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ACSA WORKING POSITIONS DRAFT 1 OF 2014 NAAB CONDITIONS FOR ACCREDITATION

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1. International Accreditation

Background. 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. Condition II.2.1 raises more questions than it answers. For example:

- Regional accreditation guarantees standards in the United States that universities in foreign countries may not have to meet. Does the Condition introduce a double standard for quality of parent institutions?
- Why is the current Substantial Equivalency process not sufficient? It expedites the process by which graduates of those schools satisfy NCARB's Education Standard through the EESA process?
- The Canberra Accord process also recognizes the equivalency of graduates of several other major educational systems where architectural education and higher education are similar in structure. Why is this process already not sufficient?
- Will the introduction of this Condition and the launch into full accreditation of international programs require a significant devotion of the NAAB's time, effort, and resources?
- What are the benefits or drawbacks to the stakeholders in the profession that fund NAAB?
- Does a letter of permission from any government simply demonstrate equivalency to this condition required of American schools?
- How rigorous is the process of judging a university's equivalency to regional accreditation standards? Are there criteria for equivalency to American regional accreditation standards?
- Is this a threshold Condition that if not met, disqualifies a program for NAAB accreditation?
- Will different cultural norms and practices abroad necessitate a change or reduction in other Conditions that, until this point, have been focused primarily on the U.S. university context (for example, diversity and social equity)?

The ACSA cannot endorse this new change without significant clarification and discussion.

2. The Five Perspectives

Draft ACSA position: The ACSA applauds the decision to divorce the Perspectives (Condition I.1.4) 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. We also invite our members to suggests ways to condense the Perspectives to fewer than five.

3. Learning Environments

Draft ACSA Position. Condition I.2.2, Physical Resources, 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.

4. Mobility & Flexibility

Draft ACSA Position. Since the draft Conditions release, NAAB has clarified that Condition II.2.2, Professional Degrees and Curriculum, is not meant to forbid transfers and impede articulation agreements between community colleges and architecture programs. We support this clarification and the revision that will come in the next draft. Additionally, the ACSA is concerned about the table in II.2.2 that clarifies credit-hour requirements. ACSA advocated for NAAB to reduce the number of credits it requires, particularly for general education, which could be covered by the program's own regional accreditation or other existing requirements. We invite our programs to compare their curricula to the table to identify any significant impacts.

5. Degree Titles

Draft ACSA Position. 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 the 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.

6. The Scope of Student Performance Criteria

Draft ACSA Position. 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 SPCs to content required for a career in architecture that continues toward licensure. Given the 2:1 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.

7. APR Guidelines

Draft ACSA Position. The ACSA supports the NAAB's decision to clarify the Conditions and the details of how programs can satisfy them. A concern arises in the decision to separate the requirements for Annual Program Reports into a separate guidelines document, which the NAAB says could be updated each year.

The NAAB's intent is to allow for improvements in the process, which we support. We therefore ask that the NAAB release with the next Conditions draft a guidelines document for APRs and that these requirements not change until the next update of the Conditions. This way, programs will have a better idea of the full scope of changes to the Conditions and requirements.

The reason for this request is twofold. First, ACSA schools have requested 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. Second, 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 the NAAB and the schools have disagreed with how the accreditation process is handled.

8. Student Performance Criteria

ACSA Draft Position. There are numerous positive changes to the SPCs that remove redundancies and clarify meaning. We cannot address all of them here and ask our members to provide detailed comments below regarding specific SPCs, both concerns and commendations.

The separation of Integrative Design into a separate realm came out of the 2013 Accreditation Review Conference and was generally supported at the time by ACSA representatives. We advocated for a removal of lists of sub-SPCs and for NAAB to consider ways in which the purpose of the "comprehensive design" SPC could be focused more on the ability of students to integrate systems and other aspects of the design process into one or more major projects. We support the direction of the wording in the draft and encourage NAAB to continue to refine the text that differentiates **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.