



Office of the President

September 21, 2026

Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Docket: [ED-2025-OPE-1042](#)

Dear Under Secretary Kent:

We write in response to the U.S. Department of Education's ("the Department") proposed rule, Accreditation, Innovation, and Modernization: The Secretary's Recognition of Accrediting Agencies: Institutional Eligibility Under the Higher Education Act of 1965, as Amended, Student Assistance General Provisions. Our comments focus on the transfer credit process, student outcomes measures, and the inclusion of a definition of academic freedom. Southern New Hampshire University (SNHU) is a private, nonprofit, accredited institution with a 93-year history of educating traditional-aged students and working adults. SNHU has a unique structure, serving over 200,000 learners online and 3,700 learners on our campus in Manchester, New Hampshire.

First and foremost, we want to express our support for the proposed changes under § 668.43 to improve the transfer credit process between institutions. SNHU has long been committed to having a transparent transfer credit process that recognizes a learner's knowledge and experience, including accepting credit for prior learning.¹ Further, we support the proposal under § 602.24 to improve the closed school process by improving the oversight of teach-out agreements, including improving learner access to transcripts after a school closure.

We also appreciate the Department's emphasis on student success outcomes measures outlined under § 602.16 and § 602.17. As an institution that primarily serves the new traditional learner population, learners who are more likely to be

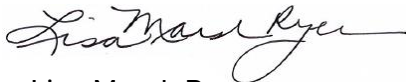
¹ https://www.chepp.org/wp-content/uploads/2024/05/CHEPP_Cost-of-Todays-College-Credit_WHITE-PAPER-003-FINAL.pdf (SNHU case study, page 12)

older, working, parents, and attending part-time, it is important to recognize that student success outcomes may vary from a traditional college setting. The Department should encourage accreditors to consider institution type and populations served when determining success metrics, such as using more years to measure degree completion. To help achieve this, institutions should be able to provide a set of their own metrics to be measured by in coordination with accreditors. Additionally, whenever possible, accreditors should be encouraged to align their student success outcomes measures with those already required, such as the new earnings premium accountability rule.

We do have concerns with the Department including a definition of academic freedom under § 602.17. While we recognize this definition is non-binding, we believe its inclusion is beyond the bounds of the Department's role. Any specific parameters of what comprises academic freedom and how it is measured should be left to accreditors, in collaboration with their member institutions. Specifically, we believe having a definition in any form could limit free speech and drive institutional content, contrary to the ethos of academic freedom.

Thank you for your consideration of our comments on these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Marsh Ryerson", with a stylized flourish at the end.

Lisa Marsh Ryerson
President