

November 27, 2024

To: National Architectural Accrediting Board

From: Cathi Ho Schar, FAIA, ACSA President

Re: NAAB's Proposed Changes to the Conditions for Accreditation

On behalf of our Board of Directors, please find our comments on the proposed revisions to the Conditions for Accreditation. The revisions related to equity, diversity, and inclusion drew the most concern. We sought input from architecture program leaders in public universities in states with the most restrictive anti-DEI legislation in place that do not provide explicit exceptions for complying with accreditation standards. We have also consulted our legal counsel as well other accrediting organizations that include anti-racism and diversity, equity, and inclusion in their accreditation standards. We hope the NAAB will consider other solutions to addressing the legal landscape beyond a complete rollback of the Conditions pertaining to these issues.

Our comments on the revisions follow. We would like to offer to convene a group of educational leaders to work with NAAB on ways by which the accreditation can continue to uphold the profession and discipline's commitments to racial and social equity without compromising the ability of architecture programs to comply with state and federal laws.

1. General Feedback on the Proposed Revisions

ACSA is concerned that NAAB is proposing a nationwide rollback of important DEI requirements rather than providing an exception in those handful of states that currently have anti-DEI legislation. Similarly, we question whether the proposed changes to accommodate the Supreme Court decision regarding admissions are broader than necessary.

ACSA recommends that NAAB provide explicit language through which schools can seek an exception because compliance would be a violation of state or federal law.

In other cases, we find the changes to be disproportionate, changing the original intention of a Condition or Criterion without explanation or opportunity for discussion across education and practice.

Additionally, NAAB made changes to the Introduction section for which it does not give space for comment in the survey. These changes effectively rewrite the history of the two-year process of discussion among stakeholders of the changes that led to the 2020 Conditions. We think the language should be preserved.

2. Shared Values

Rename to “Equity in the Architecture Profession.” These values were agreed upon by representatives of ACSA, AIA, NAAB, NCARB, AIAS, and NOMA at the Accreditation Review Forum, including the sentence, “Architects seek fairness, diversity, and social justice in the profession and in society.”

3. PC4 History and Theory

The revision is unnecessary, with major implications for how programs would teach architectural history. This criterion should not focus on the history of the *profession*. At many institutions, architectural history survey courses that fulfill this program criterion also serve as the department’s contributions to general education offerings to students in other departments.

4. PC.8 Cultural Awareness

The revised title clarifies the content and expectation of the criterion, and differentiates it from Condition 5.5. However, striking the word *diverse* seems unnecessary.

5. 5.5 Supportive Environments

Do not change the title of this condition. Instead, consider expanding it to include Belonging and Accessibility (DEIBA—Diversity, Equity, Inclusion, Belonging, and Accessibility).

The extensive edits diminish the original intent. The proposed changes also introduce an entirely new set of conditions. These changes would have significant impacts on programs that have not yet had to comply with the 2020 Conditions.

5.5.1

Preserve the wording on how to comply with this sub-requirement: “Describe how this commitment is reflected in the distribution of human, physical, and financial resources.” An alternative could be added: “Programs that cannot comment on this due to applicable law or institutional policy may instead provide a neutral description of how resources are distributed.”

5.5.2

Preserve the existing intent, rather than introduce an entirely new and different condition. How would a *program* “establish rights and responsibilities for safety, privacy, and dignity”? And how would NAAB determine if it is met or not met? An alternative could be added: “Programs that cannot comment using this terminology due to applicable law or institutional policy may instead provide a neutral description of changes in the composition of the program's faculty and staff, providing a numerical table of new hires, retirements, and separations.”

5.5.3

The requirement proposed here is already covered in general institutional accreditation, and is a legal requirement. Therefore, it is redundant and should not be subject to review by NAAB.

5.5.4

Eliminate the original sub-requirement if it is problematic. Adherence to EEO/AA standards is a pre-existing legal requirement for the entire institution. The proposed substitution, about complaints and retaliation, is not handled at the program level, and should not be subject to review by NAAB.

5.5.5

Preserve the existing language. The revision introduces a new sub-requirement. Policies for academic integrity and student/staff privacy are not set or determined at the program level and should not be subject to review by NAAB.

6. 5.6 Physical Resources

The addition of 5.6.5 is an overreach. Although disaster recovery is a potential issue for programs to consider, this is within the purview of the institution and should not be subject to review by NAAB.

7. 6.4 Public Access to Accreditation Reports and Related Documents

We support most of these changes, with the exception of removing the requirement to post statements and/or policies on learning and teaching culture and on diversity, equity, and inclusion (within the extent of the law).

Thank you for your consideration of our comments.