

November 27, 2013

To: NAAB Directors

From: Norman Millar, President

RE: Draft 1 of 2014 NAAB Conditions for Accreditation

Thank you for the opportunity to comment on the proposed Conditions for Accreditation. We provide the following seven recommendations based on discussion with the ACSA membership and Board of Directors.

As noted in the fourth recommendation, we would like to create a discussion group on the topic of digitally mediated learning. We hope that NAAB will participate with us in this discussion and help to create its agenda, so that together we may develop a stronger context for a Condition related to physical and digital learning environments.

### 1. Condition II.2.1, Regional Accreditation

Proposed Condition II.2.1, Regional Accreditation, would allow schools that do not have U.S. regional accreditation to seek full NAAB accreditation. This would allow international programs to seek accreditation and, with current NCARB policies, would allow graduates of such programs direct access to the U.S. licensure process.

We have serious concerns about the wording of the Condition in this draft. International mobility is well underway in the academy, and we acknowledge that schools outside of the United States have an interest in NAAB accreditation. We believe this interest is positive for architectural education overall.

Simply put, requiring regional accreditation has not stopped foreign schools from seeking NAAB accreditation. The 2009 standard, which requires regional accreditation, ensures baseline levels of quality that all schools should meet without NAAB having to ensure other standards of quality.

The following points reflect our overall belief that this Condition is not ready for adoption and should not continue in the next draft without further discussion.

- A. ***The Condition sets a double standard for the quality of parent institutions that is higher for U.S. schools.*** The Condition does not address what standards or procedures will ensure equivalency to U.S. regional accreditation and how NAAB teams and board members will judge those comparisons. Letters from government or regional authorities by themselves should not serve this purpose.
- B. ***The current Substantial Equivalency process is sufficient for measuring the quality of foreign graduates.*** The difference between substantial equivalency and full accreditation rests largely on regional accreditation. Taking the next step to full accreditation returns to our point that regional accreditation is a significant achievement by parent institutions that ensures the overall quality of architecture graduates.
- C. ***The Canberra Accord process is a better framework through which to facilitate mobility of graduates.*** The Canberra Accord recognizes the equivalency of graduates of several other major educational systems where architectural education and higher education are similar in structure. Again, this process is sufficient for providing foreign graduates access to the U.S. market without setting up double standards for U.S. schools.
- D. ***International accreditation is resource intensive and will detract from the NAAB's core focus of professional accreditation.*** Ensuring foreign schools meet the standards implied by regional accreditation increases the time and effort of visiting teams, the board of directors, and staff. The costs for accreditation of architecture programs already significantly exceeds that of peer disciplines, and foreign accreditation is not an expansion that, on a net basis, will benefit the whole of U.S. architectural education and practice.
- E. ***International accreditation requires a reexamination of all Conditions for Accreditation.*** Foreign programs operate in widely different contexts, including with different cultural norms and practices. This should not in itself prevent educational exchange or validation. However, it does call for an examination of other NAAB Conditions that, until this point, have been focused primarily on the U.S. university context, such as diversity and social equity.

## 2. Condition I.1.4, The Five Perspectives

The ACSA supports the decision to divorce the Perspectives from the collateral organizations. We believe the Perspectives should reflect issues important to the architecture profession that cut across the professional curriculum and that cannot be properly measured in a Student Performance Criterion or other Condition. **We recommend more brevity in the Perspectives descriptions and continued work to reduce redundancies between the Perspectives and the Student Performance Criteria.** Through the winter we will work to develop more concrete suggestions for wording to achieve this.

## 3. Condition I.2.2, Physical Resources

This Condition requires programs to address how “online course delivery” changes space and physical resource requirements. However, higher education has moved beyond a binary world of in-person versus online education. **We recommend that NAAB (a) ask programs to address what the impact of online, in-person, or hybrid formats have on digital and physical facilities, and (b) that NAAB harmonize its requirements with those of regional accrediting bodies.**

ACSA would like to offer a study group to work with NAAB on this recommendation from January to May.

## 4. Condition II.2.2, Professional Degrees and Curriculum

**A. We support NAAB’s indication that this Condition be revised so that it does not forbid transfers and impede articulation agreements between community colleges and architecture programs.**

**B. The ACSA recommends the NAAB remove the new text to Condition II.2.2 that states**

Institutions offering the degrees B. Arch., M. Arch., and/or D. Arch. are required to use these degree titles exclusively with NAAB-accredited professional degree programs.

Any institution that also uses the degree title B. Arch., M. Arch., or D. Arch. for a non-accredited post-professional degree program must initiate the appropriate institutional processes for changing the titles of such degree programs by June 30, 2018.

Titling of degrees not accredited by NAAB is the purview of institutions, not the NAAB. The ACSA understands that NAAB’s concern is potential confusion over degree titles by the public, and we support the need for clarity in titles. This can be done in other ways, however, such as through the public information Condition.

## 5. The Scope of Student Performance Criteria

**The ACSA suggests reverting to the 2009 Conditions text framing the purpose of the Student Performance Criteria.** The recommendation is to undo the edits shown here:

*Part Two (II): Section 1–Student Performance–Educational Realms & Student Performance Criteria  
The accredited degree program must demonstrate that each graduate possesses the knowledge and skills defined by the criteria below. The knowledge and skills defined here represent those required to move to the next stage in career development including internship. ~~The knowledge and skills are the minimum for meeting the demands of an internship leading to registration for practice.~~*

The original wording orients the SPC to content required for a career in architecture that continues toward licensure. Given the balance of practitioners and educators on the NAAB board and on most visiting teams, we think the *Conditions for Accreditation* should remain focused on professional content within NAAB-accredited programs, rather than dealing with the broader scope in which programs consider themselves, such as educating students for lifelong careers in a wide range of areas. Until the Conditions and Procedures change significantly, NAAB should not be measuring programs on their ability to educate students for all careers.

## 6. APR Guidelines

**A. The ACSA recommends publishing the draft guidelines for Architecture Program Reports (APR) with the next draft of the Conditions.** We support NAAB’s decision to clarify the Conditions and the details of how programs can satisfy them. Publishing the guidelines with the next draft of the Conditions will give all constituents a better idea of the full scope of changes to the Conditions and requirements. ACSA member programs continue to voice our request that NAAB reduce the amount of material required for visiting teams. We have identified faculty information and budget information as areas that are redundant or are not used in the accreditation process.

- B. ***The ACSA recommends adopting the guidelines for the same length of time as the Conditions.*** Schools are concerned about midstream changes to how they demonstrate compliance with the Conditions. A recent change to the Procedures that reduced by half the number of nonvoting members on visiting teams is an example of ways NAAB and the schools have disagreed on how the accreditation process is handled and how changes to the processes for accreditation can impact schools.

#### **7. Student Performance Criteria**

ACSA supports the changes so far to the Student Performance Criteria. ***We recommend that the writing team continue to work to revise the SPC to better differentiate Realm B, Integrated Building Practices, Technical Skills and Knowledge, from Realm D, Integrated Architectural Solutions.*** For example, removing the word “Integrated” from the title of Realm B may give the word more weight in the title of Realm D. We also encourage NAAB to detail further how teams will review the Realm D criterion.

We are assembling a team of people with experience in accreditation to further examine the SPC in detail.