

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

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