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Elizabeth Daggett
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202.

Comments on Updates to the Accreditation Handbook

Dear Ms. Daggett,

Thank you for soliciting information about the Accreditation Handbook and intellectual diversity.

Executive Summary

As implemented by guidance in the Accreditation Handbook, accreditation standards emphasize institutional capacity, procedural compliance, and proxy outcome measures (e.g., retention and graduation rates) rather than direct evidence of educational quality and subject-matter mastery. This comment illustrates how standards implemented by accreditors such as WSCUC can unintentionally incentivize lowered academic rigor, grade inflation, unprofessional norms among students, and policies that substitute social promotion for subject mastery. A more aligned Handbook would create incentives for tutoring and scaffolding students instead of expanding mechanisms of avoidance.

How the Handbook has been interpreted also risks undermining intellectual diversity by embedding contested political values into institutional self-statements and evaluation criteria, while failing to assess whether students have opportunities to explore competing ideas or are exposed to reasoned disagreement. Accreditation reform should prioritize limited but meaningful performance-based metrics, viewpoint-neutral standards for intellectual pluralism, and proportional oversight that distinguishes high-performing flagship institutions from those presenting genuine quality risks.

This comment is submitted in my individual capacity.

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To motivate concepts for improvements to the Handbook, I provide examples of how the Handbook's policy shapes UC Berkeley's accrediting commission, WASC Senior College & University Commission (WSCUC). Although the RFI concerns the Handbook, this comment at times discusses the underlying doctrine of accreditation.

WSCUC's rubric is largely designed to test institutional capacity, procedural regularity, and documentary compliance, rather than directly evaluating whether students are mastering demanding academic material. Many Criteria for Review (CFRs) rely on proxy evidence, policies, plans, rates, and processes, rather than direct demonstrations of learning. This approach is a product of the regulation and the Handbook, which favors accounting-style counting rather than expert evaluation.

The Handbook is implemented such that standards tend to emphasize procedural sufficiency over substantive judgments about educational quality. Instead of requiring the commission to engage in qualitative evaluation of academic rigor, the standards often substitute checklists of procedures. In some cases, accreditation evidence consists primarily of the institution attesting that it maintains a website or policy addressing a given topic. See https://ue.berkeley.edu/sites/default/files/wasc_required_data_exhibits.pdf

To illustrate this, consider the UC Berkeley self-study. It is a highly legible accreditation document, but it is not an examination of educational excellence. Following the lead of the accrediting commission, it devotes sustained, concrete attention to identity, belonging, and support infrastructures. Identity-focused material is extensive, detailed, operationalized, and metric-rich, occupying an entire major section and substantially shaping the framing of "student success" throughout the report.

On the other hand, teaching and research quality are treated as largely self-evident outcomes of reputation, funding, and participation. Again, this is a consequence of accreditation's focal emphases.

Promoting Educational Quality

Easily measurable metrics may undermine academic quality. For instance, WSCUC's key indicators include factors such as first-year retention and graduation rates. While these appear to be metrics of quality, they may incentivize institutions to engage in practices that prioritize persistence over demonstrated mastery. Few of WSCUC's key indicators are related to subject mastery (one example that does assess mastery is law bar passage rates).

The UC System has set a goal of 90% graduation. This appears to be a reaction to university rankings and accreditation bodies. It is a problematic goal, given that it is easier to comply with it by lowering standards than by investing in instruction. The goal also seems untethered from the realism that education takes effort from both the institution and the student. The goal suggests that we should graduate 90% of students, even if more than 10% have in essence given up their side of the bargain.

Imagine a Handbook that promoted limited comparison of common external assessments, such as GRE or GMAT scores, or other discipline-appropriate benchmarks. Additional examples of more substantively meaningful metrics include:

- Surveys of faculty asking them to assess the academic preparedness of the student body
- Surveys of faculty asking whether they are lowering standards, or feel institutional pressure to do so

- Surveys of faculty asking them to attest to average student attendance rates they observe in class
- Reporting of a true student-to-faculty ratio (i.e., one that does not count part-time and contingent lecturers). For example, our recent report claimed a 19:1 ratio, but this figure includes contingent faculty; the true ratio is approximately 28:1
- Reporting of student contact time with tenured and tenure-track faculty
- Reporting of success rates on professional licensure examinations (architecture, optometry, law, etc.)

The upside of these metrics is that they would be much easier to collect and report. At Berkeley, with a colleague, we have already collected extensive survey data through a project called the Bearometer: https:bearometer.berkeley.edu/. It took just days to administer a survey about student preparedness, a different survey probed undergraduate attendance rates. The Bearometer authenticates participants' status as a professor, but is otherwise anonymous.

Equity Metrics May Undermine Quality

Educational leaders have broadly embraced a "success of all students" standard as replacement language for DEI. Sometimes this is expressed as "equitable success of all students," suggesting that outcomes be equalized. These goals are not well thought through and I offer examples below of how they undermine excellence.

While the goal of expanding opportunity and reducing unjust barriers is uncontroversial, in practice this policy can imply that student failure is solely an institutional issue, erasing the role of student effort, preparation, and responsibility. Requiring equitable outcomes almost always results in lowered academic standards. The concept of "success of all students" appears to have been set in motion by Berkeley's 2013 accreditation by WASC. There is no evidence that the standard emerged from the faculty senate.

Formally, our hiring practices now discourage selection based on factors such as "excellence in teaching" and instead promote concepts such as "efforts to ensure the success and participation of all students." This is conceptually muddled but also producing several activities not well matched for the employers of the future. Promoting a "success of all students" approach has resulted in several maladaptive, standard-lowering policies:

First is "equitable grading," which encourages faculty to move away from evaluative assessment toward grading for completion. https://teaching.berkeley.edu/teaching-strategies/assessing-learning/equitable-grading-strategies

For example, a course may allow a student to take the same test multiple times until passing. While well-intentioned, this approach risks substituting completion for subject-matter competence. While advocates claim equitable grading does not lower standards, the evidence is thin, and their claims reflect an underlying assumption that critical evaluation and ranking of students is somehow misguided or even perverse. They do not address the problem that employers and others are interested in identifying performant students and that grade compression and social promotion makes it more difficult to find the best employees.

Second is an expanding demand for faculty to create exceptions for students challenged by regular social expectations. For example, administrators have expressed concern that some students feel intimidated by the prospect of asking a professor directly for an extension. Rather than coaching students to develop the resilience and skills required to engage

a person, such as attending office hours or finding better ways to manage their workload, administrators have asked faculty to create online forms to make deadline extensions easier to request. https://teaching.berkeley.edu/teaching-strategies/teaching-your-course/managing-deadline-extensions

A third problem comes in the administration's encouragement for students to request accommodations. Administrators now regularly suggest students obtain "academic flexibility" directly from their instructor—one recent message to students suggested doing so in response to an upsetting world event. Again, this de-professionalizes students and prepares them to be poor performers in the workplace.

"Success of all students" could be understood as the active cultivation of student professionalism and the internalization of responsibility. An educational approach might allow occasional missed deadlines early in a college career, while gradually tightening these release valves over time in order to build independence and resilience. In practice, however, faculty are often urged to adopt ever-greater flexibility in response to poor performance, including missed deadlines and incomplete work. It is difficult to imagine a professional workplace that would tolerate similar patterns of avoidance. To the extent that accreditation standards reward such flexibility as evidence of "success," they risk encouraging unprofessional norms, open-ended excuse-making and externalization of responsibility, rather than the development of professional judgment. In effect, these standards tend to model labor-management accommodation norms rather than professional norms, preparing students less for independent responsibility than for being "managed out."

Notably, there has been little institutional leadership focused on foundational student behaviors associated with academic success, such as regular class attendance and use of office hours. Instead, inclusion concerns have contributed to automatic course recording policies that appear to reduce in-person attendance and participation in courses where interaction is pedagogically central.

There may be metrics that diverge from excuse-making and that promote resilience and mastery among students. For example:

- Institutions could track a small set of first-year "gateway" or "weeder" courses (often only 8–10 courses) for:
  - Complexity: length and depth of assignments; cognitive level required (e.g., Bloom's taxonomy)
  - Grading distributions: evidence of grade compression or inflation over time
- Evidence that institutions are setting expectations for high achievement and providing scaffolding support for achievement (instead of avoidance). For instance, the ratio of resources provided for tutoring versus the constellation of options promoted for avoidance

Again, these metrics are much easier to collect than existing accounting.

Accreditation and Intellectual Diversity

Accreditation itself may be contributing to problems with intellectual diversity by emphasizing institutional values in ways that are coded with particular political commitments. Berkeley's accreditation self-study does this across multiple pages, emphasizing concepts such as social good, public good, and commitments to "social justice."

The difficulty is that the University of California's mission is defined differently. Our public service mission is explicitly "shaped and bounded by the central pervasive mission of discovering and advancing knowledge," not by advocacy. This distinction—knowledge-based inquiry—is not reflected in accreditation materials, which may give the impression that accreditors themselves expect political alignment rather than intellectual inquiry.[1]

Accreditation may thus function as a stalking horse for administrators' political preferences through "policy laundering." Administrators may attribute contested policies to accreditor expectations, but these may be in fact administrators' commitments reflected back through the lens of accreditation. One example to consider is DEI. Until recent developments, WSCUC imposed DEI requirements, including in areas that may have promoted legally questionable practices in hiring and admissions. As a result, the DEI portion of Berkeley's self-study for accreditation is the most substantial, most detailed portion of the report. Perhaps 35% of the report focuses on identity-based narrative content.

Accreditation introduces politically contested language without acknowledging trade offs. For example, CFR 1.5 imposes an "equity" standard rather than a neutrality- or equality-based standard.

Possible corrective approaches include requiring or encouraging commissions to examine:

- Whether the school has an institutional neutrality policy
- Reporting of "heckler's veto" incidents
- Surveys of faculty and students assessing freedom of expression and self-censorship
- Surveys asking faculty whether they have avoided topics or altered syllabi to avoid controversy or student backlash

A notional CFR might read:

"The institution fosters intellectual pluralism and reasoned disagreement as essential conditions for educational excellence. Students and faculty are free to teach and learn. The institution demonstrates that academic inquiry is conducted in an environment where disagreement is addressed through evidence-based reasoning, critical analysis, and respectful engagement rather than suppression, conformity, or avoidance."

Accreditation Relief for State Flagships

Finally, the Accreditation Handbook appears designed to address a broad adverse-selection problem: identifying low-quality or fraudulent institutions. For long-established public flagships and elite private institutions, educational performance is already demonstrated through labor-market outcomes, graduate placement, research productivity, and sustained demand.

The Berkeleys of the world do not even need the kind of accreditation called for by the Handbook. Accreditation takes enormous staff effort and results in the hiring of non-

[1]Berkeley's mission is defined in APM-010, "The University of California is committed to upholding and preserving principles of academic freedom. These principles reflect the University's fundamental mission, which is to discover knowledge and to disseminate it to its students and to society at large. The principles of academic freedom protect freedom of inquiry and research, freedom of teaching, and freedom of expression and publication. These freedoms enable the University to advance knowledge and to transmit it effectively to its students and to the public. The University also seeks to foster in its students a mature independence of mind, and this purpose cannot be achieved unless students and faculty are free within the classroom to express the widest range of viewpoints in accord with the standards of scholarly inquiry and professional ethics."

teaching/research staff for data collection and organization.

For leading institutions, accreditation could reasonably shift toward lighter-touch periodic verification, reserving intensive compliance review for institutions presenting higher risk.

Sincerely,

Chris Jay Hoofnagle*
Affiliation for identification only