



October 15, 2026

Eric W. Kaler
Office of the President
Case Western Reserve University
10900 Euclid Avenue
Cleveland, Ohio 44106

Sent via U.S. Mail and Electronic Mail (president@case.edu)

Dear President Kaler:

FIRE, a nonpartisan nonprofit that defends free speech,¹ is alarmed by Case Western Reserve University's new requirement that all student organizations "align" their mission with the university's core values. CWRU's obligations under its own free expression policies cannot be squared with this requirement, which interferes with student organizations' ability to promote or advocate values according to their own consciences. We therefore urge CWRU to rescind the requirement and restore freedom of association and conscience to the members of these student groups.

Like many universities, CWRU is home to many student organizations. Its website boasts that "[o]ur 300+ student organizations are dedicated to just about any academic and recreational interest," and that "[s]tudent organizations let you pursue your interests, develop new passions and build networks."² These organizations run the gamut from College Republicans to College Democrats, to Case for Life, to #MeToo, reflecting the inevitable diversity of views and interests among CWRU's more than 12,000 students. And, as with any university of similar size, the beliefs and values of student groups may sometimes conflict on issues ranging from politics to religion, to the environment, and more.

This diversity of thought is protected by CWRU policies. The university expressly commits itself to "freedom of speech, thought, expression, and assembly, and guarantees all members of

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 *Activities and Organizations*, Campus Organizations, CASE W. RESERVE UNIV., <https://case.edu/admission/student-experience/activities-and-organizations> (last visited Oct. 15, 2026).

the CWRU community the fullest possible right to hold and express” their own views.³ Its Student Code of Conduct reiterates this commitment to protect freedom of expression by listing “free exchange of ideas” as part of the overall mission and as a core value of the university.⁴

However, on September 8, 2026, CWRU emailed all student organizations directing them to transfer their constitutions onto a new template created by the university.⁵ The new template, CWRU said, was designed “to help ensure that every organization reflects our commitment to an inclusive and welcoming campus.”⁶ As part of the change, CWRU implemented a requirement that “[t]he mission of the student group and the mission of third-party organizations (i.e. local, national, international) with which the student group chooses to affiliate must align with the university’s mission and four core values: academic excellence and impact, inclusiveness and diversity, integrity and transparency, and effective stewardship.”⁷

CWRU’s introduction of this viewpoint-based requirement simply cannot be reconciled with its existing commitments to freedom of expression, thought, and assembly. The right to “hold and express opinions” necessarily protects the right to hold and express one’s *own* opinions—not simply to parrot the opinions of campus authorities.⁸ By requiring that all organizations “align” with CWRU’s officially approved views on hotly contested social issues like “inclusiveness,” “diversity,” and “effective stewardship,” the university faces members of student groups with a stark choice: If they do not fully agree with the university’s views, they may either disband as a recognized group, or violate their conscience and falsely claim agreement or neutrality.

Such compelled speech is anathema to free expression, which protects not only the right to speak one’s mind, but the right to refrain from speaking.⁹ Coercing students to affirm the university’s views, “cast[s] a pall of orthodoxy”¹⁰ over the campus. Some students may not have even that option, if they wish to stay recognized, as the policy also threatens to disqualify student groups affiliated with national religious, political, or advocacy organizations simply because their missions differ from CWRU’s.

³ *Policy on Freedom of Expression/Expressive Activities*, Policy, Commitment to Freedom of Expression, CASE W. RESERVE UNIV. (Aug. 28, 2024), <https://case.edu/provost/policies/policy-freedom-expressionexpressive-activities> [<https://perma.cc/E6CW-HP7Z>].

⁴ *University Code of Conduct*, CASE W. RESERVE UNIV. (Aug. 21, 2026), <https://case.edu/studentlife/conduct/university-code-conduct> [<https://perma.cc/W7ZF-RTA6>].

⁵ Email from Marc Hartmann, Executive Director of Student Activities & Leadership, to Alexander M. Dantoulis, student (Sept. 8, 2026, 5:43 PM) (on file with author).

⁶ *Id.*

⁷ *Constitution Draft Template Form* (on file with author).

⁸ *Policy on Freedom of Expression*, *supra* note 3.

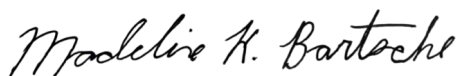
⁹ See *Wooley v. Maynard*, 430 U.S. 705, 714 (1977) (“[T]he right to freedom of thought protected by the First Amendment against state action includes both the right to speak freely and the right to refrain from speaking at all.”).

¹⁰ *Keyishian v. Bd. of Regents*, 385 U.S. 589, 603 (1967).

To illustrate our concern by analogy, we trust CWRU would readily recognize the problem with requiring students to salute the U.S. flag,¹¹ or compelling students to include statements promoting concepts like “patriotism” or denouncing ideologies such as communism in their organizations’ constitutions,¹² should CWRU determine that those are among its core values. Regardless of the values it chooses, requiring student organizations to affirm alignment with them and thereby making students personal couriers for CWRU’s views—even when doing so violates the dictates of their consciences—is unacceptable at an institution that promises free expression.¹³

We request a substantive response to this letter no later than the close of business on October 23, 2026, confirming CWRU has rescinded the requirement that student organizations and their third-party affiliates align their mission with the university’s core values.

Sincerely,



Madeline K. Bartsche
Program Counsel, Campus Rights Advocacy

Cc: Marc Hartmann, Director of Student Activities & Leadership
Katie Brancato, Senior Vice President, Chief of Staff and Strategic Advisor to the President
Jane Vondrak, Executive Assistant to the President

¹¹ The Supreme Court struck down a state’s power to compel such an act nearly 80 years ago, recognizing that “the compulsory flag salute and pledge requires affirmation of a belief and an attitude of mind.” *W. Va. State Bd. of Educ. v. Barnette*, 319 U.S. 624, 633 (1943).

¹² *Id.* at 642 (“If there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion or force citizens to confess by word or act their faith therein.”).

¹³ *See Wooley*, 430 U.S. at 714 (“[W]here the State’s interest is 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.”).