

XI. ACCJC Has Sanctioned California Community Colleges At a Rate Disproportionate to the Regional Accreditation Bodies Recognized by the Department of Education

Over the past 10 years, ACCJC has issued an astounding number of sanctions on California community colleges. Even though the California community college system has long been considered one of the finest in the world, ACCJC has issued more sanctions than any of the other five accrediting bodies. It has done this by misapplying Federal law, disregarding California public policy, and by focusing on extraneous issues which are mostly procedural in nature, instead of evaluating its member institutions on their practice of providing quality, affordable education. The purpose of accreditation is to ensure the quality of institutions to the student-consumer. ACCJC has lost sight of this.

California has one of the most effective community college systems in the country, with more than 110 colleges and 70 districts. Among the 50 states, California ranks 3rd in the percentage of 4 year degree holders that were previously enrolled at 2 year institutions.¹ In the 2010- 2011 academic year 65% of all 4 year college graduates in California were recorded as having previously attended a two-year institution.

California's track record with student debt is equally as impressive. In 2011, out of the 50 states, California ranked 46th lowest in student debt rates, with the the top place rank given to the state with the highest average debt and proportion of students with loans.² The prevalence of students attending community college is a huge contributor to that statistic. With the rate of tuition set by the state, California's community colleges are the most affordable from among the University of California, the California State University, private non-profit universities and colleges, and for-profit educational options.

In California's community colleges, classes cost a mere \$46 per unit. For UC students³, the cost per unit for a student taking 15 units per semester is approximately \$440 , for CSU that cost is approximately \$234, and private colleges are around \$1070⁴. In fact, the U.S.

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<http://www.insidehighered.com/news/2012/09/10/data-show-key-role-community-colleges-4-year-degree-production> (Attachment 11.A.)

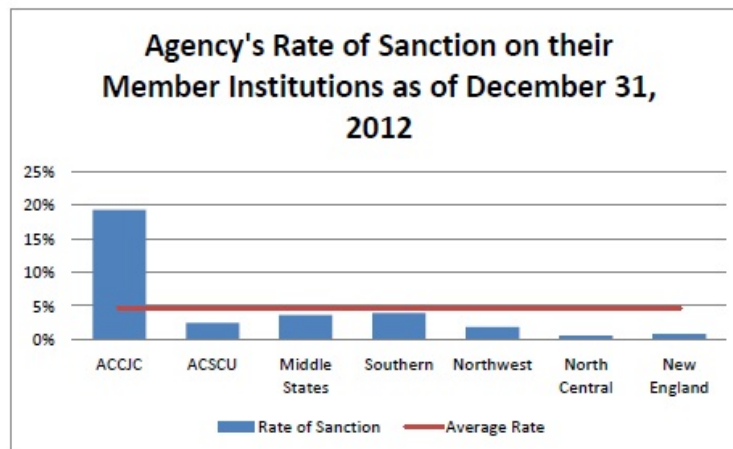
² Data Reported from the *Project on Student Debt*, available at : <http://projectonstudentdebt.org/files/pub/classof2011.pdf> (Attachment 11.B.)

³ The UC and CSU systems charge a flat rate of tuition for full-time enrollment. This number reflects the cost per unit given that a "full-time student" is taking 15 credit hours per semester.

⁴ Data for private college tuition retrieved from: <https://secure.californiacolleges.edu/finance/how-much-does-college-cost.asp> (Attachment 11.C.)

Department of Education’s College Affordability and Transparency Center Report on Public 2-year Higher Educational Institutions with the Lowest Tuition is essentially an uninterrupted list of California’s Community Colleges.⁵ For those students that attend community colleges for two years before obtaining their Bachelor’s degree, their cost of education can be cut dramatically, while simultaneously increasing educational opportunities and job prospects for the future. Moreover, students enrolled in certain community colleges and programs get special transfer admission access to four-year colleges. Altogether, California is considered the finest community college system in the world.

This stellar record makes it all the more unreal that California community colleges are sanctioned by the ACCJC at a rate unheard of in comparison to all other accrediting agencies. The disproportionate sanctions issued by ACCJC are a clue that something is wrong with the ACCJC. ACCJC’s sanctions of California’s exceptional community college system are inconsistent with the treatment of other community colleges which are evaluated by the other regional accreditors. One should reasonably expect the most effective community college system in the country to have the fewest sanctions when compared with the rest of the nation. Instead, the ACCJC has for a dozen years been the most aggressive accreditor, consistently sanctioning their member institutions at a rate in excess of 400% times the rate of the next highest sanctioning accrediting body. Over the last five years, that rate has, at times, exceeded 700%. As shown by the chart below, in 2012 no other Regional Accreditor sanctioned above 4% of the total number of their member institutions. For ACCJC, however, 19% of their member institutions were on sanction in 2012.⁶

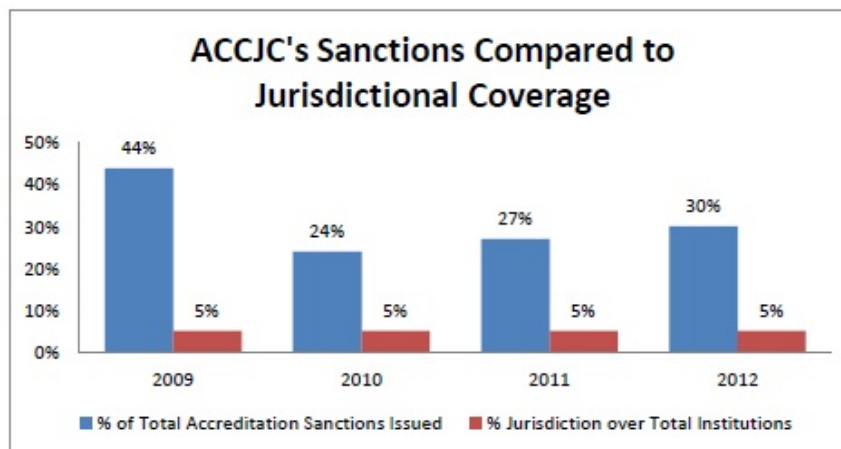
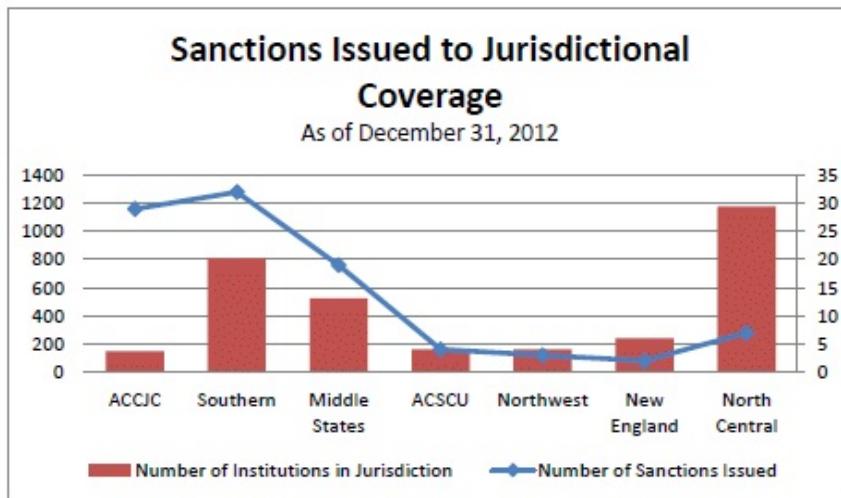


Equally as alarming is the share of total sanctions issued to higher education institutions,

⁵Report can be accessed by requesting the data set “Public, 2 Year” and “Lowest Tuition”, available at: <http://collegecost.ed.gov/cac/Default.aspx#> (Attachment 11.D.)

⁶Data for Chart gathered from Individual Regional Accreditor websites. Data Reflects the percentage of each agency’s member institutions on sanction as of December 31, 2012.

that the ACCJC is responsible for. ACCJC is the smallest regional accreditor in the United States. The institutions it accredits account for just 5% of all higher education institutions in the country. Despite this low number, the Commission is consistently responsible for issuing well above 20% of all the sanctions issued to higher education institutions each year. In 2009, the ACCJC issued an astounding 44% of the total sanctions given to higher education institutions.⁷⁸



⁷ Top Graph: Data gathered from individual Regional Accreditors' websites. The red bars show how many institutions each agency is responsible for monitoring, which can be found on the left side of the graph. The blue illustrates the number of all sanctions nationwide that each individual agency was responsible for issuing, counted for all institutions on sanction as of December 31, 2012. This number can be found on the right-side of the graph.

⁸ Bottom Graph: Data calculated for years 2009- 2011 is representative of ACCJC's self-reported numbers for total sanctions issued each year, compared to total sanctions issued as reported in Moody's Global Credit Research. "Accreditation Risks on the Rise for US Higher Education" Dec 18, 2012. Data from 2009-2011 was taken from each agency's self-reported numbers of total annual sanctions issued. Data from 2012 is a reflection of the total institutions each agency had on sanction as of December 31, 2012.

These astounding statistics are the result of several factors. Foremost, ACCJC judges institutions on criteria that go much farther than measuring how effective the colleges are at serving their students and providing quality, affordable education. The variables they have focused on betray an application of standards that promotes an ideological agenda inconsistent with the public policy of California, and the mission of the community colleges. ACCJC punishes colleges which fail to fall in line. Their actions violate California and Federal law, and are the product of serious conflicts of interest. Accreditation is a mechanism which depends on assuring quality to student-consumers. Promoting specific educational ideals that do not speak to these issues is not, and should not be the prerogative of accreditation.

XXI. ACCJC's Sanctions are not linked to Educational Quality

The apparent lack of a link between educational quality and the institutions that are given the ACCJC stamp of approval is further highlighted when viewing the performance recorded by various California community colleges amongst many measures of "student success." Many of the California Community Colleges that consistently outperform their peers in completion rates and average GPAs upon transfer have been sanctioned at some point. Alternatively, of the few colleges that have escaped a sanction from the Commission, many have performed consistently below average in the same categories. It is clear from observing this data, that ACCJC is unconcerned with the actual education that institutions are delivering when making their accreditation decisions. CCSF serves as a great example of this bizarre pattern.

CCSF is above average in the primary statistical measures used by the State to evaluate student success in the community colleges. These are: *transfer velocity*, the *average GPAs of their transfer students in the California State University System*, *completion rate for college prepared students*, *completion rate for college unprepared students*, and *total completion rate*. (See Attachment 2.B.)

- Among the California community colleges, the average transfer velocity to 4 year institutions is 38.2%. But CCSF's transfer velocity is 48.1%, placing it in the top 12 percent of California Community Colleges.
- For those California community college transfer students who attend CSUs, the average GPA was 3.03 for the Fall 2011 semester. City College's student who transferred to CSU's was above average compared to their peers in that category, maintaining an average 3.08 GPA in the Fall 2011 semester.
- CCSF also maintains higher than average completion rates for its college-prepared students. In the category of completion rate for college-unprepared students, City College is admirably in the top 3% of all California Community Colleges.
- For total completion rates CCSF is in the 83rd percentile of all CCCs - the top

20%.

CCSF is in rare company. Of the 112 California community colleges only 21 colleges are above average in each of the categories of: transfer velocity; GPA of transfer students at CSU; Completion Rate for College Prepared Students; Completion Rate for College Unprepared Students; and total Completion Rate. Of these 21 colleges, 8 (38%) have been on sanction at some point in the past ten years. Two of these high performing schools have been placed on show cause (City College and Diablo Valley)⁹. (See Attachment 2B, and 11.E.)

<u>College</u>	<u>Transfer Velocity</u>	<u>GPA of transfer students at CSU</u>	<u>Completion Rate for College Prepared</u>	<u>Completion Rate for College Unprepared</u>	<u>Total Completion Rate</u>	<u>Sanction History</u>
College Canyons	Above Average	Above Average	Above Average	Above Average	Above Average	No
Foothill	Above Average	Above Average	Above Average	Above Average	Above Average	No
LA Pierce	Above Average	Above Average	Above Average	Above Average	Above Average	No
Las Positas	Above Average	Above Average	Above Average	Above Average	Above Average	No
Monterey	Above Average	Above Average	Above Average	Above Average	Above Average	No
Sacramento City	Above Average	Above Average	Above Average	Above Average	Above Average	No
San Diego City	Above Average	Above Average	Above Average	Above Average	Above Average	No
San Diego Mesa	Above Average	Above Average	Above Average	Above Average	Above Average	No
Santa Monica	Above Average	Above Average	Above Average	Above Average	Above Average	No
West Valley	Above Average	Above Average	Above Average	Above Average	Above Average	No
Cerro Coso	Above Average	Above Average	Above Average	Above Average	Above Average	Yes
Diablo Valley	Above Average	Above Average	Above Average	Above Average	Above Average	Yes
Glendale	Above Average	Above Average	Above Average	Above Average	Above Average	Yes
Ohlone	Above Average	Above Average	Above Average	Above Average	Above Average	Yes
Pasadena	Above Average	Above Average	Above Average	Above Average	Above Average	Yes

⁹ For a ten-year history of sanctions on the California community colleges, see Attachment 11.E.

San Diego Mira	Above Average	Above Average	Above Average	Above Average	Above Average	Yes
San Francisco	Above Average	Above Average	Above Average	Above Average	Above Average	Yes
Santa Barbara	Above Average	Above Average	Above Average	Above Average	Above Average	Yes

*Reflects the results of the 2011-12 Academic Year

Additionally, of the 112 California community colleges only 26¹⁰ colleges have both above average transfer rates, and students who maintain above average GPAs after transferring to a CSU (compared to their community college transfer peers). Yet, over 50% of these high performing institutions (14 of 26)¹¹ have been sanctioned by ACCJC at some point in the past ten years. (See Attachment 2B, and 11.E.)

Conversely, of the 39 California community colleges that have not been sanctioned in the last 10 years, it is evident that student performance, completions, and learning are **not** linked to the Commission’s opinion of how well the institution is being run. In fact, **six of these colleges are below average in every single category** (American River, Butte, Citrus, Consumnes River, Mendocino, San Bernardino), and an additional 11 are below average in 4 out of the 5 categories.¹² This begs the question, what exactly, does the ACCJC view in these unscathed colleges as evaluative criteria excellent enough to avoid their notorious, overzealous sanctioning?

<u>College</u>	<u>Transfer Velocity</u>	<u>GPA of transfer students at CSU</u>	<u>Completion Rate for College Prepared</u>	<u>Completion Rate for College Unprepared</u>	<u>Total Completion Rate</u>
Allan Hancock	Below Average	Below Average	Below Average	Below Average	Above Average
American River	Below Average	Below Average	Below Average	Below Average	Below Average
Antelope Valley	Below Average	Above Average	Below Average	Below Average	Below Average
Bakersfield	Above Average	Below Average	Above Average	Below Average	Below Average
Butte	Below Average	Below Average	Below Average	Below Average	Below Average

¹⁰These colleges are Cerro Coso, Diablo Valley, Fresno City, Glendale, MiraCosta, Mission, Moorpark, Ohlone, Palomar, Pasadena, San Diego Miramar, CCSF, Santa Barbara , Sierra, College of the Canyons, Folsom Lake, Foothill, LA Pierce, Las Positas, Monterey, Mt. San Antonio, Sacramento City, San Diego City, San Diego Mesa, Santa Monica, and West Valley

¹¹ These colleges are Cerro Coso, Diablo Valley, Fresno City, Glendale, MiraCosta, Mission, Moorpark, Ohlone, Palomar, Pasadena, San Diego Miramar, CCSF, Santa Barbara , and Sierra

¹² These 11 colleges below average in four categories are Alan Hancock, Antelope Valley, Chaffey, Contra Costa, Desert, Gavilan, LA Mission, LA Valley, Los Medanos, Mt. San Jacinto, Siskiyou, and West Hills Lemoore.

College Canyons	Above Average	Above Average	Above Average	Above Average	Above Average
Chabot	Above Average	Below Average	Above Average	Above Average	Above Average
Chaffey	Below Average	Below Average	Above Average	Below Average	Below Average
Citrus	Below Average	Below Average	Below Average	Below Average	Below Average
Coastline	Below Average	Above Average	Above Average	Below Average	Above Average
Contra Costa	Below Average	Below Average	Below Average	Below Average	Above Average
Consumnes River	Below Average	Below Average	Below Average	Below Average	Below Average
Cuyamaca	Below Average	Below Average	Below Average	Above Average	Above Average
DeAnza	Above Average	Below Average	Above Average	Above Average	Above Average
Desert	Below Average	Above Average	Below Average	Below Average	Below Average
Folsom Lake	Above Average	Above Average	Above Average	Below Average	Below Average
Foothill	Above Average	Above Average	Above Average	Above Average	Above Average
Gavilan	Below Average	Average	Below Average	Below Average	Below Average
Golden West	Above Average	Below Average	Below Average	Above Average	Above Average
Grossmont	Above Average	Below Average	Below Average	Above Average	Above Average
LA Mission	Below Average	Below Average	Above Average	Below Average	Below Average
LA Pierce	Above Average	Above Average	Above Average	Above Average	Above Average
LA Valley	Below Average	Below Average	Above Average	Below Average	Below Average
Lake Tahoe	Below Average	Above Average	Above Average	Below Average	Above Average
Las Positas	Above Average	Above Average	Above Average	Above Average	Above Average
Los Medanos	Below Average	Below Average	Above Average	Below Average	Below Average
Mendocino	Below Average	Below Average	Below Average	Below Average	Below Average
Monterey	Above Average	Above Average	Above Average	Above Average	Above Average
Mt. San Antonio	Above Average	Above Average	Above Average	Below Average	Above Average
Mt. San Jacinto	Below Average	Above Average	Below Average	Below Average	Below Average
Napa	Above Average	Below Average	Above Average	Above Average	Above Average

Sacramento City	Above Average	Above Average	Above Average	Above Average	Above Average	Above Average
San Bernadino	Below Average	Below Average	Below Average	Below Average	Below Average	Below Average
San Diego City	Above Average	Above Average	Above Average	Above Average	Above Average	Above Average
San Diego Mesa	Above Average	Above Average	Above Average	Above Average	Above Average	Above Average
Santa Monica	Above Average	Above Average	Above Average	Above Average	Above Average	Above Average
Santa Rosa	Below Average	Above Average	Above Average	Above Average	Above Average	Above Average
Skyline	Above Average	Below Average	Above Average	Above Average	Above Average	Above Average
West Hills Leemore	Below Average	Above Average	Below Average	Below Average	Below Average	Below Average
West Valley	Above Average	Above Average	Above Average	Above Average	Above Average	Above Average

*Reflects the results of the 2011-12 Academic Year

These 39 California community colleges represent all the CCCs that have not been sanctioned at any point within the past ten years. That equates to a mere 34% of total California community colleges– little more than a third. One would hope that if a vast majority of the California community college system was on sanction, that at least those colleges that remained untouched– the supposed examples for the rest of the system– would be besting their fellow institutions in terms of the actual education that they deliver to their students. However, this is not the case.

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