College of Humanities, Arts, and
Social Sciences
EXECUTIVE COMMITTEE

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.