



November 22, 2019

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Dear Barbara:

Thank you for the opportunity to respond to Draft 1 of the 2020 NAAB Conditions and Procedures. We would like to reiterate that we appreciate the level of commitment and work taken on by NAAB in transforming its Conditions and Procedures for Accreditation. The process as a whole has been consultative and inclusive, and we continue to be supportive of NAAB's efforts to date.

This letter captures the official response of the ACSA to the drafts based on feedback captured from our members by email, at the Administrators Conference and other ACSA events, as well as deliberations within our own board of directors.

I. Credit Hours and Degrees

We do not endorse the language in 3.2 regarding degrees. We recommend that NAAB preserve the minimum credit hours for all professional degrees specified in the 2014 Conditions pending a broader discussion of degree requirements at all levels.

- 150 credit hours for the Bachelor of Architecture,
- 168 credit hours for the Master of Architecture, and
- 210 credit hours for Doctor of Architecture.

Suggested edits to this text are shown in Attachment 1 below. The reasons for our recommendation are as follows.

A. The language outlining requirements for the Master of Architecture degree is unnecessarily complicated and misleading to the public.

Essentially, the language suggests a 30-credit M.Arch degree with no undergraduate education in architecture is possible. It is not, and Draft 1 of the Conditions might set up an unrealistic expectation.

Section 3.2 states clearly, "All accredited programs must conform to minimum credit hour requirements established by the institution's regional accreditor." Our proposed edits remove redundant language

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citing the 30-credit-hour requirement and inform prospective students and parents that a combination of undergraduate credits in architecture courses can affect the total number required for the M.Arch degree.

B. Using regional accreditation to determine minimum credit hours for degrees will create more problems than it solves, risking erosion of the perceived quality of graduates of professional degree programs.

In short, we caution against changing the expectations for *quantity* of education without a shared understanding among the profession and discipline about how these changes will affect *quality*.

NAAB cites changes to general education requirements by regional accreditors as a primary reason for changing credit hour requirements. This rationale does not sufficiently value architecture's commitment to professional education. Establishing requirements for professional degrees based on whatever minimum standard of general education can be found will have unintended consequences on past graduates, current students, and future students.

1. The scope of content that professional degree programs in architecture cover is historically broad in order to address professional needs. The breadth of knowledge expected only continues to increase, with increasing research in firms, increased collaboration across disciplines, and increased range of project types. (2018 AIA Firm Survey) We are not confident that reducing general education requirements but keeping professional content the same will produce graduates with the appropriate depth and breadth of education. Courses in writing, public speaking, building performance, building construction, or other elective areas would likely exceed the minimum general studies requirements, but in a 150 credit curriculum could be covered.
2. Narrowing the undergraduate professional curriculum affects perceptions of the Master of Architecture degree. The profession does not have an explanation for the differences between the B.Arch and the M.Arch professional degrees. If NAAB moves to shrink requirements for the B.Arch, then the lack of distinction between the two becomes more pronounced and will lead to an erosion of public understanding and trust of architecture degrees.
3. Finally, ACSA acknowledges the need to reduce the cost of education, but does not believe that using regional accreditation to determine minimum credit hours for degrees is the answer. We believe it will have unintended consequences on students who arrive with remedial needs in writing, mathematics, and the arts. A shorter professional undergraduate degree that covers the same scope in fewer credit hours cannot serve students with these needs effectively. The added pressure of meeting "time to graduation" limits may increase the pressure to succeed in the years in which these students are most vulnerable to dropping out.

In sum, ACSA wants the path through architectural education to be efficient and more affordable for students. **We therefore invite NAAB to partner with ACSA in convening a discipline-wide conversation that aims to differentiate qualitative and quantitative expectations for achievement at all levels of architectural education.**

II. Other Recommendations for Changes to the NAAB Conditions

We have included several proposed edits to the Conditions text in Attachment 2 below. The edits illustrate ways to respond to feedback we have received from ACSA members about strengthening requirements for schools in three priority areas:

- urbanism and urban design
- architectural responses to climate change
- research in architectural education and practice

III. NAAB Procedures

A. Confidential Report. ACSA members have expressed concern over the switch from a Confidential Recommendation to a Confidential Report (section 3.7). The concern is that allowing the Visiting Team to file a separate report held confidential in perpetuity is not fair for programs under review. We understand the purpose of the report is to help NAAB to clarify a program's Plan to Correct. However, the team is allowed to provide "insight into the Unmet Conditions" where documentation was not sufficient. We believe program should have a chance to respond to such information. We appreciate that the NAAB seeks more information from teams about Unmet Conditions, but we recommend allowing programs access to this information, as well.

B. Collection of Student Work. ACSA members have been concerned about Procedures section 3.5 Evidence, specifically the requirement to collect 100% of student work within a year. The revisions in Draft 1 and the explanations shared in New Orleans make us more comfortable. We would like to suggest that the anonymized list of students given in advance to the team include information on student grades, so the team is better able to select a range of student work.

Again we sincerely appreciate the dialog and partnership that NAAB has extended, and we are happy to provide further information or engage in further discussion about our comments prior to the January NAAB directors meeting.

Sincerely,



Rashida Ng, President

Attachments

ATTACHMENT 1

ACSA proposed edits to 3.2 Professional Degrees and Curriculum

3.2 Professional Degrees and Curriculum

The NAAB accredits professional degree programs with the following titles: the Bachelor of Architecture (B. Arch.), the Master of Architecture (M. Arch.), and the Doctor of Architecture (D. Arch.). The curricular requirements for awarding these degrees must include professional studies, general studies, and optional studies.

- **Professional Studies.** Courses with architectural content required of all students in the NAAB accredited program and are the core of a professional degree program that leads to architectural licensure. Information from these courses are used to satisfy Condition 4--Program and Student Criteria. The degree program has the flexibility to require additional professional studies courses to address its mission or institutional context. In its documentation, the program must clearly indicate which professional courses are required for all students and which are electives.
- **General Studies.** An important component for the breadth of knowledge impacting architectural education. These courses are offered outside the academic unit that offers the NAAB-accredited degree and have no architectural content. Typically, the general studies requirement is satisfied by the general education program of an institution's baccalaureate degree or as an admission requirement to a graduate program.
- **Optional Studies (Curricular Flexibility).** All professional degree programs must provide sufficient flexibility in the curriculum to allow students to pursue their special interests either by taking additional courses offered in other academic units or departments, or by taking courses offered within the department offering the accredited program but outside the professional studies curriculum.

NAAB-accredited professional-degree programs have the exclusive right to use the B. Arch., M. Arch., and/or D. Arch. titles, which are recognized by the public as accredited degrees and therefore may not be used by non-accredited programs.

The number of credit hours for each degree is outlined below. Graduate degrees require a combination of undergraduate and graduate education, as addressed in 3.5 below. All accredited programs must conform to minimum credit hour requirements established by the institution's regional accreditor.

- **Bachelor of Architecture.** The B. Arch. degree **generally** consists of a minimum of 150 semester credit hours, or the quarter-hour equivalent, in academic course work in general studies, professional studies, and optional studies, all of which are delivered or accounted for (either by transfer or articulation) by the institution that will grant the degree. Programs must document the required and elective professional-studies classes (course #s,

titles and credits), the required number of credits for general studies and for optional studies, and the total number of credits for the degree.

- **Master of Architecture.** The M. Arch. degree consists of a minimum of 168 credits, or the quarter-hour equivalent, of combined undergraduate and graduate academic course work. The M. Arch. degree traditionally has had a minimum of 168 credits. Due to changes in general education requirements by the regional accreditors the degree could have fewer credits and takes one of the three forms listed below. Programs must document, for both undergraduate and graduate degrees, the required professional studies classes (course #s, titles and credits), the elective professional studies classes (course #s, titles and credits), and the required number of credits for general studies and for optional studies for both the undergraduate and graduate studies.
 - **Undergraduate degree and professional graduate degree earned at a single institution:** Formerly known as the 5-year M. Arch., the program is a combination of undergraduate and graduate education. Candidates for this degree have completed at least 120 semester credit hours, or the quarter-hour equivalent, at the undergraduate level and at least 30 credit hours at the graduate level per the institution's regional accreditor, all of which are delivered or accounted for (either by transfer or articulation) by the institution that will grant the degree. Combined undergraduate and graduate degree programs structured in this manner must include general studies, professional studies, and optional studies.
 - **Professional graduate degree following undergraduate pre-professional degree earned at the same or a separate institution:** Candidates for this degree have completed at least 120 semester credit hours, or the quarter-hour equivalent, at the undergraduate level and at least 30 credit hours at the graduate level, and hold a preprofessional B.A./B.S. degree in architecture or a related field before admission to the graduate-degree program. The undergraduate degree includes professional studies, general studies and optional studies; graduate-level academic course work must include professional studies and optional studies.
 - **Pre-professional architecture degree:** This term refers to architecturally focused four-year undergraduate degrees that are not accredited by the NAAB. These degrees have such titles as B.S. in Architecture, B.S. in Architectural Studies, B.A. in Architecture, Bachelor of Environmental Design, Bachelor of Architectural Studies, etc. The amount of architecturally defined content in these programs may vary from institution to institution and will determine the length of time required to complete the subsequent NAAB-

- accredited program. The undergraduate and graduate degrees do not need to be taken at the same institution.
- **Professional graduate degree following a non-architecture related undergraduate degree:** Candidates for this degree have completed at least 120 semester credit hours, or the quarter-hour equivalent, at the undergraduate level and at least 30 credit hours at the graduate level, and hold a B.A./B.S. degree from a regionally accredited institution or its equivalent from an international institution before admission to the graduate-degree program. The graduate-level academic course work must include professional studies and optional studies.
 - **Doctor of Architecture.** The D. Arch. degree consists of a minimum of 210 credits, or the quarter-hour equivalent, of combined undergraduate and graduate academic coursework. Accredited degree programs awarding the D. Arch. degree must require an undergraduate B.A./B.S. degree from a regionally accredited institution for admission or its equivalent from an international institution. Further, the
Programs must document, for both undergraduate and graduate degrees, the required professional studies classes (course #s, titles and credits), the elective professional studies classes (course #s, titles and credits), and the required number of credits for general studies and for optional studies, and the total number of credits for the degree.

ATTACHMENT 2

ACSA proposed edits to other sections of the Conditions.

2—Defining Values of the Profession

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Environmental Stewardship and Professional Responsibility: Architects have a responsibility for the impact of their work on the natural world. ~~Architects protect public health and wellbeing, which in turn affects the natural world.~~ As professionals and designers of the built environment, we embrace this responsibility and act ethically to accomplish it.

...

Leadership, Collaboration, and Community Engagement: Architects practice design as a collaborative, inclusive, creative, and empathetic enterprise with the communities ~~and clients~~ we serve and for whom we work.

4—Program & Student Accreditation Criteria

4.1 Program Criteria (PC)

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PC.5 Research and Innovation—How the program prepares students to engage and participate in architectural research to test and evaluate innovations in the field. ~~expands students' understanding of the field and encourages exploration, risk-taking, and inventiveness.~~

...

PC.7 Learning and Teaching Culture—How the program fosters a positive and respectful environment for learning and teaching that encourages optimism, respect, sharing, engagement, and innovation among the members of its faculty, student body, administration, staff, and the profession.

PC.8 Social Equity and Inclusion ~~Inclusive Environments~~—How the program deepens students' understanding of diverse cultural and social contexts and helps students translate that into built environments that equitably support and include people who have different backgrounds, resources, and abilities.

...

4.2 Student Criteria (SC): Student Learning Objectives and Outcomes

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SC.4 Technical Knowledge—How the program prepares students to understand the established and emerging systems, technologies, and

assemblies of building construction, and the methods and criteria architects use to assess those technologies against the design and performance objectives of projects.

...

SC.5 Design Synthesis—Ability to make design decisions within an architectural project while demonstrating broad synthesis ~~and~~ ~~consideration~~ of user requirements, regulatory requirements, site and urban context conditions, ~~ecological concerns,~~ and accessible design, and strategies to address climate change.

...

SC.7 Building Performance—Ability to make design decisions within an architectural project based on an analytical investigation of stated performance criteria to reduce negative human and environmental impact.

SC.8 Design in Urban Contexts—Ability to make design decisions within a urban-scaled architectural project while demonstrating broad responses to the larger urban setting, its spatial morphologies and the infrastructural, ecological, and social systems.

5—Resources

...

5.4 Human Resources and Human Resource Development

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- Demonstrate that it has an Architect Licensing Advisor who is actively performing the duties of the NCARB position description including attending the bi-annual Licensing Advisor Summit ~~or~~ ~~and~~ other training opportunities to remain knowledgeable of the requirements to obtain licensure, and ensures that students have resources to make informed decisions on their path to licensure.

...

- Describe the support services available to students in the program, including but not limited to mental well-being, academic and personal advising, career guidance, internship, and job placement.

5.5 Social Equity, Diversity, and Inclusion

The program must have a policy on diversity and inclusion that it communicates to current and prospective faculty, staff, and students, and that is reflected ~~reflects~~ in the distribution of the program's human, physical, and financial resources. The program must:

- Describe its plan for maintaining or increasing the diversity of its faculty and staff, ~~and students~~ since the last accreditation cycle, how it has implemented the plan, and what it intends to do during the next accreditation cycle. Also, compare the program's faculty and, ~~staff and student~~ demographics with that of the program's students and institution's.
- Describe its plan for maintaining or increasing the diversity of its students since the last accreditation cycle, how it has implemented the plan, and what it intends to do during the next accreditation cycle. Also, compare the program's student demographics with that of the institution and other benchmarks the program deems relevant.