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Congress of the United States
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TASK FORCE
Vice Chair

June 6, 2014

Board of Directors
Accrediting Commission for Junior and
Community Colleges
10 Commercial Boulevard, Suite 204
Novato, CA 94949

Dear Board of Directors:

I write to urge you to extend the deadline so that City College of San Francisco may retain its accreditation and complete its transformative process. I believe that the actions of the ACCJC to date threaten not only the existence of City College but also the ACCJC itself.

The recent letter from the United States Department of Education to Congresswoman Pelosi clearly demonstrates that the ACCJC has the authority to extend the deadline. The ACCJC claimed otherwise in its response, stating that a two year clock on the loss of accreditation started ticking in 2006.

The timeline from when the college was out of compliance could not reasonably be interpreted to be 2006. The ACCJC itself extended accreditation to City College in 2006, and for more than two years. How could an institution be accredited for more than two years at the same time that a two year clock began ticking? It makes no sense.

I think that the danger to the ACCJC's credibility, and thus to its own accreditation, arises from capricious interpretations of its own procedures. As just one of many examples, and as noted in the August 2013 letter from the department, on page 4 in the first complete paragraph, the department expressed a concern that the ACCJC was using the word "recommendation" in 2006 to mean both an area of noncompliance with standards and to indicate areas for improvement. Noncompliance has a two year clock on correction. Areas for improvement do not. The department stated that this lack of clarity "...impacts the agency's ability to provide institutions with adequate due process." Indeed it does and that would clearly be an error.

Errors are grounds for extending the deadline, as noted in the letter to Congresswoman Pelosi when the department stated that, "...an agency may, as permitted by its established policies and procedures, correct any errors it has made, respond to an improvement in institutional performance, and adopt or change its policies with regard to its oversight of the institutions it accredits." The letter continues by noting that the department would want to ensure that the

accrediting agency is still a "reliable authority" as to the quality of education. Surely it would boost the perception of reliability if the ACCJC conceded its mistakes and took actions to reverse them.

City College of San Francisco is an outstanding educational institution that deserves accreditation. I urge the ACCJC to come into compliance with the US Department of Education's interpretation of the department's own regulations, and to work with City College to keep City College open.

All the best,

A handwritten signature in black ink, appearing to read "Jackie Speier", with a long horizontal flourish extending to the right.

Jackie Speier

KJS/bp