September 8, 2008

Bruce E. Blackmer, FAIA
President
National Architectural Accrediting Board, Inc.
1735 New York Avenue NW
Washington, DC 20006

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Dear Bruce:

On behalf of the ACSA Board of Directors we are writing to provide comments on the NAAB Fusion Model for accreditation, which was published in August. Our comments are in two parts. First, as you will see with the attached brief, we sought feedback from our membership on various issues related to the model. On several issues we heard clear messages of support and concern. On other messages our membership was split or neutral. The brief we're providing includes a summary that highlights some key issues that we hope can be addressed going forward.

Regarding the Fusion Model itself, our membership was unable to make substantive comments because the Fusion Model presents more of a structure for the APR report than a set of specific criteria or measurements for evaluating programs. There was consistent concern about the lack of specifics. At the "First Crit" in June, much of the agreement among participants seemed to center on ideas related to sustainability, integrated practice, design, and leadership. There seems to be broad agreement about clustering Student Performance Criteria thematically, but the move towards a restructuring of the overall Conditions did not seem to represent a consensus.

Second, the ACSA Board wishes to underscore, alongside the feedback in the attached brief, three issues that we hope the NAAB will address as the ARC process continues.

1. **Requirements for Faculty Credentials.** ACSA does not support developing quotas or requirements for faculty credentials, such as registration. We firmly believe the issue of faculty credentials is a university-level issue that should not be subject to professional accreditation. The apparent reason for such a possible requirement is that registration implies a person should be able, or better qualified, to teach professional courses. To our knowledge there is no study or other documentation supporting this inference. ACSA strongly supports a close integration of the academic and professional worlds in our programs, and based on 2007 NAAB data, a strong majority of faculty are U.S.-registered architects. However, setting a quota or a requirement regarding faculty credentials will not, in our view, strengthen education.
2. **Mandatory Enrollment in IDP.** As shown in the survey results, 75% of our schools do not think it would be feasible to implement such a requirement. The reasons for this are multifold, as we have expressed previously, including the burden of tracking enrollment, the potential cost to students, and legal or other university-level policy issues related to the privacy and use of student records. We continue to support, as do AIA and AIAS, getting students exposed to IDP as early in the process as possible, including with required sessions or courses.
3. **Justification for Change.** The Fusion Model presents a significant restructuring of NAAB Conditions. So far, we are concerned that NAAB has not fully explained the reasons for such drastic changes. What shortcomings in accreditation are being addressed? How will this strengthen NAAB's ability to uphold minimum standards in architectural education?
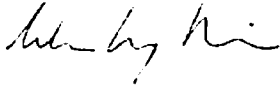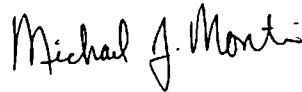
Finally, we hope the next version of the Fusion Model will present draft Student Performance Criteria and other details *about the points* of evaluation ACSA schools will face. Moreover. we hope that the larger architectural education community will begin to understand how several issues discussed in June and placed in a "parking lot" might begin to be resolved, including enrollment in IDP, faculty credentials, among other issues.

We thank you for the opportunity to comment on the Fusion Model and look forward to working with NAAB in the coming weeks.

Sincerely,

Marleen Kay Davis, FAIA
President

Michael Monti
Executive Director

Enclosure
cc: ACSA Board of Directors; presidents and executive directors/EVP of AIA. NCARB, AIAS

Executive Summary
ACSA SURVEY REGARDING FUSION MODEL AND ACCREDITATION ISSUES
September 8, 2008

At the mid-point of a two-year process for reassessing its Conditions for Accreditation, NAAB released for comment a "Fusion Model" document. ACSA solicited feedback on the model from all of its 129 member schools within a short time frame. Ninety-four Faculty Councilors and school administrators responded. The results are summarized below, with full information provided in an appendix.

ACSA's survey and response to the Fusion Model should be considered in the context of our nearly two-year process of analyzing NAAB's current Conditions, including the February 2008 ACSA Architectural Education and Accreditation report, which outlined core values and specific recommendations for changes to the accreditation Conditions and process. This information, along with NAAB's Fusion Model are available at both the ACSA and NAAB websites (www.acsa-arch.org; www.naab.org).

Key Survey Findings
- 78% believe that schools need more flexibility in developing innovative programs.
- 72% believe that the curriculum is over-packed with requirements as it is.
- 71% believe change is needed in the Student Performance Criteria regarding stewardship of the environment.
- 67% support a more formal assessment of NAAB itself, as outlined in the proposed fusion model.
- 25% believe that mandatory enrollment of students in IDP while in school is viable.

There was no strong collective sentiment regarding other issues outlined in the survey. Opinions were divided and many respondents were neutral regarding specific issues or change. Given the clear opinions on specific issues expressed above, such neutral responses regarding other issues could be indicative of a general acceptance of the existing system.

Select Narrative Comments
General Comments
- Although I sincerely share the importance and usefulness of the self-evaluation gained through the APR, and sincerely appreciate the evolutionary attempt of the new leadership, please take in account that, without the overload of the preparation for the visit, faculty and administration run on full steam. Any added burden to learn new ways may hurt the quality of the academic process, consequently the students.
- The current model of education is producing great architects - maybe. the best in the history of architectural education – don't forget that. The system could use some minor adjustments
"Fusion Model": Substance
- Consolidating and simplifying rather than expanding and adding more levels of complexity should be the goal of any change to the accreditation process.
- I appreciate the implied pressure for the institution to demonstrate support for the program.
- It is not clear from the document provided that the actual bases of evaluation are being changed, rather they appear to be grouped differently and then reference is made to changing the SPC's and the conditions… It is difficult to determine from the document how significant the changes…will be. `
- The expansion of NAAB's mandate into parts of the process external to the academy is unacceptable.

"Fusion Model": Format
- The Fusion model is a format change with no content: it is an empty structure. As such, it is hard to fully understand and evaluate.
- Yikes! I like the conditions broken down into 13 parts. The "2 measures of success" model is scary. It''s like trying to describe the building code in 2 parts.

Student Performance Criteria
- Where is the creative process taught?
- I would like to see emphasis on emerging areas for leadership in the profession and society, including sustainability and integrated practice.
- I would like to see the return of "awareness" because our students need to become aware of more information than there is time to teach to the level of understanding. If we can foster awareness in school, students can know what to seek greater understanding and mastery of during internship.

ACSA SURVEY REGARDING FUSION MODEL AND ACCREDITATION ISSUES
September 5, 2008

	QUESTIONS AND TOPICS: 94 Respondents / Survey sent to faculty concilors and administrators at 129 schools.	Average Response	% AGREE or Strongly AGREE	% Neutral, AGREE, Strongly AGREE		Strongly DISAGREE	DISAGREE	Neutral	AGREE	Strongly AGREE
A	**Rate the extent to which the following areas need change related to Student Performance Criteria**					1	2	3	4	5
1	Stewardship of the environment	3.88	71	90		6	4	19	38	33
2	Understanding of integrated practice	3.44	54	82		8	9	28	36	18
5	Critical Thinking	3.42	53	77		11	11	24	28	25
6	Verbal Communication	3.26	39	80		6	13	41	24	15
7	Visual Communiction	3.17	37	78		9	12	41	24	13
4	Design Process	3.12	33	77		12	11	44	19	14
3	Technical Issues	2.92	26	77		6	11	51	19	7
8	Integration of internship issues in educattion	2.92	33	65		11	23	32	26	7
B	**Rate the extent to which the following areas need change related to Institutional Support**					1	2	3	4	5
2	Program enrichment opportunities	3.39	50	86		7	6	36	38	12
1	Human resource development	3.37	53	84		9	5	31	40	13
3	Emphasis on financial resources	3.30	48	79		9	12	31	36	12
4	Emphasis on physical resources	3.26	41	80		12	7	39	22	19
C	**Do you agree with these statements?**					1	2	3	4	5
2	Schools need more flexibility in developing innovative programs	4.09	78	85		5	9	7	25	53
1	The curriculum is over-packed as it is	3.89	72	85		6	8	13	32	40
3	Inconsistency in **team training** and in the interpretation of the Conditions is a significant problem	3.58	56	83		5	12	27	32	24
6	The **accreditation process** contributes to the overall quality of architectural education	3.37	51	74		7	19	23	32	19
5	Programs should be required to have a certain number or percentage of **registered architects on faculty.**	2.95	42	55		20	25	13	24	18
4	Mandatory **enrollment of students in IDP** while in school is viable	2.44	25	44		32	24	19	18	7
D	**Rate your agreement with the following statements regarding the Fusion Model**	JKO90JKJK	%			1	2	3	4	5
4	A more formal assessment of NAAB itself, as outlined in the proposed model, is important.	3.88	67	88		1	11	21	33	34
3	The current Procedures have served us well and need minor modifications.	3.24	44	72		3	24	28	31	13
2	The current Conditions have served us well and need minor modifications.	3.23	45	70		3	26	25	32	13
1	The model can improve architecture education more than the current Conditions and should be developed further	2.95	34	74		8	14	40	31	3

POLL SUMMARY (questions in each section ordered to show highest level of agreement)

POLL TABULATION (Scores shown are percentages)

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ACSA SURVEY REGARDING FUSION MODEL AND ACCREDITATION ISSUES
September 5, 2008

Below are comments provided during the survey. One general comments question was included in the survey. The responses below have been categorized for presentation.

STATUS (administrator, faculty councilor, both, neither)	RESPONSE
GENERAL COMMENTS	
program administrator	The current model of education is producing great architects - maybe the best in the history of architectural education - don''t forget that. The system could use some minor adjustments - I would like to see a way that we could reduce the professional course load - but that''s about it.
neither	measure each school based on individual criteria as described by the school, the best system we ever had
both	Seems like more to do!! Would not like to see quantitative/qualitative limits become prescriptive. That would hinder diversity, innovation, unique character of each program
program administrator	-Seem to place equal importance on the internal governable issues (#1), and the ungovernable Institution-bound, mainly financial conditions. -The quoted references are not widely available, so members not in the "inner circle" are handicapped. -Although I sincerely share the importance and usefulness of the self-evaluation gained through the APR, and sincerely appreciate the evolutionary attempt of the new leadership, please take in account, that without the overload of the preparation for the visit, faculty and administration runs on full steam. Any added burden to learn new ways may hurt the quality of the academic process, consequently the students.
Administrator	'I find the statement of the Fusion Model as a "new paradigm" to be overstated. It is more accurately a re-categorization of the existing Conditions. I think we do harm--however excited each new team may be each six years about their work in working on the Conditions and Procedures--when we state that we are changing everything or making a new paradigm when actually the standards are being evolved strategically in these cycles. It is important to be seen to be building on the work of previous cycles and making appropriate adjustments--for the validity of the process overall to show that we have something to build on (our past work) in making future standards. It would be a little less triumphant in tone, and more substantial in actuality. Or, if we do actually seek a new paradigm, I would think it would be far more radical and far reaching that what is presented here. I was not part of developing previous Conditions or Procedures, so have no vested interest in this. I believe that a more stewardly role and tone would be better.'
program administrator	Accreditation is important but the new model is still **over regulated**
program administrator	Any way that **redundancy** can be reduced would be appreciated

both	**Clarity** is the single most important issue and the primary concern that needs to be addressed. A glossery of terms would be useful. The current one serves well except for duplication of questions, and lack of clarity on the characteristics of an answer that are expected or preferred.
program administrator	From all discussions, it appears that the Collaterals felt that what is currently in place should be maintained on the whole, with some strategic improvements. Taking the approach to fully re-organize the Conditions, with a structure of considerable hierarchy, allows significant change---the character of which has not yet been disclosed by the Fusion Model proposal.
THE FUSION MODEL: SUBSTANCE	
both	The new requirements must be sensitive to related financial costs, both to the institution and to the students. Many schools are striving to educate very well with limited fiscal resources**, let's not burden these schools and students with mandatory expenses** like mandatory IDP enrollment.
program administrator	**I appreciate the implied pressure for the institution to demonstrate support for the program.**
program administrator	Having been through three accreditation cycles, I have seen the amount of reporting, responses to revisions, and curriculum shifting increase at a rate that seems to be growing at a faster rate each year. I fully support the accreditation process but do find that it consumes vast amounts of time from the programs. My concern with some of the changes in the Fusion Model is that it keeps asking the programs to increase what they do (and even lists growth and development as a separate item) but resources and space within many institutions can not keep pace with our current situation. **Consolidating and simplifying rather than expanding and adding more levels of complexity should be the goal of any change** to the accreditation process. One of the white papers was titled "Less is More" but I am not convinced that the changes recommended are truly less to achieve more.
program administrator	I read the whole thing carefully and **I don''t think it is necessary - it seems like a lot of thrashing similar content for no reason.**
program administrator	Intentions are good, but we need examples. The notion of pressing the boundaries of knowledge through architectural research is critical to the profession, but is not even acknowledged in the fusion model. **Perhaps there could be a way to include criteria for institutions that have research as their mission**.

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program administrator	NAAB's description of the Fusion Model, is a new structural framework for organizing the formerly know as 13 Conditions. What would be the objective of this restructuring? The proposed structure has greater hierarchy. The change is frrom 13 Conditions to 2 Measures, which are then defined by several thematic "clusters" of content. The content of the clusters is the current / consolidated/re-written 13 Conditions for Accreditation. How does this new structure provide an improvement to current accreditation practice? What are the goals of this new structure? And what content is consolidated and re-written? There is wording that raises an eyebrow, and I think this wording should raise concern from our membership...these terms are: [re]organize, [new] thematic groupings or clusters, re-grouping of content, new and revised criteria, definitions of evidence....will be expanded, {programs are]expected to integrate, expected to incorporate....all of which are terminology that suggests a root of substantive change...that will impact schools....but the goals of which are unclear and we are unable to evaluate. The last section of the Fusion Model is "Forthcoming Actions", and reads as a development plan to execute a model, whose goals and objectives are commonly held...these goals and objective have not been conveyed. The remaining conditions have been rewritten and consolidated.....which conditions are remaining....1-12 have already been mentioned. On what basis are they re-written? "Programs will be expected to demonstrate the extent to which they incorporate elements of internship and preparation for professional experience into professional education." Does introducing IDP fulfill this criteria?
program administrator	I **am concerned about the implied expanded oversight of evaluation of transfer students.** The wide range of capabilities and conditions from which these students arrive will make this review quite cumbersome. I feel that this is the sole purview of the institution. Final assessment of student ability at each class and at graduation should be sufficient. This is beyond the charge of NAAB as is the evaluation procedure for incoming freshmen from the variety of high school quality levels. This is an "insitutional rights" issue.
the faculty councilor	The model states "pre-professional education" and "IDP" but nowhere states "professional education" ?????
program administrator	has the document adequately addressed the key challenges identified by most of the collaterals: sustainability, integrated practice, and leadership? This will, presumably, be worked out by the writing team. How does the NAAB writing team dovetail into this process? Will there be further chances for input after the ARC?
the faculty councilor	It seems that the model is attempting to simplify both the process and terms of accreditation in favor a deeper more rigorous accreditation review. **This seems like a step in the right direction. However**, in the process of simplifying the conditions into two measures, the **criteria for those two measures should be rigorously considered** in light of changes in the profession and discipline.

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program administrator	I have chosen not to fill out the survey because in my opinion it does link to the most important issues of the "Fusion" document I received. The content within the document is redundant. Documents are alluded to, but the relevent or applicable information is not specified. The document conflates NAAB procedural issues with accreditation procedures as well as accreditation content issues. Likewise the "Fusion Model" diagram has way too much information and few clues as to how to prioritize the the narrative information and symbolic graphics. **Generally, I would advise the committee to use the ACSA Architectural Education & Accreditation Report as a model whose narrative and graphics are clear, precise and far more useful.**
program administrator	It is not clear from the document provided that the actual bases of evaluation are being changed, rather they appear to be grouped differently and then reference id made to changing the SPC''s and the condition s. **The expansion of NAAB''s mandate into parts of the process external to the academy is unacceptable.** The introduction of arbitrary and numerical criteria is in compatible with the notion of outcomes based evaluation.
	It is difficult to determine from the document how significant the changes to the current accreditation process will be. It appears that from the use of "Measures of Success" (which are not clearly defined) that the overall changes could be significant. A streamlining and simplification of the process would probably be welcomed by all, but is this really what is being proposed? Many of the ideas for reorganizing the C and P (including clustering SPC) appear to be sound. My largest concern has to do with the amount of work already undertaken by schools to prepare the APRs and to get ready for visits, any new process should not entail more work. If it is different work then that seems fine, and reduced work would be a benefit.
	the statement that the "NAAB expects institutions to demonstrate a long-term commitment to the growth and development of the program" (p. 3) seems inappropriate. Is it NAAB's business to determine if a school is growing, shrinking or maintaining a status quo position?
THE FUSION MODEL: FORMAT	
program administrator	It appears to be more of a re-shuffle than a significant overall change.
both	Yikes! I like the conditions broken down into 13 parts. The "2 measures of success" model is scary. It''s like trying to describe the building code in 2 parts. Sometimes more parts are helpful.
program administrator	This model appears to make the C&P **more inclusive and less prescriptive**, which is a very good thing.
0	How will the Fusion Model deal with the "Potemkin Model?" That is, how will this address the reality that I have observed (and participated in 3 schools) of creating a false front and fake reporting to meet the NAAB criteria and pass the visiting team review?
program administrator	This proposal is too **ambiguous**, dangerously so. It is uncertain why the reformatting of the sections is necessary. The substance of education is not addressed.
program administrator	it is not fusion; it is merely an hybrid
program administrator	The Fusion model is a **format change with no content**...and as such is hard to fully understand and evaluate

program administrator	The fusion model should be attached, a part or at least linked to this survey for better and more informed response
program administrator	The information on the fusion model was **unclear** to me.
program administrator	The information that was included is **not in any way a formal model**. Model need to demonstrate, this one does not.
program administrator	Approaches for clustering existing conditions and SPC...isn't this related to the overall structure of this new model? What are we trying to accomplish with a new clustering---how will it be an improvement? 13 Conditions to Two Measures: The benefit the 2 part structure; Educational Outcomes + Institutional Support, over the current 13 part Conditions is not clearly stated. Conditions 1-12 are clustered ---to what end? what is the underlying principle of improvement for this re-organization?
program administrator	I believe the document needs a preamble (rather than the very cryptic Objectives section) which provides a brief context and background statement. It is interesting to note that "the individual aspirations of many" are being factored into the process.
STUDENT PERFORMANCE CRITERIA	
program administrator	I would like to see **the return of "awareness"** because our students need to become aware of more information than there is time to teach to the level of understanding. If we can foster awareness in school, students can know what to seek greater understanding and mastery of during internship
neither	**Where is the creative process taught?** How can you talk about FUTURE practice and teaching practices when there are no more than two architects in the country that are futurists? Naab anchors architecture to the past and has no room for emerging domains. Where is the vision when you only look to the past and present? How can architecture morph to meet accelerating change?
the faculty councilor	Studio Culture, if it is to remain a point of evaluation, should be better defined in light of the last few years'' experience with this topic. **The move to cluster SPC around qualitative learning modes and principles seems very promising** - hopefully this will reduce the current emphasis on skills checklists in the technology-oriented criteria. Environmental stewardship / sustainable design, while very important, should not be allowed to overwhelm the SPC by cropping up everywhere.
program administrator	I would like to see emphasis on **emerging areas for leadership** in the profession and society, including sustainability and integrated practice.

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program administrator	Sustainability currently exists as a SPC, but the spirit of sustainability should permeate all aspects of accreditation (i.e., purchase of Carbon offsets for Visiting Team Travel -- of course this will likely be a problem with many institutions). But to the degree that Annual Reports, aspects of the actual team visit, the APR, etc., could become on-line documents we might be able to reduce paper and have more productive use of information. Integrated practice is important, but as with most issues of practice, the term of internship is the best place to deal with this. Also issues like Construction Cost Control are issues that students should be "aware of" but should not become "understanding" elements of SPC. This is what IDP should be about if AIA/NCARB would do their job. Regarding internship issues students should know that many practitioners do not look out for employees' best interests with regard to IDP. IDP success is largely the responsibility of AIA/NCARB.
Program Administrator	The 34 SPC remain, but are however consolidated, added to, and grouped by clusters....to what benefit? and by what goals? or agendas? "Ability and Understanding" remain, however "programs will be required to demonstrate the at clusters are integrated across the curriculum, while others can be addressed in specific courses.." Schools should be allowed to choose/define how the educational outcomes are derived. "definitions of evidence of student achievement will be expanded...." I don't fully understand the nature of this statement---does NAAB define what is evidence of student achievement---don't our schools determine the appropriate means and outcomes for learning objectives?
Program Administrator	The statement in the document on page 4 dealing with internship adopts the NCARB position and is highly problematic.
IMPLEMENTATION	
program administrator	**When does it go into effect**? Which programs will be responsible for writing their APR in the new format?
both	Ultimately **the attitude of the team** that does the accrediting is of paramount importance to the process. It is key to have participants who are open minded and can see the big picture of the goals/aspirations and appropriateness of a particular program. It is important that any update to the conditions reflect this as part of the measure for the accrediting team.
program administrator	the goals seem admirable, but in my experience, this will need **time for implementation**. How can schools understand what is expected (if it is different) when the documents are under development. Schools need 3 years notice if the criteria is going to change or the new criteria should not impact their accreditation, until the subsequent visit.
	NAAB needs to be held more accountable. Assessment of the success/failure of NAAB C&P is absolutely essential. I have the impression that this process has been proceeding without a hard look at NAAB and whether or not C&P currently in place have measured rates of success/failure.
	I believe that the 5 year cycle for reviewing (and changing) the C and P is too short. It is actually shorter than a full accreditation term. I think an 8-10 year cycle is more reasonable. While one is always looking for more rigor and consistency in the visiting teams is this a priority?