

FACULTY ASSOCIATION OF



CALIFORNIA COMMUNITY COLLEGES

**TESTIMONY OF JONATHAN LIGHTMAN TO NACIQI
DECEMBER 16, 2015**

Thank you Madam Chair and members.

My name is Jonathan Lightman and I serve as executive director of FACCC, the Faculty Association of California Community Colleges. We are a 63 year-old statewide professional membership association for the faculty of the California Community College system. In September, we filed a third party written comment and I would refer you to that document for a more thorough understanding of our concerns.

Today, I will focus on compliance with two regulations, 602.19(b) on monitoring and evaluation of institutions and programs, and 602.20(a) on enforcement of standards. While both allow for flexibility, they are predicated on appropriate judgment in the implementation. It is our belief that the approach of ACCJC, not just in regard to City College of San Francisco, but to the California Community Colleges as a whole, suggests a problem of judgment in compliance with these regulations.

Section 602.19(b) states that the agency must have in place a monitoring and evaluation process that can identify and address problems **and that takes into account institutional program strengths and stability**. I would encourage you to review the sanctions levied in the past decade and determine if institutional strengths and stability, especially in the core areas of teaching and learning, were taken into account.

From our vantage point, we can see the devastating impact on both enrollment and reputation of sanctioned colleges in both urban areas, like San Francisco, as well as rural colleges like Cuesta, Redwoods, and Sequoias. While FACCC does not have members in American Samoa, we can just imagine the impact of the Show Cause order on the American Samoa Community College, located in a place without significant higher education options.

Regulation 602.20(a) also provides the accrediting agency with latitude in implementation but this too requires consistency in application and appropriate judgment in enforcement. The California State Auditor highlighted this as a major problem in its report of 2014.

FACCC is extremely concerned with the overall diversion of resources in this process resulting in litigation, legislation, audits, task forces, hearings, and reports—all of which would be better directed toward educating students.

We are also deeply troubled by the perceived threat of retaliation on the part of ACCJC against those who criticize them. To address this concern, I am pleased to announce that Governor Brown just signed into law California Assembly Bill 404, a FACCC-sponsored proposal, requiring the Chancellor of the California Community Colleges to survey stakeholders in our system on the compliance of our regional accreditor with federal law in advance of a NACIQI hearing, and to transmit that data to you. We hope you will find this information useful and that other states will adopt similar processes.

In the meantime, FACCC believes the overwhelming evidence demonstrates a serious breach by the ACCJC of both the letter and spirit of the law. We urge you to take the appropriate remedy in the interests of our communities, our institutions, and our students.

Thank you for your consideration.