

## ATTACHMENT 2

### Summary and Response to Comments Received During the Notice Period of November 7, 2014 through December 26, 2014, Inclusive

Official Notice of proposed changes to the California Code of Regulations, title 5, regarding minimum conditions - accreditation was published on November 7, 2014. The original proposed text was made available for public comment for at least 45 days from November 7, 2014 through December 26, 2014. The Notice specified the process to comment on the proposed changes. Three written comments were received during the comment period. A public hearing was held during the Board of Governors Meeting on November 17, 2014, at DeAnza Community College during which nine individuals commented on the proposed changes. Pursuant to *Standing Order* 206, subdivision (b)(3), the Chancellor's Office has summarized the comments regarding the proposed changes to the regulations below and has proposed a response for adoption by the Board. (Comments beyond the scope of the proposed changes have not been summarized.)

**Richard Hansen, California Community College Independent Faculty Union; Jonathan Lightman, FACC:** Support the proposed changes, however, request two changes; one, the term "regional" be removed so that the accreditor would not have to be from a specific region and two, that the regulation be amended to require that the Board of Governors to periodically review the designated accreditor, preferably every three years.

**Proposed response:** Agree with the proposed change to remove the adjective "regional" before accreditor and disagree with the suggested change to institute a regulatory required review period for the following reasons:

Regional accreditor: To eliminate confusion the term regional is proposed to be deleted. However, the change has no practical effect, and is therefore a technical amendment. In reality the term "regional" in this context has no meaning as accreditors are nationally recognized by the United States Department of Education to accredit educational institutions within a specific scope of recognition. That scope or recognition can be national or regional.

Regulatory required review: Implicit in the proposed regulations is the Board of Governors' authority at any time to seek a review of the accrediting agency and to designate a new accreditation agency as the Board deems appropriate. Specifying that a three year review is required in the regulation is not necessary as the Board already has this authority.

**Tim Killikelly, Alvin Ja, Martin Hittelman; Joshua Pechthalt and Fred Glass, California Federation of Teachers; Alisa Messer, English teacher at City College of San Francisco and with CCSF faculty union; David Morse, Academic Senate, John Rizzo, CCSF Board of Trustees; Karen Saginor, Librarian, Acting Department Chair:** Support the proposed amendments to the regulation.

**Proposed response:** Agree