



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.

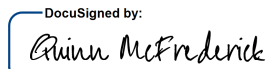
I want to also reinforce the following two points in the Accreditation Liaison's draft response:

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,

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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