



AAUP-USC Comments on CPHE Draft Evidentiary Standards

February 2026

The AAUP chapters at the University of South Carolina (Columbia, Aiken, Beaufort, and Upstate) appreciate the opportunity to offer comments on the Evidentiary Standards proposed by the Commission on Public Higher Education (CPHE). We have grave concerns about the CPHE's commitment to protecting academic freedom for faculty and students and about its ability to function autonomously and transparently.

Academic freedom and viewpoint diversity (standards 12 and 13)

- The fundamental problem with the evidentiary standards on academic freedom is that CPHE's founding institutions violate them flagrantly. We cannot take seriously guarantees of academic freedom offered by universities that require Sociology faculty to teach a [state-mandated curriculum](#) from a [textbook from which nearly all mentions of racism have been removed](#) or a system that [censors Plato in philosophy classrooms](#).
- The AAUP statement *The Freedom to Teach* asserts:

The freedom to teach includes the right of the faculty to select the materials, determine the approach to the subject, make the assignments, and assess student academic performance in teaching activities for which faculty members are individually responsible, without having their decisions subject to the veto of a department chair, dean, or other administrative officer.

Compare the Texas A&M system policy 08-01 that undergirds its current regime of classroom censorship:

No system academic course will advocate race or gender ideology, or topics related to sexual orientation or gender identity, unless the course and the relevant course materials are approved in advance by the member CEO.

These statements are incompatible, and AAUP-USC rejects Texas-style censorship.

- The language of the standards, which focuses on “patterns” rather than “isolated instances” (p. 9 of the draft guidelines) and on the present rather than on “past lapses” (p. 13) encourages universities that wish to violate the norms of academic freedom to do so early in the accreditation cycle. Do member institutions wish to threaten [faculty with secretly recording their classes](#) or to [close programs without faculty input](#)? Timing will be key to allowing these universities to claim that these are mere “episodic data points” (9) of minimal significance to present operations.

- The CPHE prides itself on being “the first among institutional accreditors to document the importance of intellectual diversity,” (p. 4) and offers “its own” definition: “a cultural and pedagogical state that furthers pursuit of truth by welcoming a spectrum of reasonable ideas into consideration, civil debate, and study” (p. 35).
 - We note that this new definition departs significantly from that offered in e.g. Ohio and South Dakota state law, which refer exclusively to “[public policy issues](#)” and “[ideological and political perspectives](#).”
 - AAUP’s 2004 response to David Horowitz’s “Academic Bill of Rights,” which called for intellectual diversity, remains useful:

The danger of such guidelines is that they invite diversity to be measured by political standards that diverge from the academic criteria of the scholarly profession. Measured in this way, diversity can easily become contradictory to academic ends. . . . the appropriate diversity of a university faculty must ultimately be conceived as a question of academic judgment, to be determined by the quality and range of pluralism deemed reasonable by relevant disciplinary standards, as interpreted and applied by college and university faculty.

Advocates for the Academic Bill of Rights, however, make clear that they seek to enforce a kind of diversity that is instead determined by essentially political categories, like the number of Republicans or Democrats on a faculty, or the number of conservatives or liberals. . . . [T]he assessment of faculty by such explicitly political criteria, whether used by faculty, university administration, or the state, would profoundly corrupt the academic integrity of universities.

- The CPHE refers repeatedly to an “ideal state” of intellectual diversity that requires no institutional intervention (p. 35). AAUP-USC fears that few campuses will ever achieve this “ideal state,” which then becomes merely a justification for “affirmative favoritism” and a constant “need to wrestle with cultures or practices that have a prejudicial effect on the articulation of some ideas” (p. 35)
- Guidelines refer to “civil debate,” (p. 35) and “civil discourse,” (pp. 36, 37, 38 as well as “civic discourse,” possibly a typo, on p. 37) but include no acknowledgement that uncivil speech, too, deserves protection. Uncivil debate, common on campuses and virtually always protected by the First Amendment, is only one way in which the “ideal state” of intellectual diversity appears unachievable.

Curriculum (standards 14 and 15)

- Evidentiary guidance on curriculum does not specify that it should be controlled primarily by faculty. AAUP-USC fears that nothing in these guidelines would stop political imposition of curricular rules (see the Florida Sociology syllabus and the Texas A&M system policy cited above).

- The draft offers no guidance on general education curricula; it says only that curricula and program length must “demonstrate . . . alignment with mission, institution type, degree level, and / or credentialing requirement” (p. 38). Nothing prevents institutions from gutting general education and offering abbreviated degrees, as long as they “define and justify” their actions (p. 40). SACSCOC, in contrast, specifies credit-hour requirements for associate and bachelor’s degrees and requires a general education curriculum “to ensure breadth of knowledge” that does not “narrowly focus on those skills, techniques, and procedures specific to a particular occupation or profession.

Autonomy

- An accreditor must be independent to be credible, and AAUP-USC does not believe that the CPHE is or will be perceived as independent. The presence among the founding members of institutions that have egregiously violated student and faculty academic freedom suggests that the CPHE will be an indulgent, even compliant, accreditor. We do not believe, for instance, that the CPHE will censure its primary funder, the state university system of Florida, where, according to the Foundation for Individual Rights in Education, “a pall of orthodoxy” imposed by politicians “[undermine\[s\] the promise of academic freedom that is so integral to higher education](#).”
- Peer review works when the pool of reviewers is large. SACSCOC’s 750+ members generate a substantial pool. CPHE’s 6 members, in contrast, seem designed for back-scratching and exchanges of favors.
- The initial draft of CPHE principles asserted that “in the event that the Commission’s standards conflict with state law, . . . state law [will] take precedence.” This issue, which continues to concern AAUP-USC, has now been postponed to CPHE Policies and Procedures (p. 13). Allowing differing state laws to override CPHE principles will effectively render the principles meaningless as states effectively set their own principles and policies
- In the section on “Decision-making structures. . . Preventing Conflicts of Interest,” the guidelines refer to “layers of oversight” that will “manag[e] conflicts of interest and any appearances of conflict of interest” (p. 15). AAUP-USC wonders if these layers will be in place when the first cohort of institutions begins the accreditation process (which, according to cphe.org, actually began several months ago in fall 2025).

Clarity, efficiency, transparency

- AAUP-USC asks why is this the first public CPHE document to mention the existence of Faculty for Responsible Education and Accreditation (FREA) or the Standards and Procedures Working Group (p. 1)? Why are these bodies and their membership not described on the CPHE website? Why does FREA membership for the University of South Carolina include only senate leadership from the Columbia campus? How were members of the Working Group selected, and how would faculty find out who

participates in this process, since they're not mentioned on CPHE website? The problems with these bodies are violations and betrayals of the CPHE's supposed commitment to transparency.

- The CPHE's "Interpretive-contextual Epistemological Framework for Accreditation" is jargon-ridden, obscure, and incompatible with claims to clarity.
- Do CPHE Policies and Procedures already exist? This document refers to the process of drafting them in the past tense on page 5, elsewhere referred to as occurring in the future.
- AAUP-USC observes that in a state where the Office of the Treasurer recently lost track of [\\$1.8 billion](#), relying on state audits (p. 3) to guarantee the financial stability of a university will not necessarily enhance public confidence.

AAUP chapters in the USC system fear that joining the CPHE threatens the quality of education and research in South Carolina and places the university's reputation at risk. Given recent efforts by CPHE founding institutions, notably the state university system of Florida, the University of North Carolina system, and the Texas A&M system, to gut the core tenets of academic freedom, the CPHE's statement of principles rings hollow. The CPHE's claim to autonomy is weak; its limited membership and the prominence of institutions engaged in notorious violations of academic freedom suggest that its evaluation of universities applying for accreditation will not be rigorous. We encourage members of our administration and our Board of Trustees to look skeptically upon CPHE claims and to consider the full range of possibilities in their choice of accreditor.