



CHAIR, ACADEMIC SENATE
RIVERSIDE DIVISION
UNIVERSITY OFFICE BUILDING, RM 225

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September 9, 2026

Susannah Scott, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

RE: Systemwide Review of Proposed Federal Accreditation Regulations

Dear Susannah,

This letter transmits the comments from the Riverside Division regarding the subject proposed federal regulation changes. Letters from local committees are attached and summarized below. As you may suspect, committees indicated that the review timeframe prevented them from conducting a comprehensive review of the proposal.

The divisional Executive Council reviewed both the proposed changes and the comments from local committees. Council members amplified comments made by local committees, especially those regarding the proposed changes' potential disruption with professional accreditors and its aims to prohibit diversity, equity, and inclusion standards. Such disruptions and impacts threaten UCR's capacity to assist all students, have effective student retention mentorship and support programs.

The Committee on Educational Policy spoke to the risk that facilitating easier switching between accreditors will lead to "accreditor shopping" and the subsequent dilution of quality standards. CEP also cautions that alterations to transfer credit policies are likely to enroll unprepared students in courses, thereby increasing failure rates and placing an undue burden on instructors. Regarding program evaluation, the committee argues that focusing on short-term economic returns imposes unnecessary administrative strain while ignoring the societal value of public service careers, for which salary is a poor measure of success. Furthermore, they view the requirements regarding "intellectual diversity" as an encroachment on academic freedom and institutional governance, noting that quantifying such perceptions is both costly and subjective. Additionally, the committee objects to classifying prison education programs as a substantial change given their existing oversight and warns that the mandate to evaluate student outcomes without demographic data will hinder the institution's ability to address persistent inequalities.

UCR Committee on the Academic Freedom members raise three major concerns regarding the policy changes. Including that the proposed rules are too vague and lack sufficient detail to be effectively reviewed or implemented, noting that undefined terms and the potential for critical details to be added later without public review make informed critique impossible. Second, UCR CAF contends that the proposals undermine meritocracy and academic freedom by appearing to leverage accreditation as a mechanism to impose viewpoint quotas on faculty hiring, which they argue interferes with institutional autonomy and the faculty's collective ability to pursue rigorous research and education. Finally, they strongly object to the proposed removal of the peer review requirement, warning that allowing evaluators without proper pedagogical

training or scientific background in the field risks lowering the quality of evaluations and eroding academic standards, and they maintain that peer review is essential to effective institutional assessment.

Members of the Committee on Preparatory Education identified a fundamental conflict regarding how the proposed accreditation regulations define educational success. They point out that the proposal pressures institutions toward a model that prioritizes efficiency and cost-effectiveness by focusing on metrics like rapid completion and economic return, while potentially undermining a model that emphasizes student development and institutional investment for students with varying levels of preparation. For institutions with large populations requiring preparatory education, these new standards could create significant pressure to accelerate students through coursework or reduce essential preparatory requirements to meet metrics, even when additional academic support is warranted. Consequently, the committee suggests that institutions would need to gather considerable evidence to justify their preparatory work as essential to their educational mission and to demonstrate that it leads to measurable student achievement gains to succeed within the new accreditation framework.

Committee on Undergraduate Admissions members express significant concerns that the proposed federal accreditation regulations threaten academic freedom, institutional autonomy, and diversity initiatives at UCR. Regarding academic freedom, the committee warns that excluding "non-germane" classroom speech from federal protections exposes faculty to disciplinary actions or termination through internal reviews, while mandatory routine performance evaluations create pressure to avoid certain speech to maintain university funding. These mandates also risk damaging institutional governance and the academic senate's oversight of faculty and curriculum. Regarding diversity, the committee objects to the requirement to measure "intellectual diversity" through perception surveys, characterizing this as federal interference in faculty hiring and academic practices. Furthermore, the prohibition of DEI standards threatens UCR's equity efforts as a federally designated Hispanic-Serving Institution and AANAPISI, potentially undermining support for disadvantaged students. Operational and financial concerns include the tightening of resource-sharing rules, which may increase compliance costs for professional programs and disrupt their specialized accreditation. Finally, regarding students, the committee warns that evaluating program value based on immediate economic returns could jeopardize funding for humanities and public service fields. They also fear that expanded credit-acceptance rules will force the university to accept unprepared transfer students, while the mandatory 15-day written justification window for denied transfer credits creates an overwhelming administrative burden that could delay degree audits and financial aid.

UCR School of Education Faculty Executive Committee identified four primary concerns regarding the proposed federal accreditation regulations. First, they note that the requirement for written notice regarding denied transfer credits creates an undue administrative burden for schools with high transfer populations. Second, regarding student outcomes, they argue that prioritizing graduation metrics may negatively impact support for underserved groups, while ignoring demographic data masks critical inequities. They further caution that using graduate earnings as a quality metric is problematic for public-service professions. Third, they express concern that mandates regarding "intellectual diversity" could infringe upon faculty autonomy in curriculum and research. Finally, they worry that proposed restrictions on accreditors may hinder essential consultation with professional associations and field experts, potentially disconnecting standards from current research and practice.

The School of Business Faculty Executive Committee points out that the proposed federal regulations mandate that institutions measure and prioritize "intellectual diversity," a requirement that would impinge upon academic freedom by forcing faculty to balance ideological viewpoints rather than relying on rigorous academic standards. This is in contrast to University defined academic freedom standards that emphasize instructor autonomy and scholarly judgment within faculty fields of competence.

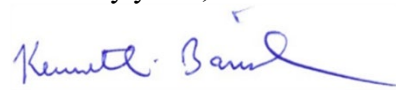
Our College of Humanities, Arts, and Social Sciences Faculty Executive Committee expresses deep concern regarding the proposed federal accreditation regulations, citing several major issues. They argue that "educational and economic return" metrics systematically disadvantage humanities, arts, and certain STEM fields by labeling them "low value," which reduces education to vocational training and threatens the stability of low-enrollment programs by eliminating shared governance protections. Also, the committee contends that proposals to measure "intellectual diversity" through political polling exceed the Department's statutory authority, forcing accreditors to assess individual beliefs rather than institutional structures, thereby infringing on academic freedom and introducing a partisan agenda. Further, the committee warns that lowering barriers to entry for accreditors will create conditions for "accreditor shopping," where institutions could switch to ideologically aligned or permissive agencies, ultimately degrading the uniform rigor of accreditation. They also characterize the inclusion of First Amendment rights and program content in the regulations as overreach, asserting these are unrelated to core educational functions, while also criticizing the move to replace "self-study" requirements with less defined evaluative approaches. Finally, the committee deems the 30-day public review period for an 82-page document unreasonable, noting that their own two-day internal review window was similarly inadequate.

The College of Natural and Agricultural Sciences Faculty Executive Committee chair was able to respond in the short timeframe and provided the feedback that two topics that jump out as the most troubling. First, they fear that mandates for instructional staffing flexibility threaten the tenure system, as institutions with robust tenure protections might be unfairly penalized for lacking the ability to rapidly terminate faculty during enrollment declines. Second, the committee warns that making peer review optional in the accreditation process is dangerous because it leaves the process vulnerable to external pressure, potentially allowing agencies to prioritize the agendas of appointed staff over the specialized expertise of faculty.

The School of Medicine Faculty Executive Committee is concerned that the proposed regulations shift accreditation from a peer-review quality control model to a hybrid system dominated by market forces and government oversight. The committee warns that this change would exclude professional societies like the AAMC and AMA from the process and allow medical education quality to be defined by entities lacking medical expertise. Additionally, the committee critiques the potential for competition among accreditors based on price rather than subject matter expertise, as well as the requirement to prioritize program outcomes and economic returns. Finally, the committee objects to the mandate that accreditors assess institutions on vaguely defined concepts such as academic freedom, free speech, and intellectual diversity, which they note are often subject to problematic interpretations.

I trust this feedback will support the review and comment period for the University's comments on this important issue.

Sincerely yours,



Kenneth Barish

Professor of Physics and Astronomy and Chair of the Riverside Division

CC: Monica Lin, Executive Director of the Academic Senate
Michael Labriola, Assistant Director of the Academic Senate (Academic Council)
Cherysa Cortez, Executive Director of the UCR Academic Senate



Academic Senate

COMMITTEE ON ACADEMIC FREEDOM

September 4, 2026

To: Ken Barish, Chair
Riverside Division Academic Senate

From: Andrew Ridgwell, Chair
Committee on Academic Freedom

Re: Request for Comment on Proposed Accreditation Regulations

The Committee on Academic Freedom (CAF) reviewed the proposed revisions to the Federal Accreditation Regulations by email. The Committee could not conduct a full review of the proposal due to the short time frame given for review outside of an academic quarter.

Three members responded with the following feedback:

1. Lack of details and specifics in the proposed policy changes precludes necessary oversight. The proposed rule changes are too vague in many places to be adequately reviewed or workable in practice. For instance, on Page 53956: *"We propose to require a recognized accrediting agency to establish a policy that is designed to support, promote, and appropriately prioritize intellectual diversity and the free exchange of ideas amongst faculty, to include elements that address intellectual inquiry and student learning, and measures student and faculty perceptions on the range of viewpoints and perspectives offered by the institution or program ..."* What constitutes 'appropriate prioritization' of 'intellectual diversity'? How will this 'prioritization' be implemented? How will 'intellectual inquiry and student learning' be 'addressed'? How will 'student and faculty perceptions' be 'measured'?

Instead, a wording such as this would be simpler and more workable: *"We propose to require a recognized accrediting agency to establish a policy that is designed to support and promote the free exchange of ideas amongst faculty"*.

The lack of specifics is particularly troublesome in that potentially critical details will apparently be added later, meaning that this information is not subject to (the current) open review and comment processes. Specifically, we note: "The Department proposes adding more details to an agency's required accreditation requirements with regard to educational objectives, student success, faculty performance and evaluation, facilities, academic freedom, and intellectual diversity." (Page 53993)

(Also see (Page 53946) – *"The Department discusses substantive issues under the sections of the proposed regulations to which they pertain. Generally, we do not address proposed regulatory provisions that are technical or otherwise minor in effect. The Department may to release subregulatory guidance as a compliment to the regulations because E.O. 14279 requires that the Department 'update the Accreditation Handbook to ensure that the accreditor recognition and*

reauthorization process is transparent, efficient, and not unduly burdensome.’’ The Department may provide subregulatory guidance in the Accreditation Handbook on areas like student engagement, site visits, complaint processes, faculty structure and evaluation. We also intend to clarify terminology such as peer review and evaluation teams in the Accreditation Handbook as well.’’)

Proposed changes to the regulations and definitions of key terminology, must be available in their entirety. The current presentation of incomplete and insufficiently described rule changes renders fully informed and critical review, and meaningful comment, impossible.

2. Proposed policy changes undermine, not strengthen, meritocracy and academic freedom

Of greater concern is whether the rule changes are intended to provide a mechanism (institution accreditation) to force specific changes in faculty hiring. On Page 54008 (our emphasis), institutions are to be evaluated on whether they maintain “(viii) A policy that is designed to support, promote, and appropriately prioritize intellectual diversity and the free exchange of ideas amongst faculty, to include elements that address intellectual inquiry and student learning, and measures student and faculty perceptions on the range of viewpoints and perspectives offered by the institution or program ...”. If hiring policies are changed in order to meet the accreditation expectation to ‘*appropriately prioritize intellectual diversity*’ (also Page 53956) then hiring would be no longer purely merit-based. Furthermore, on Page 53946 (our emphasis): “*The Department may provide subregulatory guidance in the Accreditation Handbook on areas like student engagement, site visits, complaint processes, faculty structure and evaluation*’. Then on Page 53958, in offering a definition of ‘Academic Freedom’: “*Nothing in this definition shall be construed to prohibit institutions or accrediting agencies from adopting and enforcing policies reasonably designed to promote intellectual diversity ...*”.

Taken together, the intention appears to be that future guidance will require some sort of viewpoint quota amongst faculty based on the as yet to be defined ‘evaluation’ process. Irrespective of the attempt to define ‘Academic Freedom’ so as to allow for imposed viewpoints and hiring, it is clearly counter to any other reasonable definition. Academic Freedom is greater than the individual and encompasses the institution as a whole. It is the freedom of the faculty as a whole to pursue the best research and education for the institution that is most infringed by enforced changes to ‘*faculty structure*’.

We propose that amendments to the rule changes should reinforce, not undermine, the agency and freedom of institutions to conduct merit-based hiring. In the context of the proposed rule change on 54008, institutions should maintain “(viii) *A policy that is designed to support and promote the free exchange of ideas amongst faculty ...*” (remove ‘*appropriately prioritize intellectual diversity*’).

3. Proposed policy changes undermine ‘Gold standard’ peer review

We strongly object to the proposed removal of the requirement for ‘peer review’. We believe this would actively undermine and erode the Administrations ambition for ‘Gold standard’ in academia and be detrimental to academic freedom.

On page 53948: “*The Department proposes to remove the requirement for peer review from the definition of an “accrediting agency or agency” based on a recommendation from several negotiators. During negotiated rulemaking, non-Federal negotiators argued that accrediting agencies may wish to include professionals and experts on site visit teams who do not directly fit within the strictest meanings implied by the word “peer” or “peer reviewers.” The negotiators*

requested, in order to ensure flexibility for agencies and facilitate quality site reviews, for the Department to eliminate the reference to peer reviews. ... We concur with the negotiators in their arguments that subject matter expertise does exist outside of the peer review process; other individuals or groups may have similar, if not more, subject matter expertise that allows them to be an effective evaluator of the quality of an institution or program.”

And Page 53947: *“The proposed regulations amend the definition of an ‘accrediting agency or agency’ to remove the stipulation that accrediting activities must be conducted through peer review.”*

Familiarity with ‘subject matter’ may well lie outside of our ‘peers’, but that does not ensure that ‘*individuals or groups*’ will follow good science and practice and in a way that does not infringe on academic freedom. For instance, would a podcaster who created episodes on the dangers of GM crops and interviewed activists, be an appropriate reviewer for the balance of material in an agricultural program? In such an example the podcaster would have familiarity with the subject matter, but not so much with the scientific process or reviewing, nor formal pedagogical training. Subject matter expertise is a necessary, but clearly insufficient requirement, for effective evaluation.

The rule changes opens the door to poorer scientific and educational outcomes, not better ones, and that the requirement for ‘peer review’ must be retained.



Academic Senate

COMMITTEE ON EDUCATIONAL POLICY

September 4, 2026

To: Ken Barish, Chair
Riverside Division

From: Jennifer Nájera, Chair
Committee on Educational Policy

Re: Request for Comment on Proposed Accreditation Regulations

The Committee on Educational Policy (CEP) reviewed the proposed changes to the Federal Accreditation Regulations by email. The five committee members who responded noted that the short time frame provided did not allow them the opportunity to review the DOE proposal as carefully as they would have otherwise. Furthermore, given that we received these documents during the summer, we did not have as robust participation as we might have received during the regular academic year.

Five members of CEP responded and were generally supportive of the draft comments from UCR. The following reflects members' additional feedback on the DOE report itself:

- Accreditor Competition & "Regional" Terminology Elimination (§ 600.11, § 602.11, § 602.12) and facilitating easier switching could lead to "accreditor shopping" and a dilution of institutional quality standards over time.
- Changes to the transfer of credit policies are likely to result in transfer students enrolling in courses for which they do not have adequate preparation. This increases the burden for instructors to support these students and increases the likelihood of student failure in these courses.
- The Economic Returns & Program Evaluation (§ 602.17(a)(1)) 1) would create significant administrative burden and 2) considering only economic returns at a short-term does not adequately consider quality of life benefits of lower-paid careers or careers that require time to build.
- Concern was noted with salary measurement as a component of program effectiveness as it is a problem for faculty training students for public service professions, which are typically lower-paid. Many productive citizens are not adequately compensated for their societal contributions, and many destructive professionals are overcompensated. Salary is a poor measurement of educational success.
- Concern was noted with Faculty Performance & Intellectual Diversity Standards (§ 602.17(a)(2)) as accreditors measuring or evaluating "perceptions of viewpoint diversity" will encroach on institutional governance, academic freedom, and UC system policies. Additionally, there is significant operational cost and potential subjectivity of attempting

to quantify, survey, or measure "intellectual diversity" across diverse academic departments.

- Section 34 CFR § 602.22(a)(1)(ii)(I) & (C) — Substantive Change Approval for New Locations and Programs –does not provide adequate evidence to support considering prison education programs (PEP) be considered a substantial change. These programs are already subject to substantial oversight.
- Concerns were noted on the "mandate that accrediting agencies require member institutions to use data on program-level student outcomes to improve such outcomes, without reference to race, ethnicity, or sex." This constrains UCR's ability to address persistent inequalities in many programs.

The comments below specifically address the UCR response to the DOE document:

- One committee member recommended that the UCR response to "Intellectual Diversity" be re-phrased to make a more compelling argument. Another member noted concern with UCR's response on "intellectual diversity" that it could include "debunked scientific theories", "misguided interpretations", or false claims as it could create bias against universities as caring more about social justice than education.
- A recommendation was made to include a statement about the true aim of a university education and a statement about the dangers of giving accreditors undue powers.



Academic Senate

COMMITTEE ON PREPARATORY EDUCATION

September 4, 2026

To: Kenneth Barish, Chair
Riverside Division

From: Agnieszka Jaworska, Chair
Committee on Preparatory Education

Re: **[Systemwide Review] Proposed Accreditation Regulations**

While the Committee on Preparatory Education did not reach a quorum to issue a formal committee response on the Proposed Accreditation Regulations, input was gathered from two members. Their comments on the proposal are as follows:

For an institution where a large percentage of students require preparatory education, the proposal raises a fundamental question about how educational success will be defined.

Two models are at issue:

Model 1: A successful university admits students who are already prepared to succeed and moves them through a degree quickly and cheaply.

Model 2: A successful university admits students with substantially different levels of preparation and effectively educates them to the level required for the degree, even when doing so requires additional coursework, time, and institutional investment.

The proposal does not explicitly choose between these models. Its recognition of institutional mission and differentiated standards leaves room for the second. However, its emphasis on completion, economic return, cost, program length, and innovation creates pressure toward the first model unless an institution can make a strong evidence-based case for the second. The Department itself recognizes that new student-outcome standards could lead institutions to change or close programs that do not meet them (p. 53980).

For an institution with a large population requiring preparation, this would multiply the already existing pressure to reduce preparatory requirements, accelerate students into regular coursework, maximize transfer credit, or otherwise shorten the path to the degree—even where additional preparation is academically warranted. Considerable effort would be necessary to ensure that the accreditation framework recognizes the educational work required to bring students who enter at different levels of preparation to the same academic standard. UCR—or any institution with a very large population needing preparation—would need to establish, with evidence, that preparatory

education is an essential part of its educational mission, that it produces measurable gains in student achievement, and that the amount and form of preparation it provides are academically justified.



Academic Senate

COMMITTEE ON UNDERGRADUATE ADMISSIONS

September 4, 2026

To: Kenneth Barish, Chair
Riverside Division

From: Kelly Huffman-Neal, Chair
Committee on Undergraduate Admissions

Re: **[Systemwide Review] Proposed Accreditation Regulations**

While the Committee on Undergraduate Admissions did not reach a quorum to issue a formal committee response on the Proposed Accreditation Regulations, input was gathered from two members. Their comments on the proposal are as follows:

Upon review of the NPRM from Dept Education, there are some significant concerns facing UC generally and UCR specifically.

Noted threats to Academic Freedom/UCR decision making

In the document, “Non-germane” classroom speech (anything not directly pertaining to the subject matter) is explicitly excluded from federal academic freedom protections. For example, if a professor uses class time in a nonpolitical subject, something like calculus or chemistry, to talk about politics, the current administration could classify that speech as “non-germane.” This would allow the faculty member to be held responsible for misuse of class time. Since this ‘germane’ rule falls outside federal academic freedom protections, it means institutions could discipline or maybe even fire faculty (non-tenured) through “internal performance reviews” channels without violating federal academic freedom guidelines. While overt firing for political speech in academia remains unconstitutional, this document introduces ways that faculty could be made more vulnerable.

These proposed rules require that University accreditors require colleges to conduct routine performance evaluations for all faculty. Again, while political speech can’t be listed as direct cause for firing, these type of “evaluations” could be negative and can note professional conduct or germane speech as cause for some kind of discipline. This document implies that if a university fails to conduct the faculty evaluations or follow the new ‘free-speech policies’, the university risks losing its accreditation, which would risk its ability to receive funding from the government.

Potential impact on UCR: For a public research university like UCR, these mandates might damage UCR’s self-governance and the power that the academic senate has over faculty support, tenure, and even curriculum development. It may greatly affect institutional autonomy in addition to limiting faculty academic freedom and speech.

Noted threats to Diversity

The document says that accrediting agencies must require institutions to implement policies that support and promote intellectual diversity and the free exchange of ideas among faculty. This includes things like measuring student and faculty “perceptions” of expression of personal views. These policies represent a fundamental shift in how accrediting agencies evaluate universities. Under these new rules, the federal accreditation directly affects how universities deal with reports of faculty speech or views, faculty hiring, and academic freedom.

University audits are planned to attempt to measure “perception”. Institutions must develop ways to measure student and faculty perceptions regarding the range of academic perspectives present on campus (things like surveys or interviews). Accreditors then would need to inspect these measures to determine whether a university is complying with the ‘viewpoint diversity’. I think the idea is they want to see if polarizing views on one side of the aisle are dominating and whether the opposite polarizing views are not allowed.

The proposal states that DEI standards or guidelines will be prohibited. Accreditors are forbidden from maintaining standards that mandate, encourage, or permit institutional preference based on protected characteristics like race, ethnicity, or sex in faculty hiring, tenure, or student admissions. Proposed 602.17g explicitly prohibits accrediting agencies from having standards that "encourage, direct, or otherwise require institutions or programs to violate Federal or State law, including by having policies that provide any preferences on the basis of race". The Executive Order on which the document is based makes accreditors require improved program planning “without reference to race, ethnicity, or sex”. Interestingly, universities with an explicit religious mission are exempt from the mandatory intellectual diversity requirements, preserving their right to follow their faith-based doctrines.

Potential impact on UCR: UCR is a federally designated Hispanic-Serving Institution (HSI) and an Asian American and Native American Pacific Islander Serving Institution (AANAPISI) with a very diverse undergraduate population. These restrictions threaten UCR’s ability to assist disadvantaged students, which will likely reduce equity, and could impact student retention, mentorship, and support programs designed to close achievement gaps that may be related to diversity.

Noted threats to UCR operations and finances

The proposal severely tightens "separate and independent" rules which would reduce shared resources (602.14, 602.15). Accreditors would no longer be allowed to share resources, IT, personnel, or office space with other associations.

UCR’s professional programs (for example Bourns College of Engineering, School of Business, and Public Policy) rely on specialized accreditors. If these accreditors experience disruption because of the new regulations, increased costs, or loss of reputation/recognition, it could slow down accreditation timelines, increase compliance costs that would likely be passed on to UCR, or disrupt professional licensure tracks for graduates.

The rules make it easier for institutions to switch accreditors or hold multiple accreditors, eliminating geographic boundaries and removing the "two-year rule" for new agencies.

Noted threats to Undergraduate Students, especially Transfer Students

There is language in the document that requires accreditors to evaluate programs using strict metrics, such as post-grad earnings data and standardized test scores relative to the total cost of attendance. Evaluating educational value using things such as immediate economic returns can be problematic for liberal arts, humanities, social sciences, and public service majors. Undergraduates pursuing paths with high societal value but lower immediate post-grad pay (for example degrees in education or humanities) could see program funding or institutional support cut.

Transfer Students may be particularly impacted by this proposal. UC undergraduates frequently transfer credits from California Community Colleges (CCC) or other four-year colleges. Making standards less rigorous and encouraging "competition" among accreditors could lead to lower-ranked institutions becoming elevated in terms of federal recognition and funding. Undergraduates transferring into UCR may get here with credits from lower-tier accredited institutions that don't really prepare them for the challenging coursework at UCR. While the general idea is to make it easier to transfer credits between schools, it presents some clear risks for transfer students at UCR. Under the proposed 602.24e, accrediting agencies must require institutions to accept comparable transfer credits from any federally recognized accredited institution and prohibit denying credits based on the reputation or status of the school or its accreditor. UCR which gets most transfers via the CCC system hold tough UC-system academic standards. If we are forced to accept coursework from non-traditional or new accreditors the students could arrive here unprepared for how UC courses are taught. This could cause inequities, particularly in STEM fields.

Also, these rules may cause some delays in the overall transfer process. The document says that if an institution denies a transfer credit request, it must provide the student with a written justification detailing the rationale and offer a formal appeal process within 15 calendar days. Given UCR's high volume of transfer applicants, processing individual written justifications and managing super short appeal timelines could be a major problem for academic advising and admissions. This justification rule could lead to late degree audits, financial aid disbursements, and course registration for incoming transfer students.

Some of these changes could also lengthen time to degree for transfers. If students transfer lower-division courses under expanded credit-acceptance rules that do not align with UCR's upper-division major preparation, they risk taking advanced coursework without adequate foundational knowledge. This gap could possibly lead to higher course repetition rates, ultimately increasing the time and cost required to earn a degree.

Additionally, the proposed rules make it easier for schools like CCCs to switch accreditors or use multiple accreditors. If a transfer student's previous school frequently changes its accrediting status or switches to a new accreditor, evaluating transcripts to give credit for classes at UCR will become more complex and unpredictable.

September 1, 2026

To: Kenneth Barish, Chair
Riverside Division of the Academic Senate

From: Jerayr Haleblian
Chair, School of Business Executive Committee

Re: (Consultation): ***Proposed Accreditation Regulations***

The EC School of Business notes that the UC Riverside Faculty Operations Manual defines academic freedom by emphasizing instructor autonomy and scholarly judgment within their field of competence. In direct contrast, the proposed DOE regulations mandate that institutions measure and prioritize "intellectual diversity," a requirement that UCR administration notes would impinge upon academic freedom by forcing faculty to balance ideological viewpoints rather than relying on rigorous academic standards.



September 2, 2026

TO: Ken Barish, Chair
Riverside Division of the Academic Senate

FROM: Rachel Wu, Chair 
CHASS Executive Committee

RE: Proposed Accreditation Regulations

The CHASS Faculty Executive Committee reviewed the Proposed Accreditation Regulations. The Committee finds this rule change deeply concerning due to the reasons detailed below.

- Accreditation reviews involving justifying expenditures, and other costs (i.e., the return-on-investment standard proposed) will systematically disadvantage the humanities, arts, some social sciences, and even some STEM fields, as "low value" programs.
 - Proposed §602.16(a)(1)(iii) requires accreditors to assess "educational and economic returns" for every program, and proposed §602.17(a)(2)(E) says they should use earnings data "relative to the total cost of attendance" (91 Fed. Reg. at 53956–57 (preamble); id. at 54008 (proposed text)). This is paired with a mandatory institutional "cost/benefit analysis" of staffing, facilities, and program design, §602.17(a)(3)(i) (id. at 54008). The rule is intended to "shift institutions' and programs' focus towards cost-effective practices for staffing, facilities, student services, and program design." Georgetown's Center on Education and the Workforce published earnings data in October 2025. While STEM majors have higher median earnings than arts/humanities majors overall (\$98,000 vs. \$69,000 mid-career), the picture is more complicated than the ROI standard assumes: 14 of 19 individual humanities and arts majors have median earnings above the 25th percentile of all STEM earners, and economics majors (classified as liberal arts) out-earn most engineering specializations at mid-career. In addition, this requirement reduces education to vocational training—or worse, orientation towards income, rather than a “vocation.”

- In addition: The "staffing flexibility" provision compounds the problematic "return on investment" language by weakening protections that allow low-enrollment fields to survive what might turn out to be short-term lulls in demand.
 - Proposed §602.17(a)(1)(iv) requires accreditors to confirm that institutions maintain "sufficient flexibility in instructional staffing policies and procedures to respond to persistent, material changes in student demand, program viability, or financial conditions." This standard, with §602.16(a)(1)(iii) on "ROI," disadvantages fields whose methodology involves the critical study of economic, political, and social systems. A program already disadvantaged by an earnings-based metric may find itself restructured out of existence when enrollment declines--without the procedural protections of the past, such as the requirement of financial exigency or shared governance review.
- The intellectual-diversity and viewpoint provisions work as individual-level political assessment, not system-level assessment, which exceeds the Department's statutory authority.
 - Proposed § 602.17(a)(1)(viii) requires institutions to adopt policies that measure student and faculty "perceptions on the range of viewpoints offered" (91 Fed. Reg. at 54008). Diversity of viewpoint, unlike diversity of institutional processes (hiring transparency, non-retaliation protections, grievance procedures), cannot be measured except through individual polls assessing political and intellectual views. This aggregates individual political and intellectual beliefs into a compliance metric rather than auditing institutional structures. As AAUP President Todd Wolfson warned, "The stated goal of increasing 'intellectual diversity' is code for a partisan agenda that will muzzle faculty who do not espouse Trump's ideological agenda." Furthermore, using accreditors to mandate viewpoint polling exceeds the Secretary's authority under 20 U.S.C. § 1099b(o), which explicitly prohibits federal standards from dictating institutional curriculum and faculty policies.
 - Accreditation reviews could impinge more on academic freedom and intellectual diversity, and tie in more closely with IRB/research integrity. Accreditors should only assess systems, not individual faculty/curriculum. Specifically for curriculum and other academic degree related decisions, these should be based on faculty/shared governance decisions.
- Easier accreditor entry and consequent "accreditor shopping" will introduce significant issues.
 - Proposed rules eliminating the two-year operating requirement for new accreditors, removing geographic scope restrictions, and making traditional peer review optional (§602.3), create the conditions for "accreditor shopping." The AAUP warns that lowering barriers to entry will force existing accreditors to "either transform themselves beyond recognition... or be replaced by new fly-by-night agencies willing to toe the party line." When institutions facing unfavorable

reviews can switch to permissive or ideologically aligned accreditors, the uniform rigor of accreditation is destroyed, degrading its core function of ensuring educational quality. In essence, making it easier to create new accreditors in a "free market" can introduce issues related to accreditations becoming meaningless.

- This amendment is particularly concerning as it sounds like the accreditation standards can differ across agencies, making them less "standard" across institutions. *"Amend § 602.16 to codify that an agency may establish additional lawful accreditation standards that are consistent with ensuring institutional or programmatic quality and integrity as it deems appropriate."*
- They also acknowledge that this will involve costly adaptations to ever-changing standards: *"The proposed regulation also encourages accrediting agencies to include new criteria that evaluates program and institutional outcomes. This may impose new costs on accreditors, who may need to develop such criteria, and on institutions, who may need to implement changes to meet such criteria."*
- The proposed regulations discuss First Amendment rights, program content, etc., which is accreditation overreach.
 - Faculty should reserve the rights for dealing with transfer credits and determining equivalency.
 - This proposed regulation (page 19) is all about First Amendment rights, which feels like accreditation overreach (i.e., a specific conservative agenda unrelated to education): *"Amend § 602.17 to clarify expectations for reviewing student achievement and faculty related policies, including academic freedom and intellectual diversity. There are also new requirements for cost-benefit analysis, institutional flexibility and mission, program length review, and safeguards against misrepresentation."*
 - We are also concerned by their justifications that detail further overreach in program content: *"Proposed changes to § 602.17(b) would eliminate the requirement that an institution or program engage only in a 'self-study' and allow agencies to implement innovative and comprehensive approaches to evaluating the quality of an institution or program."*

Finally, we note that a 30-day public review period for an 82-page document of such importance is unreasonable, and a 2-day review period for our committee is even more unreasonable, especially over the summer.



September 4, 2026

TO: Kenneth N. Barish, Chair, Academic Senate, UCR Division

FROM: Quinn McFrederick, Chair, Faculty Executive Committee, College of Natural and Agricultural Sciences

SUBJECT: [Systemwide Review] Proposed Regulations: Proposed Accreditation Regulations

Dear Senate Chair Barish,

The CNAS Faculty Executive Committee received the request for feedback on the notice of proposed changes to the rulemaking of the accreditation system (AIM) last night (September 3, 2026). While we have not had time to discuss and come to a consensus, this proposal is important enough that I would like to highlight the sections that I find the most troubling. A few of these sections overlap with the Accreditation Liaison's draft response, but there are two points that I would like to add. Due to the accelerated timeline, this memo represents my views and not necessarily the whole committee's views, as CNAS FEC did not have time to review the document and discuss properly.

The two topics that jump out as the most troubling to me and that are not on the Accreditation Liaison's draft are:

- 1) Instructional staffing flexibility (602.17(a)(2)(iv)). "Sufficient flexibility in instructional staffing policies and procedures to respond to persistent material changes in student demand, program viability, or financial conditions;" This appears to threaten the tenure system. For example, schools with strong tenure systems could be deemed "not flexible enough" in that they cannot lay off faculty when enrollments drop.
- 2) Removing requirement of peer-review from accreditation. (602.3) "The Department proposes to make use of peer review optional, not mandatory." Removing the requirement of peer-review in the accreditation process is dangerous in that opens the accreditation process up to outside pressures. Accrediting agencies could appoint staff that impose their specific agendas on the accreditation process instead of requiring accreditors to be faculty.

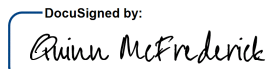
I want to also reinforce the following two points in the Accreditation Liaison's draft response:

3) 602.17: Intellectual diversity. Beyond the problems involved with hiring based on political viewpoints, this will lead to pressure to hire faculty with views that have been discredited by the candidate's respective field. For example, intelligent design is not a scientific discipline, but biology departments could be required to hire faculty that ascribe to intelligent design to increase intellectual diversity and receive accreditation.

4) 602.16: Program assessment tied to student achievement. While student success is paramount, assessments using, for example, completion rates and graduate earnings are not appropriate. Assessments based on completion rates could lead to further grade inflation by putting pressure on Professor's to pass students that have not mastered the material. Different fields have different incentive structures, and financial gain can be high or low on those lists.

I urge the senate and our administration to use all available means to push back on this proposal. Metrics of academic success will vary substantially by program and institution, and without review by faculty experts from multiple fields, the accreditation process will become another mechanism by which outside influences control academic institutions. Thank you for the opportunity to comment.

Sincerely,

DocuSigned by:


9/4/2026 | 11:37 AM PDT

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Quinn McFrederick, Ph.D

Chair, Faculty Executive Committee, College of Natural and Agricultural Sciences

09/03/2026

To: Kenneth Barish, Chair of the Assembly of the Academic Senate
and Cherysa Cortez, Executive Director of the UCR Academic Senate

From: Kinnari Atit, Ph.D., Faculty Chair of the School of Education Executive Committee

Subject: Feedback on Proposed Accreditation Regulations

The SOE Executive Committee reviewed the Proposed Accreditation Regulations. Comments/feedback were solicited via email. There are three areas of concern we would like to share.

Transfer Credit Outcomes

We agree that there is a need for greater transparency around how institutions make decisions about accepting/denying transfer credits. An unintended consequence of requiring written notice for denial of transfer credit is that it creates an administrative burden for programs (and institutions) that accept a greater number of transfer students. This is true for the SOE (¼ of fall 2025 incoming undergraduate students were transfers).

Student Outcomes and Economic Returns

We support the use of student outcomes as one way to evaluate program quality, particularly outcomes that are directly connected to the goals of a program, such as completion rates and professional licensure outcomes. However, we have several concerns about placing greater weight on these measures in accreditation decisions.

First, research on performance-based funding in higher education suggests that placing greater emphasis on outcomes such as graduation and retention can create unintended incentives for institutions to admit students who are already more likely to graduate in order to improve their performance on these measures. This can have consequences for access and enrollment for students from historically underserved groups (e.g., Ra et al., 2023). Placing greater emphasis on student outcomes without also considering the resources institutions need to support those outcomes could therefore work against the School of Education's mission of serving a diverse student population, including students of color, low-income students, and first-generation college students.

We are also concerned about the proposal that program-level student outcomes be considered "without reference to race, ethnicity, or sex." Looking only at overall outcomes can hide important differences in students' experiences and success. Disaggregating student outcome data is an important tool for identifying persistent inequities and determining where additional support or changes may be needed. Preventing or limiting consideration of these differences in accreditation conversations could make it more difficult for institutions and accreditors to identify and address inequities in student outcomes.

Finally, we have concerns about using graduates' earnings as a measure of program quality. This is particularly problematic in education and other public-service fields, where salaries are often determined by state and local salary schedules and labor markets rather than the quality of the program students completed. A strong teacher preparation or educational leadership program should not be viewed as providing less value simply because its graduates enter important professions that are not highly paid. We are also concerned that this approach could unintentionally discourage universities from investing in programs that prepare students for essential public-service careers.

We recommend allowing measures of student success to reflect the goals, student populations, and context of individual programs rather than relying heavily on a narrow set of outcome measures.

Academic Freedom and Intellectual Diversity

We support the proposed protections for academic freedom and the principle that accreditation decisions should not be based on viewpoints that are unrelated to legitimate academic standards. At the same time, we have concerns about language requiring institutions to support and prioritize "intellectual diversity among faculty." Depending on how this is interpreted, it could interfere with faculty decisions about curriculum, hiring, disciplinary expertise, and the development and evaluation of scholarly work. Faculty should retain the ability to determine the content of their courses, pursue lines of inquiry, and evaluate scholarship according to the standards of their disciplines. We recommend clarifying this language so that protecting intellectual diversity does not result in accreditors prescribing course content, research priorities, or the viewpoints that must be represented among faculty.

Professional Associations and Programmatic Accreditation

We understand the goal of ensuring that accrediting agencies operate independently and avoid conflicts of interest. However, we are concerned that some of the proposed restrictions could make it more difficult for accreditors to seek input from professional associations and others with expertise in a field. In education and other professional fields, accreditation standards need to stay connected to current research, professional practice, licensure requirements, and the needs of the communities graduates will serve. Accrediting agencies should be able to remain independent in their decision-making while still seeking meaningful input from professional organizations, practitioners, researchers, and other experts in the field. We recommend that the regulations make this distinction clear.

Thank you for the opportunity to provide feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Kinnari Atit", followed by a stylized flourish or checkmark.

Kinnari Atit

Chair, Faculty Executive Committee
Associate Professor
School of Education
University of California, Riverside
Email: kinnari.atit@ucr.edu



September 4, 2026

TO: Ken Barish, PhD, Chair, Academic Senate, UCR Division

FROM: Adam Godzik, Ph.D., Chair, Faculty Executive Committee, UCR School of Medicine

SUBJECT: **[Systemwide Review] Proposed Regulations: *Proposed Accreditation Regulations***

Dear Ken,

The SOM Faculty Executive Committee has review the proposed regulations and have the following concerns:

It essentially describes a system where accreditation would not be a peer-review quality control, but would evolve is some hybrid system where market forces and government oversight would play an increasing role. The main point:

- Professional societies, such as AAMC and AMA would be completely separated from the accreditation process;
- Medical education quality may be now defined by multiple bodies, including people and organizations not involved in medicine
- Accreditors would be competing based on the price and would not be required to include experts in the field, just loosely defined “competent and knowledgeable” people
- Accreditors would be required to consider program outcomes and economic return in their considerations
- Accreditors would assess whether the institution protects “academic freedom”. “Free speech” and “intellectual diversity” without defining it. As we know these concepts have been interpreted very strangely these days.

Yours sincerely,

DocuSigned by:
 9/4/2026 | 2:54 PM PDT
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Adam Godzik, Ph.D.
Chair, Faculty Executive Committee School of Medicine