



September 25, 2013

Kay W. Gilcher, Director
Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
1990 K Street N.W.
Washington, DC 20006

Dear Ms. Gilcher,

In your letter dated August 13th addressed to Dr. Barbara Beno, you gave the Accreditation Commission of Community and Junior Colleges (ACCJC) one year to correct four deficiencies before the United States Department of Education (USDE) would initiate an action to “limit, suspend or terminate” its recognition.

Comparably, when the ACCJC identifies deficiencies with a member institution that could lead to termination of its accreditation (e.g., Show Cause), the member institution is not only required to correct those deficiencies within a certain timeframe, but it’s also mandatory to prepare a *Closure Report* defining how the institution would terminate its operations and to identify appropriate alternatives for students to complete their academic study.

More specifically, the ACCJC has required Closure Reports from ten member institutions that have been placed on Show Cause, including: San Francisco City College, Diablo Valley College, College of the Sequoias, Cuesta College, College of the Redwoods, Compton College, Northern Marianas College, Palau Community College, College of Marshall Islands and the Salvation Army College for Officer Training at Crestmont.

Given the growing number of recent complaints that have been made against the ACCJC; an action by California’s Joint Legislative Audit Committee ordering a comprehensive audit of the agency; the multiple remonstrations (including lawsuits filed by the City of San Francisco, American Federation of Teachers and California Federation of Teachers); as well as its impending follow-up review by your office, we respectfully request that the USDE consider requiring the ACCJC to develop a similar Closure Report outlining how it would cease operations and, more importantly, identifying alternate accrediting organizations for its member institutions.

California’s community colleges operate under a six-year accreditation cycle and often prepare many reports – such as Mid-Term Reports and Substantive Change Requests – throughout that six-year period. Therefore, if ACCJC’s recognition as an accrediting organization is terminated, it’s imperative that member institutions have clear direction and viable options to ensure a seamless transition to another “recognized” accrediting body.

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As previously mentioned, the ACCJC is facing many daunting challenges from a variety of concerned stakeholders and is undergoing its own formal review to continue its recognition as an accrediting agency. Loss of its current status would greatly impact more than 2.5 million students currently attending California's community colleges as well as students at other member institutions. Accordingly, I strongly believe that there needs to be a clear and concise plan in place for how the ACCJC would terminate operations to protect the interests of the member institutions it presently serves. I greatly appreciate your attention to this matter.

Sincerely,



Ron Galatolo
Chancellor

Cc: Anna Eshoo, United States Congresswoman, 18th Congressional District of California
Buck McKeon, United States Congressman, 25th Congressional District of California
George Miller, United States Congressman, 11th Congressional District of California
Jackie Speier, United States Congresswoman, 14th Congressional District of California
Jerry Hill, California State Senator, District 13
Leland Yee, California State Senator, District 8
Rich Gordon, California State Assembly Member, District 24
Kevin Mullin, California State Assembly Member, District 22
San Francisco Board of Supervisors
Dennis Herrera, San Francisco City Attorney
Brice Harris, Chancellor, California Community Colleges Chancellor's Office
Scott Lay, President and Chief Executive Officer, Community College League of California
Elizabeth Daggett, United States Department of Education