

August 5, 2026

Laura Sattler
Office of Student Involvement
Mount Holyoke College
5 Lower Lake Road
South Hadley, Massachusetts 01075

Sent via U.S. Mail and Electronic Mail (lesattler@mtholyoke.edu)

Dear Director Sattler:

FIRE, a nonpartisan nonprofit that defends free speech,¹ is concerned by reports that Mount Holyoke College requires all student organizations to complete diversity, equity, and inclusion training and develop anti-racist plans as criteria for recognition.² Shortly after FIRE learned of this mandate,³ the specific requirement language was removed from the RSO Annual Recognition page.⁴ However, MHC has not made clear whether these requirements have been formally rescinded.⁵ Therefore, we ask for clarification on any requirements that student organizations complete DEI training and/or develop anti-racist plans before being recognized

¹ For more than 25 years, FIRE has defended freedom of expression and other individual rights on America's university campuses. You can learn more about our mission and activities at fire.org.

² Brendan McDonald, *Mount Holyoke mandates DEI training, 'anti-racist plans' for official student group recognition*, CAMPUS REFORM (July 26, 2026, 4:51 PM), <https://www.campusreform.org/article/mount-holyoke-mandates-dei-training-anti-racist-plans-official-student-group-recognition/30309>.

³ *RSO Annual Recognition*, WAYBACK MACHINE CAPTURE, Feb. 14, 2026, <https://web.archive.org/web/20260214163907/https://embark.mtholyoke.edu/osi/annual-recognition-process/> (last visited July 31, 2026) ("We require that 2 officers from each student organization participate in the Diversity, Equity and Inclusion training hosted by The Office of Community and Belonging. The schedule and format are TBD. As an outcome of these training sessions, student groups will be creating anti-racist plans for their organization. Many groups have begun to create plans, but it is important for this work to be ongoing and for rising group leaders to have the opportunity to participate in training and bring ideas back to their group.").

⁴ *Compare RSO Annual Recognition*, MOUNT HOLYOKE COLL., <https://embark.mtholyoke.edu/osi/annual-recognition-process/> [<https://perma.cc/V2YZ-G5R6>] with *RSO Annual Recognition*, WAYBACK MACHINE CAPTURE, *supra* note 3.

⁵ MHC's anti-racism plan from 2020 states that "all student organization leaders are required to participate in training ... [regarding] oppression" and "will receive assistance in developing and implementing action plans ... to become ... anti-racist." *Mount Holyoke College's anti-racism action plan*, MOUNT HOLYOKE (Aug. 27, 2020), <https://www.mtholyoke.edu/news/news-stories/mount-holyoke-colleges-anti-racism-action-plan> [<https://perma.cc/AQR5-CD9T>].

by MHC, as such requirements must be eliminated to align with MHC’s own commitment to free expression.

MHC makes clear that it “believes in the right, indeed the necessity, of free inquiry and free expression for every member of the college community” and that it “aims to provide an environment hospitable to open interchanges of knowledge and opinion in the terms of reasoned discourse.”⁶ This commitment to free expression—and a reasonable student’s interpretation thereof—is informed by decades of First Amendment jurisprudence.

This means MHC cannot require student organizations to develop anti-racist plans as a condition of recognition. Decisions regarding the recognition of student organizations must be made using only content- and viewpoint-neutral criteria.⁷ As the Supreme Court has explained, if a college wishes to “disseminate an ideology, no matter how acceptable to some, such interest cannot outweigh an individual’s First Amendment right to avoid becoming the courier for such message.”⁸ The Supreme Court has repeatedly recognized viewpoint discrimination as “an egregious form” of censorship⁹ and that actors “must abstain from regulating speech when the specific motivating ideology or the opinion or perspective of the speaker is the rationale for the restriction.”¹⁰ Requiring student organizations to develop anti-racist plans forces them to embrace and promote particular perspectives on disputed political and ideological issues of race, impinging their freedom to dissent from prevailing consensus on issues of public concern.

Nor may students be forced to choose between their right to be free from compelled speech and gaining the benefits that accompany official organization recognition.¹¹ Conditioning recognition on the adoption of a prescribed message burdens students’ associational freedom by impairing their ability to organize around shared beliefs, advocate for causes, or simply join

⁶ *Statement of Free Inquiry and Free Expression*, MOUNT HOLYOKE COLL., <https://offices.mtholyoke.edu/risk/guiding-principles> [<https://perma.cc/M87Y-GDVM>]; *Student Handbook*, The Mount Holyoke Community, MOUNT HOLYOKE COLL., 4 (2025–26), <https://www.mtholyoke.edu/sites/default/files/2025-08/Student-Handbook-2025-2026.pdf> [<https://perma.cc/S4G9-4ABE>]. While MHC is a private institution, its invocation of “free inquiry and free expression” means that students will reasonably look to First Amendment jurisprudence to determine their expressive rights on campus.

⁷ See *Bd. of Regents of the Univ. of Wisc. Sys. v. Southworth*, 529 U.S. 217, 233 (2000) (“When a university requires its students to pay fees to support the extracurricular speech of other students, all in the interest of open discussion, it may not prefer some viewpoints to others.”); *Rosenberger v. Rectors of the Univ. of Va.*, 515 U.S. 819, 836 (1995) (“For the University, by regulation, to cast disapproval on particular viewpoints of its students risks the suppression of free speech and creative inquiry in one of the vital centers for the Nation’s intellectual life, its college and university campuses.”); *Widmar v. Vincent*, 454 U.S. 263, 277 (after a university “created a forum generally open to student groups,” the “content-based exclusion of religious speech ... violate[d] the fundamental principle that a state regulation of speech should be content-neutral”).

⁸ *Wooley v. Maryland*, 430 U.S. 705, 717 (1977); see also *Hurley v. Irish-Am. Gay, Lesbian & Bisexual Grp. of Bos.*, 515 U.S. 557, 573 (1995) (government “may not compel affirmance of belief with which the speaker disagrees”).

⁹ *Rosenberger*, 515 U.S. at 829.

¹⁰ *Id.*

¹¹ Recognized student organizations receive funding and the ability to hold events on campus. *RSO Annual Recognition*, *supra* note 4.

together to express ideas.¹² Denying recognition to a student organization because it declines to endorse a required ideological position deprives the organization of meaningful access to campus resources and opportunities, substantially impairing its ability to fulfill its mission and engage in protected expression. Compulsory speech not only violates an organization's expressive rights but also dilutes the prescribed message's meaning. As the Supreme Court explained in ruling that public schools cannot compel students to salute the flag, "To believe that patriotism will not flourish if patriotic ceremonies are voluntary and spontaneous instead of a compulsory routine is to make an unflattering estimate of the appeal of our institutions to free minds."¹³

DEI trainings bring up similar concerns insofar as they require student leaders to affirm agreement with any particular values, messages, or views. Trainings may only require students to acknowledge completion.

We appreciate that colleges have legitimate interests in promoting inclusive and enriching campus environments, including for students from backgrounds traditionally underrepresented in academia. But colleges should also be sure not to burden the expressive and associational rights of its students. To that end, we respectfully request a substantive response to this letter no later than the close of business on August 20, 2026, confirming that MHC has discontinued its requirement that student organizations complete DEI training and develop anti-racist plans before being recognized, in line with its commitment to free expression.

Sincerely,



Haley Gluhanich
Senior Program Counsel, Campus Rights Advocacy



Ally Duong
Legal Intern, Campus Rights Advocacy

Cc: Danielle R. Holley, President
Latrina L. Denson, Executive Director of Community and Belonging

¹² See, e.g., *Healy v. James*, 408 U.S. 169, 181 (1972) ("Among the rights protected by the First Amendment is the right of individuals to associate to further their personal beliefs.").

¹³ *W. Va. State Bd. of Educ. v. Barnette*, 319 U.S. 624, 641 (1943).