

sending in July 2012, except for one (1) form letter this month to acknowledge receipt of my ACCJC Third Party Comment Form.

--Alvin Ja

----- Forwarded Message -----

From: "ajahjah@att.net" <ajahjah@att.net>

To: CHEA <chea@chea.org>; recognition@chea.org

Cc: Mayor Ed Lee <mayoredwinlee@sfgov.org>; Board of Supervisors <Board.of.Supervisors@sfgov.org>; Carol Griffeth <Carol.Griffiths@ed.gov>; Cathy Sheffield <cathy.sheffield@ed.gov>; Elizabeth Daggett <Elizabeth.Daggett@ed.gov>; Kay Gilcher <kay.gilcher@ed.gov>

Sent: Sun, May 5, 2013 6:05:52 AM

Subject: corrected version of my 3rd party comment re: ACCJC

I had omitted my comments regarding Section 12D and 12E in my May 4 submission. Here is the corrected version:

TO: CHEA

DATE: May 5, 2013

FROM: Alvin Ja

SUBJECT: Recognition Review for Accrediting Commission for Community & Junior Colleges (ACCJC) of WASC—Third Party Comment (*corrected 5-5-13 version*)

ACCJC is in egregious non-compliance with five of the six CHEA Recognition Standards (Sections 12A, 12B, 12C, and 12D of CHEA's *Recognition of Accrediting Organizations Policy and Procedures*) as follows:

12A. ADVANCES ACADEMIC QUALITY. Advancing academic quality is at the core of voluntary accreditation. "Academic quality" refers to results associated with teaching, learning, research, and service within the framework of institutional mission. To be recognized, the accrediting organization provides evidence that it has:

4. standards or policies that focus on educational quality while respecting the institution's responsibility to set priorities and to control how the institution or program is structured and operates, and that incorporate an awareness of how programs function within the broader purposes of the institution; and

5. standards or policies designed to foster desired or needed student achievement and that refer to resources only to the extent required for students to emerge from institutions or programs appropriately prepared, or to address health and safety in the delivery of programs.

ACCJC's threat of closure/show cause report does not take CCSF's academic quality as the core in its decision-making. ACCJC did not evaluate CCSF within the framework of CCSF's institutional mission. ACCJC has even forced the Board of Trustees to change the Mission Statement to reflect and impose ACCJC's own vision.

The core of ACCJC's sanction is based on financial and administrative/governance critiques. ACCJC failed to focus educational quality and egregiously violated the mandate to respect CCSF's responsibility to set priorities and to control how the institution is structured and operates.

12B. DEMONSTRATES ACCOUNTABILITY. The accrediting organization demonstrates public accountability in two ways. It has standards that call for institutions to provide consistent information about academic quality and student achievement and thus to foster continuing public awareness, confidence, and investment. **Second, the accrediting organization itself demonstrates public involvement in its accreditation activities for the purpose of obtaining perspectives independent of the accrediting organization.** Representatives of the public may include students, parents, persons from businesses and the professions, elected and appointed officials, and others. To be recognized, the accrediting organization provides evidence that it has implemented:

- 4. policies and procedures that include representatives of the public in decision making and policy setting**
- 6. policies or procedures that call for substantive and timely response to legitimate public concerns and complaints**

Aside from the mandatory acceptance of "third party comment" forms, ACCJC has not sought to get input from the community regarding its decisions in spite of the huge negative impact of its actions on the community. It has not acted out on any policies or procedures to hear public concerns/complaints, not to mention respond to such.

I have sent communications (starting in July 2012) to ACCJC to protest the threat of closure/show cause report. ACCJC has never responded to my concerns.

ACCJC has even gone so far as to try to muzzle (I believe successfully) any voices of dissent from duly-elected members of the Board of Trustees by threatening to "ding" CCSF for not speaking with "one voice".

Far from being accountable to, and far from respecting the sentiments and needs of the community and its students, ACCJC has acted as a law unto itself and is imposing its own vision and will on CCSF.

12C. ENCOURAGES, WHERE APPROPRIATE, SELF-SCRUTINY AND PLANNING FOR CHANGE AND FOR NEEDED IMPROVEMENT. The accrediting organization encourages, where appropriate, ongoing self-examination and planning for change. Such selfscrutiny and planning entail thoughtful assessment of quality (especially student achievement) in the **context of the institution's mission.** Encouragement of such selfscrutiny and planning should not be confused with solely a demand for additional resources, but rather should

enable institutions and programs to focus on effective ways to achieve their institution and program goals. Such self-scrutiny and planning are means to enhance the usefulness of accreditation to institutions and programs. To be recognized, the accrediting organization provides evidence that it has implemented standards or policies that:

1. stress self-examination and self-analysis by institutions or programs for planning, where appropriate, for change and for needed improvement, in the **context of institutional mission**;
2. **enable institutions and programs to be creative and diverse in determining how to organize themselves structurally, how best to use their resources, and what personnel and other policies and procedures are needed to attain their student achievement goals**;
3. encourage institutions or programs to innovate or experiment; and
4. **require the accrediting organization to distinguish clearly between actions necessary for accreditation and actions that are considerations for improvement.**

In addition to having forced the Board of Trustees to adopt a new Mission Statement, ACCJC has forced the Administration to discard the shared governance model of administration (creative /diverse structure) to an authoritarian (efficient) structure.

By failing to take academic quality as the core in its accreditation decisions, ACCJC fails to distinguish clearly between actions necessary for accreditation versus actions that are considerations for improvement

12D. EMPLOYS APPROPRIATE AND FAIR PROCEDURES IN DECISION MAKING. The accrediting organization maintains appropriate and fair policies and procedures that include effective checks and balances. The accreditation process includes ongoing participation by higher education professionals and the public in decision making about accreditation policies and procedures. To be recognized, the accrediting organization provides evidence that it has implemented standards, policies, or procedures that:

1. **require participation by higher education professionals and the public**;
2. **foster reasonable consistency in reviews of institutions or programs while respecting varying institution or program purposes and mission**;
3. **assure that the process to deny or remove accreditation is specified and fair, and inform the institution or program about the process to be used and actions that may be taken**;

ACCJC's conduct in the CCSF case is devoid of fairness and completely lacking in checks and balances. Other than accepting "third party comment" forms, ACCJC has excluded participation by the public/community. It has held a gun to the head (threatening "dings") of the Board of Trustees to silence dissent about the conduct of the

ACCJC and interim Administration. ACCJC's imperious mode of operation has created a reign of terror. It has led elected public officials to be reluctant to challenge ACCJC's agenda due to its power to shut CCSF down.

12E. DEMONSTRATES ONGOING REVIEW OF ACCREDITATION PRACTICES. Even as higher education institutions and programs undertake ongoing self-scrutiny to maintain and improve quality, accrediting organizations need self-scrutiny of their accrediting practices. Such review should also include **examination of the accreditor's impact on institutions** and **responsiveness** to the broader accreditation and higher education community. To be recognized, the accrediting organization provides evidence that it sustains ongoing:

- 1. critical self-review that can further responsiveness, flexibility, and accountability when the accrediting organization works with institutions, programs, and the public;**
- 2. initiatives that enhance the efficiency and effectiveness of services to institutions or programs;**
- 3. review of its value to the institution in its entirety and to the higher education community; and**

ACCJC appears to be incapable of critical self-review. Its threat of closure/Show Cause Order, despite CCSF's undeniable academic excellence and importance to the community shows that it lacks responsiveness, flexibility and accountability in dealing with CCSF and the San Francisco community. If ACCJC were capable of critical self-review, it would have long ago rescinded its Show Cause Order because it would have seen that its action was harming CCSF and the community that CCSF serves; it would have seen that its actions, instead improving the institution, would be hurting an institution with proven academic achievement.

ACCJC's handling of CCSF's accreditation shows that it has failed miserably in fulfilling CHEA's requirement that it "demonstrate the quality of their activities and the pertinence and value of their activities to higher education and the public interest."

I allege that ACCJC sees projection of its bureaucratic power and authority as being more important than the educational needs of our community and its students. ACCJC's actions are effectively reducing educational opportunity and access to an institution with excellent teachers and programs. ACCJC is a bureaucracy gone wild. I charge ACCJC with gross malfeasance its position of power as a gatekeeper to the public's access to quality education.

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