months after the college was notified that it was to Show Cause why the college should not lose its accreditation, the Show Cause Review Team came to the college. The Team considered the 80 substandards that had been cited in 2012. Of these 80 substandards, the 2013 Review team found CCSF in full compliance with 54 of the substandards and partial compliance in several others. Thus, at the time the April 2013 Review Team visit was conducted, a significant
majority of the deficiencies had been addressed. In the vast majority of the findings of noncompliance, both the 2013 Review Team and ACCJC recognized that City College had taken the steps needed to bring the college into compliance. Despite this progress, the college was placed on Termination status because CCSF had not demonstrated compliance to the satisfaction of the Commission despite a recommendation from the Visiting Team to the contrary. One issue was that steps taken to be in compliance with some of the identified deficiencies had not been in place long enough for a quality improvement cycle to provide for the collection of data on the success of these new policies or practices, the analysis of these data, and the opportunity for further improvements in response to this evaluation process. However, the lack of time to establish compliance was entirely the result of ACCJC’s decision to have a follow-up visit only eight months later, and to allow less than one year to achieve compliance. This shortened timeline would be difficult for a college of any size to accomplish, but particularly difficult for one of the largest colleges in the United States with over 80,000 students. In this instance, if more time had been allowed, compliance with most standards would certainly have been achieved. It is very unusual to provide less than one year to address deficiencies. If City College had been allowed a little more time, for instance the usual two years to make the corrections, the college would have had time to demonstrate compliance and the opportunity to evaluate the effectiveness of these new policies or practices as part of our continuous quality improvement cycle.

Yes, I freely admit that CCSF, like many other colleges, was not in complete compliance when the Commission met in June 2013. However, the issue is, given the short timeline and all the evidence before the Commission regarding the college’s improvements, whether City College’s accreditation should have been terminated in 2013. In other cases in which ACCJC placed institutions on Show Cause, institutions were not held to a requirement that there must be full compliance with all standards in order to avoid termination. Several colleges on Show Cause status, following a visit by a review team the following year, have been placed on Warning when they have demonstrated substantial progress toward compliance. Thus, it is not ACCJC’s policy that a college on Show Cause must demonstrate full compliance or be terminated. It is permissible, and probably very appropriate, for an institution to move from Show Cause to a lesser sanction. Given, the progress made in the eight months and the overall level of compliance with the standards as evaluated by the Visiting Team, it is our belief that City College of San Francisco should also have been placed on a lesser sanction.

The consequences of ACCJC’s decision to place City College of San Francisco on Termination status, instead of a lesser sanction, has impacted both the college and the surrounding community. The college has seen a substantial enrollment decline because of the misconception that the college is already closing due to the termination decision. The decision has also impacted the college’s ability to attract and retain people in leadership positions who have the ability to help move the college in a more positive direction. In addition, the potential impact of closing a college of over 80,000 students and the prospective impact on the surrounding community, the workforce, and the ongoing economic health of the San Francisco community cannot be overstated.
Therefore, we are requesting that the Commission reconsider the 2013 Termination decision, and consider a more appropriate determination, considering the significant progress that the college had made in less than eight months, and the acknowledgement and evidence of that progress made in the Visiting Team Report.

I have served on numerous visiting teams, and have seen a variety of campuses which has expanded my understanding of the standards. By serving on these teams, and being part of a member organization, I always considered the ACCJC accreditation process to be a collegial process, far superior to similar government “regulation” processes in other countries. I believed that the colleges, the visiting teams and the Commission worked together to ensure that colleges met the standards for the benefit of our colleges and our students. Full compliance is often somewhat subjective, but the goal is always to improve in order to best meet the needs of our students, our local communities and the nation as a whole.

Therefore, it is with some concern that I read recent ACCJC letters to reaffirmed institutions that includes threats rather than congratulations. One such letter states, “the commission is required to take immediate action to terminate the accreditation of an institution which is out of compliance with any Standard. In the alternative, the Commission can provide the institution with additional notice and a deadline for coming into compliance that is no later than two years from when the institution was first informed of the noncompliance.” I am seeing good colleges, not just City College, who help students be successful through excellent programs and student services, being placed on sanction, and threatened with Termination based on minor institutional process flaws. We do not believe the so called Two Year Rule was intended to be used when colleges are given recommendations for improvement or cited for minor deficiencies by the visiting teams. What was once a peer evaluation process and a process toward meeting standards and achieving excellence, seems to have become a process of compliance and enforcement that overlooks the outstanding achievements in student success measures in favor of punishing a college for such violations as the Board of Trustees failing to review its mission statement in a given year.

While we at City College hold deeply to the belief that the decision to Terminate our accreditation was wrong, there is a universal commitment to address areas where we received recommendations for improvement and those which were found to be deficient. We are asking the Commission to correct this error and work with us as we implement these recommendations and remedy the deficiencies that have been identified.

City College has a long and proud history; people truly love the college. The initial reaction of some was to argue and reject the findings of the Commission. This was a natural human reaction; people were deeply hurt that the college they loved was being put through such an ordeal. Many people felt then and still feel that the action by ACCJC was unnecessarily harsh and that given the opportunity, compliance could have been achieved through less drastic measures.
Whatever decision you make, I can assure you that we will continue to work on full compliance with the Eligibility Requirements, the Standards, and the policies. The Board of Trustees, faculty, staff, students and administration are committed to work together to ensure we remain accredited, whatever it takes. The possibility of losing our accreditation has caused a catastrophic loss of students and a crippling loss of campus leadership that has created an extremely challenging environment for us all. Nevertheless, those of us who remain will rise to this challenge and we will find a way to continue the 80 year tradition of excellence for City College of San Francisco.

Thank you again for this opportunity to address our accreditation status and to speak to you today. If you have any questions, I welcome the occasion to provide you with more information.