



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.