Title: Bureau of State Audits Report on California Community College Accreditation—CCCCO 60-Day Response

Date: September 18, 2014

Contact: Erik Skinner, Deputy Chancellor

Background

On June 26, 2014, the Bureau of State Audits (BSA) issued an audit report entitled *California Community Colleges Accreditation: Colleges Are Treated Inconsistently and Opportunities Exist for Improvement in the Accreditation Process*. This audit report provided both a review of the Accrediting Commission for Community and Junior Colleges (ACCJC) and the accreditation process in general, as well as a more in-depth examination of recent events related to City College of San Francisco (CCSF). The report raised significant criticisms of the ACCJC and the accreditation process and made a number of recommendations to remedy the identified concerns. The Consultation Council discussed the report at its July meeting.

Many of BSA’s recommendations call on the Chancellor’s Office to engage ACCJC and attempt negotiate on behalf of the CCC system and the State of California for improvements in the accreditation process. Before meeting with ACCJC, the Chancellor’s Office is gathering input from community college stakeholders on these recommendations. Consultation Council is the primary venue for these internal discussions but other meetings and discussions will also help to inform our perspective and positions.

Proposal

The BSA calls for periodic reporting from agencies on progress in implementing its recommendations. These reports are required at 60 days, 6 months, and one-year following the release of the BSA report and then annually thereafter until the recommendations have been fully implemented. In order to keep stakeholders informed and involved, this Consultation Council item presents the 60-day responses provided by the Chancellor’s Office.
BSA Recommendations and CCCO Responses

BSA Recommendation 1:
To ensure that colleges receive consistent and fair treatment and are able to address deficiencies, the chancellor's office should work with the community colleges and request clearer guidance from the commission regarding what actions would allow for the full two-year period in which to remediate concerns and what actions would constitute good cause for extending the time an institution has to address deficiencies beyond two years. In doing so, the chancellor's office should also encourage the commission to specify in its policies those scenarios under which it would exercise the good cause exception so that institutions would have a better understanding of when they might reasonably expect additional time to address deficiencies.

CCCO Response: Given the central importance of the accreditation process to our colleges and the functioning of our system, the Chancellor's Office is gathering input from a broad range of California community college stakeholders. This is being accomplished through discussions at Consultation Council as well as in other meetings with stakeholders. The agenda item from the July 2014 Consultation Council meeting is attached as evidence of these efforts. Once sufficient information gathering has been accomplished, the Chancellor’s Office will reach out to the ACCJC and attempt to schedule meetings to discuss the issues raised in the audit report recommendations.

BSA Recommendation 2:
To ensure that community colleges and the public are fully informed regarding the accreditation process, the chancellor's office should assist community colleges in communicating their concerns to the commission regarding its transparency and in developing proposals for improving the commission's transparency policies and practices. The chancellor's office should also encourage the commission to publish policies describing the role of its staff in the commission's decision-making processes.

CCCO Response: Given the central importance of the accreditation process to our colleges and the functioning of our system, the Chancellor’s Office is gathering input from a broad range of California community college stakeholders. This is being accomplished through discussions at Consultation Council as well as in other meetings with stakeholders. The agenda item from the July 2014 Consultation Council meeting is attached as evidence of these efforts. Once sufficient information gathering has been accomplished, the Chancellor’s Office will reach out to the ACCJC and attempt to schedule meetings to discuss the issues raised in the audit report recommendations.
BSA Recommendation 3:
To make certain that institutions receive fair treatment in appealing decisions that terminate their accreditation, the chancellor's office should work with the community colleges to advocate that the commission change certain aspects of its appeal process. Specifically, in keeping with the spirit of accreditation, when institutions have taken steps to correct deficiencies that led to the decision to terminate accreditation, the institutions should be allowed to have information on those corrections heard as evidence in their appeal. Further, the commission president's involvement in selecting the appeal panel's counsel should be revisited.

CCCO Response: Given the central importance of the accreditation process to our colleges and the functioning of our system, the Chancellor’s Office is gathering input from a broad range of California community college stakeholders. This is being accomplished through discussions at Consultation Council as well as in other meetings with stakeholders. The agenda item from the July 2014 Consultation Council meeting is attached as evidence of these efforts. Once sufficient information gathering has been accomplished, the Chancellor’s Office will reach out to the ACCJC and attempt to schedule meetings to discuss the issues raised in the audit report recommendations.

BSA Recommendation 4:
To strengthen institutions' understanding of what they must do to comply with standards, and to provide them with the opportunity to address certain issues that could jeopardize their compliance, the chancellor's office, in collaboration with the community colleges, should encourage the commission to develop formal opportunities for institutions to communicate with and receive feedback from the commission on institutional self-studies and other reports before a formal evaluation takes place. In doing so, the chancellor's office should consider the practices of other regional accreditors and identify those that would best meet the needs of California's community colleges.

CCCO Response: Given the central importance of the accreditation process to our colleges and the functioning of our system, the Chancellor’s Office is gathering input from a broad range of California community college stakeholders. This is being accomplished through discussions at Consultation Council as well as in other meetings with stakeholders. The agenda item from the July 2014 Consultation Council meeting is attached as evidence of these efforts. Once sufficient information gathering has been accomplished, the Chancellor’s Office will reach out to the ACCJC and attempt to schedule meetings to discuss the issues raised in the audit report recommendations. We note that the Chancellor’s Office is currently launching an expansion of our capacity to provide technical assistance to colleges. This initiative, supported with resources provided in the 2014-15 State Budget, will provide a mechanism to inform and assist colleges in matters related to accreditation.
BSA Recommendation 5:
Community colleges, as members of the commission, should communicate their concerns about and ideas for improvement of training on the accreditation process to the commission. To provide assurance to colleges that they may suggest this information freely, the chancellor's office should coordinate communication between the commission and the colleges. Further, in order to build collegial relationships, engage new people in the accreditation process, and extend additional training to those already involved in accreditation, the chancellor's office should encourage the commission to develop an annual conference focused on accreditation and oversight.

CCCCO Response: Given the central importance of the accreditation process to our colleges and the functioning of our system, the Chancellor's Office is gathering input from a broad range of California community college stakeholders. This is being accomplished through discussions at Consultation Council as well as in other meetings with stakeholders. The agenda item from the July 2014 Consultation Council meeting is attached as evidence of these efforts. Once sufficient information gathering has been accomplished, the Chancellor’s Office will reach out to the ACCJC and attempt to schedule meetings to discuss the issues raised in the audit report recommendations. We note that ACCJC has already announced plans to host an annual conference, consistent with Recommendation #5.

BSA Recommendation 6:
To allow colleges flexibility in choosing an accreditor, the chancellor's office should remove language from its regulations naming the commission as the sole accreditor of California community colleges while maintaining the requirement that community colleges be accredited.

CCCCO Response: The Chancellor’s Office is in the process of conducting legal and policy analysis related to this recommendation. In addition, the Chancellor’s Office will also seek input from the colleges about this proposal. Based on this research and input, the Chancellor’s Office will determine an appropriate course of action.

BSA Recommendation 7:
To allow colleges flexibility in choosing an accreditor, the chancellor's office should identify other accreditors who are able to accredit California community colleges or who would be willing to change their scopes to do so.

CCCCO Response: The Chancellor’s Office is in the process of conducting legal and policy analysis related to this recommendation. In addition, the Chancellor’s Office will also seek input from the colleges about this proposal. Based on this research and input, the Chancellor’s Office will determine an appropriate course of action.
BSA Recommendation 8:
To allow colleges flexibility in choosing an accreditor, the chancellor's office should assess the potential costs, risks, and feasibility of creating a new independent accreditor.

CCCO Response: The Chancellor’s Office is in the process of conducting legal and policy analysis related to this recommendation. The Chancellor’s Office will also seek input from the colleges about this proposal. Based on this research and input, the Chancellor’s Office will determine an appropriate course of action.

BSA Recommendation 9:
The chancellor’s office should monitor community colleges for issues that may jeopardize accreditation. To the extent that the chancellor’s office believes it needs additional staff to accomplish this task, it should develop a proposal for the fiscal year 2015-16 budget cycle that identifies the specific activities it would undertake to find and correct issues that could lead to sanctions of the community colleges and identify the staffing level needed to conduct those activities.

CCCO Response: The 2014-15 State Budget provided the Chancellor’s Office with nine additional positions and $2.5 million in local assistance funds to provide greater oversight, intervention, and assistance to the colleges. These additional resources will allow the Chancellors’ Office to be more proactive in identifying when a college is struggling and then providing appropriate intervention and assistance. While not exclusively focused on accreditation deficiencies, much of this work will address issues that are critical to accreditation. The Chancellor’s Office is currently in the process of hiring these new staff and completing the contracts necessary to expend the local assistance funds. As the Chancellor’s Office works to implement these expanded functions, we are reviewing where additional resources might be needed in order to provide appropriate oversight and assistance to the colleges. Requests for additional resources to assist in these efforts will likely be proposed by our office in the 2015-16 budget process.

The full report can be accessed at the State Auditor’s website:

https://www.auditor.ca.gov/pdfs/reports/2013-123.pdf