April 17, 2009

Douglas L. Steidl, FAIA
President
National Architectural Accrediting Board
1735 New York Avenue NW
Washington, DC 20003

Dear Doug and Members of the NAAB:

Since receiving the Final Draft of the 2009 Conditions on March 1, we have discussed the proposed changes with our membership and with the ACSA Board of Directors. Rather than waiting until the June 1 deadline for responses, we wanted to submit our response as soon as possible, giving you more time to consider our various recommendations. As we requested at the meeting in Portland, ideally we would appreciate the opportunity to review a next draft as well.

Overall, the ACSA supports the changes to the Conditions, including the two-part format related to institutional support and educational outcomes. Based on feedback from our members and extensive discussions of the ACSA board, we are providing additional feedback on the Conditions in the enclosed Executive Summary and Detailed Comments. Our feedback focuses on five areas:

- Refinement of Student Performance Criteria
- Comprehensive design
- Reporting requirements
- Faculty credentials
- Curricular matrices

The Conditions document, by definition, is detail-oriented. As we finalize the 2009 Conditions, we would like to assure that detailed requirements and definitions align with the broad goals of accreditation in defining minimum standards of educational quality for all schools: "standards without standardization."

It is in this spirit that we have reviewed the Conditions. We would be happy to answer any additional questions and look forward to the next steps.

With best wishes,

Marleen Kay Davis, FAIA
President

cc: Michael J. Monti, PhD

Enclosure

ACSA RESPONSE TO NAAB 2009 CONDITIONS FOR ACCREDITATION, PUBLIC COMMENT EDITION

Executive Summary

Based on the feedback of our membership and extensive discussions within the ACSA Board of Directors, we are pleased that there have been no major 11th hour "surprises" with this complete draft of the Conditions. Overall, we agree with the restructured way of presenting the Conditions, in a two-part format related to institutional support and educational outcomes. We feel that many of our ACSA recommendations have been honored: with the increased emphasis on sustainability; with the less-prescriptive wording of most of the Student Performance Criteria (SPC); with the emphasis on faculty development; with the clustering of SPCs into areas related to core values, rather than curriculum; and with the broad emphasis on leadership and ethics as part of professional coursework in integrated practice.

Our attention has also been drawn to the many detailed aspects of accreditation that were introduced with this draft. Our detailed comments address specific areas of concern. They are grouped under five key areas, summarized here:

Refinement of specifications for some SPCs
- o Clarification of SPCs related to "site design," "environmental design," and "sustainable design"
- o Concern regarding redefinitions of "understanding" and "ability"

Redefinition of "Comprehensive Design"
- o Including the "preparation of a program" as part of comprehensive design virtually insures a year-long project, and could be considered an inappropriate curriculum dictate by NAAB.
- o As written, it is uncertain if the Comprehensive Design must meet 13 listed SPC, or simply incorporate aspects of the different topics (as previously defined).
- o The new definition seems to depart from the previous understanding of comprehensive design as the experience in school that most approaches "Design Development."
- o We are surprised, too, by the removal of integration of Building Materials and Building Systems.
- o This transformed view of Comprehensive Design was not part of the discussions last fall at the Accreditation Review Conference.
- o We would recommend using language similar to the 2004 definition.

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Decreasing overly prescriptive reporting requirements throughout
> We believe some of the information required for the APR is overly prescriptive and only marginally related to the quality of the school or the students' education. In a climate of dramatic budget cuts, the extensive faculty/staff time required to assemble this information will further limit a school's ability for innovation and change. Specific concerns are noted in our comments throughout Part One and Part Two.

Amending requirements related to faculty credentials
> With the exception of a roster of courses and faculty, the repetitive requests for narratives regarding qualifications and a "matrix of credentials" is information already included in the CVs.
>
> Rather than documenting faculty qualifications in multiple locations throughout the APR, we propose concentrating all information regarding faculty qualifications in the collection of two-page standardized faculty CVs, along with a simple roster of courses and faculty for easy cross reference.

Clarifying curricular matrices
> The Conditions should better address when separate matrices for separate tracks are required. Separate matrices should be required for each degree program as well as for distinctly separate degree tracks (curricula) within the same degree title at a given school. The matrix should include the required undergraduate professional courses in a given track.

In closing, we acknowledge that the Conditions document, by definition, is detail-oriented. As NAAB finalizes the 2009 Conditions, we would like to assure that detailed requirements and definitions align with the broad goals of accreditation in defining minimum standards of educational quality for all schools: "standards without standardization."

It is in this spirit that we have reviewed the Conditions, with our detailed analysis as appended.

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ACSA RESPONSE TO NAAB 2009 CONDITIONS FOR ACCREDITATION, PUBLIC COMMENT EDITION

Detailed Comments

This document identifies specific comments and recommendations regarding each section of the the NAAB Draft of the 2009 Conditions.
> *Italics: direct* **quote** *from NAAB FINAL DRAFT.*
> **Bold: specific area of concern to ACSA**
> ACSA's commentary is provided in standard text.

PART ONE: INSTITUTIONAL CONTEXT

Part One (I): Section 1 – Identity & Self-Assessment
I.1.1 History and Mission:

Overall, this section is clear and important.

Small recommendation regarding one of the APR Requirements:
> APR requirement #4
> *A description of the program and how its course of study encourages the holistic development of young professionals through a practical and liberal-arts education.*

This request seems redundant to other areas of the APR (Five Perspectives as well as General Education in Part 2) and seems to presume an undergraduate program in a university setting: this may not apply to some institutions.

I.1.2 Learning Culture:

> *The program must demonstrate that it provides a positive and respectful learning environment that encourages the fundamental values of optimism, respect, sharing, engagement, and innovation between and among the members of its faculty, student body, administration, and staff in all learning environments both traditional and non-traditional. The program must demonstrate that it encourages students and faculty to appreciate these values as guiding principles of professional conduct throughout their careers.*

> *The program must further document its efforts through narrative and artifacts for ensuring that all members of the learning*

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*community: faculty, staff, and students, are aware of these
objectives and are advised as to the expectations for ensuring they
are met in all elements of the learning culture.*

The APR must include the following:
- *A copy of all policies related to Studio Culture and academic
  integrity.*
- ***Evidence that the program and/or institution has
  established procedures for grievances related to
  harassment and discrimination.***
- ***Evidence that faculty, staff, and students have been able to
  participate in the development of these policies and the
  assessment of their effectiveness.***
- *Evidence that faculty, students, and staff have access to these
  policies and understand the purposes for which they were
  established.*

"Studio Culture" has been re-termed "Learning Culture." In the description of
"Learning Culture," the previous reference (in 2004 Conditions) to "time
management" has been left out. We believe this is unfortunate, as both students
and faculty need to realize that time management and realistic time expectations
are intrinsic to a successful learning culture.

Furthermore, "Social Equity" has been dropped as a stand-alone heading in the
2009 Conditions, and embedded in different areas. In general, efforts at
evaluating social equity seem to be related to data and policies, rather than
creating an environment of tolerance and respect. We suggest this be restored in
some form more visibly in the Conditions.

Regarding APR requirements 2 and 3 for harassment and discrimination policies,
most institutions have policies in place for grievances and harassment, usually
developed by the university's legal counsel. At those institutions, the third
requirement would be virtually impossible to meet.

The Studio Culture Policy was intended to be a school/program-specific
document in which students, faculty and staff develop, revise, and update the
policy. Simple "access" to the policy makes this more bureaucratic.

For this reason, we believe that overall a distinction should be made between the
legal institutional harassment policies and the internal program policies that
foster a learning culture of mutual respect.

I.1.3 Response to the Five Perspectives:

Programs must demonstrate through narrative and artifacts, how they respond to the following perspectives on architecture education. Each program is expected to address these perspectives consistently within the context of its history, mission, and culture and to further identify within its long-range planning activities how these perspectives will continue to be addressed in the future.

Overall, this section is clear and addressing the five perspectives is a very important part of the APR.

In I.1.3 of the APR, we believe schools should identify how the five perspectives relate to the long-range planning of the school. However, the long-range planning of the school should not themselves be structured around the five perspectives. In Section I.1.4, below, asking schools to define their mission and long-range planning specifically in light of the NAAB perspectives is a move towards standardization.

I.1.4 Long-Range Planning:
An accredited degree program must demonstrate that it has identified multi-year objectives for continuous improvement within the context of its mission and culture, the mission and culture of the institution, and the five perspectives. In addition, the program must demonstrate that data is collected routinely and from multiple sources to inform its future planning and strategic decision making.

The APR must include the following:
- *A description of the process by which the program identifies its objectives for continuous improvement.*
- *A description of the data and information sources used to inform the development of these objectives.*
- *A description of the role of long-range planning in other programmatic and institutional planning initiatives.*
- *A description of the role the five perspectives play in long-range planning.*

I.1.5 Self-Assessment Procedures:
The program must demonstrate that it regularly assesses the following:
- *How the program is progressing towards its mission.*
- *Progress against its defined multi-year objectives (see above) since the objectives were identified and since the last visit.*

- *Strengths, challenges and opportunities faced by the program while developing learning opportunities in support of its mission and culture, the mission and culture of the institution, and the five perspectives.*
- *Self-assessment procedures shall include, but are not limited to:*
  - o *Solicitation of faculty, students', and graduates' views on the teaching, learning and achievement opportunities provided by the curriculum.*
  - o *Individual course evaluations.*
  - o *Review and assessment of the focus and pedagogy of the program.*
  - o *Institutional self-assessment, as determined by the institution.*

The program must also demonstrate that results of self-assessments are regularly used to advise and encourage changes and adjustments to promote student success as well as the continued maturation and development of the program.

The APR must include the following:
- A description of the school's self-assessment process, specifically with regard to ongoing evaluation of the program's mission statement, its multi-year objectives and how it relates to the Five NAAB Perspectives.
- ***Faculty, students', and graduates' assessments of the accredited degree program's curriculum and learning context as outlined in the Five Perspectives.***
- A description, if applicable, of institutional requirements for self-assessment.
- A description of the manner in which results from self-assessment activities are used to inform long-range planning, curriculum development, learning culture, and responses to external pressures or challenges to institutions (e.g., reduced funding for state support institutions or enrollment mandates).
- *Any other pertinent information.*

Comments regarding both Long-Range Planning and Self-Assessment Procedures:
In comparison to the 2004 Conditions, this area is significantly expanded, with some repetitive requests. Overall, the text and the requirements could be streamlined.

In I.1.3 of the APR, schools should identify how the five perspectives relate to the long-range planning of the school.

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In I.1.4 and I.1.5, schools should be free to develop a unique mission and long-range plan. The long range planning of the school should not be structured around the five perspectives. Asking schools to define their mission and long-range planning specifically in light of the "five perspectives" is a move towards standardization.

The APR narrative should describe how long-range planning and self assessment takes place as well as the results, but need not include the "assessments" themselves (bullet #2 in boldface above). We believe that copies of evaluations, polls, surveys and the like should be available in the team room, but need not be a required part of the APR, as it would be difficult to include this in a 136-page APR. This is an example of the "overly prescriptive" nature of the reporting requirements.

Part One: Section 2 – Resources

I.2.1 Human Resources & Human Resource Development:
- *Faculty & Staff:*
  - *An accredited degree program must have appropriate human resources to support student learning and achievement. This includes full and part-time instructional faculty, administrative leadership, and technical, administrative, and other support staff. Programs are required to document personnel policies which may include but are not limited to faculty and staff position descriptions….*

The Conditions narrative in this area is very good and will support quality education.

The role of the IDP Education Coordinator should be emphasized beyond "supporting students who have questions."

However, we believe that the reporting requirements (i.e. "the APR must include…") are overly prescriptive and should be generalized. Some of the specific requirements that ACSA has identified as problematic are the following:

Regarding the "faculty credential matrix":
  The APR must include the following:
  Faculty/Staff
- ***A matrix*** *for each faculty member that identifies his/her credentials and experience (including recent scholarship and research), the courses he/she was assigned during the four semesters prior to the visit, and the specific credentials, experience and, research that supports these assignments. In*

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the case of adjuncts or visiting professors, only those individuals who taught in the four semesters prior to the visit should be identified. (NOTE: This can be appended to his/her resume, see Appendix 2; copies should be available in the team room).

The focus on faculty credentials throughout the 2009 Conditions is resulting in redundant reporting requirements in multiple sections. The proposed matrix for each faculty member is very prescriptive: instead, the required information in the faculty CVs can address these concerns. (See ACSA recommendation for a 2-page CV with recommended headings: the one-page CV proposed by NAAB is too short.)

Moreover, we firmly support the role of the institutions in working with programs to set standards for faculty credentials in terms of internal policies and regional institutional accreditation.

Finally, there is no evidence in past Visiting Team Reports that faculty credentials and qualifications have been a significant area of concern.

Regarding other requirements for faculty and staff:
> *The APR must include the following:*
> *… [first bullet omitted here]*
> - *A description of the **institution's policies and procedures for sabbatical and** other opportunities for scholarship and research.*
> - *A description of the policies, procedures, and criteria for faculty appointment, promotion, and tenure and access to faculty development opportunities.*
> - *Evidence of how faculty members remain current in their knowledge of the changing demands of practice and licensure.*
> - *The school's policy regarding human resource development opportunities.*
> - *A list of visiting lecturers and critics brought to the school since the previous site visit.*
> - *A list of public exhibitions brought to the school since the previous site visit.*
> - *Evidence of the school's facilitation of faculty research, scholarship, and creative activities since the previous site visit, including the granting of sabbatical leaves and unpaid leaves of absence, opportunities for the acquisition of new skills and knowledge, and support of attendance at professional meetings.*

Many aspects of these requirements are too prescriptive, and language "such as" may be better than "including." Many institutions, even research universities, do

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not provide sabbaticals, and the implication that policies on sabbaticals are a requirement for accreditation should be removed.

Regarding APR requirements for Students:
The APR must include the following:
Students
- *A description of the process by which applicants to the accredited degree program are evaluated for admission.*
- *A description of student support services, including academic and personal advising, career guidance, and internship placement where applicable*
- *Evidence of the school's facilitation of student opportunities to participate in field trips and other off-campus activities.*
- *Evidence of opportunities for students to participate in professional societies and organizations, honor societies, and other campus-wide activities.*
- *Evidence of the school's facilitation of student research, scholarship, and creative activities since the previous site visit, including research grants awarded to students in the accredited degree program, opportunities for students to work on faculty-led research, opportunities for the acquisition of new skills and knowledge in settings outside the classroom or studio, and support of attendance at meetings of student organizations and honorary societies.*

Bullet #1 is redundant to Part Two, Section 3, procedures for admission and evaluation

Bullet #5, while well-intended, is too prescriptive and implies a research university context. This is a new requirement that should be dropped. Let each school address human resource development in its own way.

I.2.2 Administrative Structure & Governance:
- *Administrative Structure…*

This is similar to the 2004 Conditions and is reasonable.

I.2.3 Physical Resources:

This is similar to the 2004 Conditions and is reasonable.

The list of square footages per student required in Appendix 3 is of questionable value: there is no national standard in place and it is unclear how teams are to evaluate square footages.

I.2.4 Financial Resources:

The narrative is similar to the 2004 Conditions and is reasonable.

The reporting requirements have significantly increased and many administrators report that areas indicated in bold below will be difficult, if not impossible, to research.

> *An accredited degree program must demonstrate that it has access to appropriate institutional and financial resources to support student learning and achievement.*
>
> *The APR must include the following:*
> *Program budgets:*
> - *Current fiscal year **budget(s)** showing revenue and expenses from all sources.*
> - ***Forecasts for at least two years** beyond the current fiscal year.*
> - ***Budgets** for all prior fiscal years since the last visit.*
> - *Comparative reports that show revenue and expenditures for each year since the last accreditation visit from all sources including endowments, scholarships, onetime capital expenditures, and development activities.*
> - *Data on annual expenditures and total capital investment per student, both undergraduate and graduate, compared to the expenditures and investments by other professional degree programs in the institution.*
>
> *Institutional Financial Issues*
> - ***Pending reductions or increases in enrollment and plans for addressing these changes.***
> - ***Pending reductions or increases in funding and plans for addressing these changes.***
> - ***Changes in funding models for faculty, instruction, overhead, or facilities since the last visit and plans for addressing these changes.***
> - *Other financial issues the program and/or the institution may be facing.*

As a recommendation, the APR should include "comparative" budget summaries (as requested in the 2004 Conditions), rather than "budgets," which can be interpreted as extensive line-item accounting. The specific budgets should be available to the team during the visit, but need not be part of the APR.

Given unknown economic situations, administrators report that forecasts for the next two years will be difficult. Asking for a general enrollment plan and budget goals may achieve the intent of NAAB in understanding the future plans of a school. However, budgets are approved annually, and provosts do not always agree with the multi-year plans and priorities of their academic units.

As a recommendation, this area should be less prescriptive, allowing each school and institution more flexibility in how it reports its current and future financial situation in the APR. More specific budget information should be available to the team during the visit.

I.2.5 Information Resources:

The narrative is similar to the 2004 Conditions and is reasonable.

The reporting requirements have significantly changed, and have dropped the requirement for the Library Self Assessment Report, former Appendix C in the 2004 Conditions.

ACSA recommends continuing the use of the "Information Resources Self Assessment and Report " (Appendix B and C from the 2004 Conditions). These documents have been developed by the association of architectural librarians, who meet each year during the ACSA Annual Meeting. Their work identifies standards of quality for an architecture program. Any changes that NAAB would like to see in this area should be submitted to their group.

Note that the first sub-bullet below implies that the information resource "collection" is based on "number of titles" which implies books. The content of information resource collections is much more extensive, including access to databases, online content, films, maps, archives and the like.

> *The accredited program must demonstrate that all students, faculty, and staff have convenient access to literature, information, visual, and digital resources that support professional education in the field of architecture. Further, the accredited program must demonstrate that all students, faculty, and staff have access to librarians and visual resources professionals who provide information services that teach and develop research and evaluative skills, and critical thinking skills necessary for professional practice and lifelong learning.*

The APR must include the following:

- *A description of the institutional context and administrative structure of the library and visual resources*
- *An assessment of the library and visual resource collections, services, staff, facilities, and equipment that does the following:*
  - o **Lists the content of the current collection including number of titles and subject areas covered**
  - o *Evaluates the degree to which information resources support the mission, planning, curriculum, and research specialties of the program.*
  - o *Assesses the quality, currency, suitability, range, and quantity of resources in all formats, (traditional and electronic)*
  - o *Demonstrates sufficient funding to enable continuous collection growth*
  - o *Identifies any significant problem that affects the operation or services of the libraries and other information resource facilities.*

Part One: Section 2 – Institutional and Program Characteristics

I.3.1 Statistical Reports:
I.3.2 Annual Reports:

We believe the expanded reporting requirements are overly prescriptive, confusing in places, will involve extensive resources, and do not necessarily improve the quality of education. With the new NAAB data collection system implemented in 2008, we should move towards aligning APR requests with the new system.

ACSA Recommendations
Streamline the text, aiming for clarity:
- Ask for NAAB annual report data since 2008, which includes most of what is outlined here.
- Ask for a summary enrollment plan, tracking students from earliest point of entry into the professional track(s) to graduation, leaving the precise method of reporting this information up to each institution.
- Ask for a summary of student-to-faculty ratios and class sizes, leaving the precise method of reporting this information up to each institution.
- Add a specific section heading related to "Social Equity" with a request for a diversity plan, rather than burying this in a reporting requirement related to representation statistics and human resource development.

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Regarding the "certification of data":
The statement to be submitted by the university officer should be implemented in 2009, as part of the annual report. As stated, it implies that schools must research similar demographic data prior to 2008, seeking the signature for the data since the last accreditation visit. While a good idea, this may be counterproductive and not worth the valuable staff time in researching such detailed past data that would be "certified."

Regarding comparative statistics for tenure and licensure
- *Number of faculty promoted each year since last visit.*
  - *Compare to number of faculty promoted each year across the institution during the same period.*
- *Number of faculty receiving tenure each year since last visit.*
  - *Compare to number of faculty receiving tenure at the institution during the same period.*
- *Number of faculty maintaining licenses from U.S. jurisdictions each year since the last visit, and where they are licensed.*
  - *Compare to number of faculty teaching in other professional degree programs at the same institution who hold professional licenses or credentials during the same period (e.g., number of engineers teaching in an engineering program who have the P.E. designation).*

Administrators report that this comparative data across the institution would be very difficult to secure, and would be of questionable value. Since the PE in engineering does not require any professional experience, one wonders if it is a reasonable comparison. Other professional programs, such as nursing and education, have faculty who maintain certification and licensure as well. Monitoring other programs seems not to produce measures of quality in architectural education, and the time spent by the school researching and reviewed by the visiting teams would not improve architectural education proportionally.

As noted above, institutions and programs have credential and faculty-quality standards in place related to faculty qualifications, and there is no evidence in past VTRs that faculty credentials and qualifications have been a significant area of concern.

I.3.3 Faculty Credentials:
> *The program must demonstrate that the instructional faculty are adequately prepared to provide an architecture education within the mission, history and context of the institution.*

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> *In addition, the program must provide evidence through a faculty exhibit that the faculty, taken as a whole, **reflects the range of knowledge and experience necessary to promote student achievement as described in Part Two**. This exhibit should include highlights of faculty professional development and achievement since the last accreditation visit.*
>
> *The APR must include the following information for each instructional faculty member who teaches in the professional degree program:*
> - *His/her academic credentials, noting how educational experience and recent scholarship supports their qualifications for ensuring student achievement of student performance criteria.*
> - *His/her professional architectural experience, if any, noting how his/her professional experience supports their qualifications for ensuring student achievement of student performance criteria.*

The narrative is appropriate, but the focus on faculty credentials throughout the Conditions results in redundant reporting requirements in multiple sections.

Once again, institutions and programs have credential and faculty-quality standards in place related to regional accreditation and internal standards. There is no evidence in past VTRs that faculty credentials and qualifications have been a significant area of concern.

As a suggestion, ACSA recommends that the APR Appendix, sent to teams in advance, should include:

1 A roster of all required courses, listing faculty who taught the courses, over the last year or two years.
2 A two page CV for each faculty member involved in teaching over the last two years, with the following required information, including dates:
   - title
   - % fte, % fte in teaching (based on previous year)
   - education
   - licensure (noting year of initial and continued licensure)
   - academic experience
   - professional experience
   - significant honors
   - recent accomplishments
   - recent professional development
   - recent courses taught

It is important to centralize information regarding faculty credentials in one location (rather than in the multiple locations currently requested for the APR), and ACSA recommends that the CV Appendix is where this should be, cross-referenced with the roster of courses and faculty. A page limit on CV's is important, but the suggested "one page" is unrealistic, given that many faculty have extensive employment histories, let alone accomplishments.

The reference to the faculty exhibit as a means of reflecting the faculty's ability to address student achievement seems to imply that "evidence" of faculty competency related to the SPCs should be present in the exhibit. This language should be removed.

Part One: Section 4 – Policy Review

I.4   Policy Review:
The information required in the three sections described above is to be addressed in the APR. In addition, the program shall provide a number of documents for review by the visiting team. Rather than being appended to the APR, they are to be provided in the team room during the visit. The list is available in Appendix 3.
…
Appendix 3*:*
List of Documents to be Available in the Team Room (Part I: Policy Review)

The information requested in Part I, Sections 1-3 of the APR, is to be addressed in the APR. In addition, the program is expected to provide a number of documents for review by the visiting team. Rather than being appended to the APR, they are to be provided in the team room during the visit. These include but are not limited to:
- *Studio Culture Policy*
- *Self-Assessment Policies and Objectives*
- *Personnel Policies including:*
  - *Position descriptions for all faculty and staff*
  - *Rank, Tenure, & Promotion*
  - *Reappointment*
  - *EEO/AA*
  - *Diversity (including special hiring initiatives)*
  - *Faculty Development, including but not limited to research, scholarship, creative activity, sabbatical*
- *Student-to-Faculty ratios for all components of the curriculum (i.e., studio, classroom/lecture, seminar)*
- *Square feet per student for space designated for studio-based learning*

- *Square feet per faculty member for space designated for support of all faculty activities and responsibilities*
- *Admissions Requirements*
- *Advising Policies; including policies for evaluation of students admitted from preparatory or pre-professional programs where SPC are expected to have been met in educational experiences in non-accredited programs*
- *Policies on use and integration of digital media in architecture curriculum*
- *Policies on academic integrity for students (e.g., cheating and plagiarism)*
- *Policies on library and information resources collection development*
- *A description of the information literacy program and how it is integrated with the curriculum.*

While the required 136-page limit for the APR seems commendable, it also seems impossible that a single APR could include all the "APR must include" information as specified throughout the 2009 Conditions Draft.

ACSA recommends a three part concept for the APR:

APR—Report Narrative
- 150 page maximum narrative, including appropriate charts and outlines, in direct response to the Conditions, Part One and Two

APR—Appendix A: sent to teams in advance of visit
- Long Range Plan, if not provided in APR Narrative
- Studio Culture Policy
- Roster of Courses, with list of faculty who have taught over the last two years
- Faculty CV's Two page maximum, including content recommended above in I.3
- Curriculum Outline, for each degree program and or degree track information
- Matrix for each degree program or degree track, showing courses and SPC. Note: the matrix may indicate where the SPC is addressed "across the curriculum" as well as the 1-3 key   courses in which the material is specifically covered. An upper and a lower matrix seems too prescriptive
- Floor plans of facilities
- Additional reference information as determined by program

APR—Appendix B, in Team Room
- Course Descriptions: one page maximum

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- Information Resources Self Assessment Report
- Personnel policies
- additional reference information as determined by program
- many of the items listed in Appendix 3

Specific comments regarding Appendix 3
The requirement for an "information literacy program" seems too prescriptive and should be dropped. Again, we recommend the use of the standard Information Resources Self Assessment Report developed by architectural librarians.

The list of square footages per student required in Appendix 3 is of questionable value: there is no national standard in place and it is unclear how teams are to evaluate square footages.

PART TWO: EDUCATIONAL OUTCOMES

Part Two: 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 set out below. The knowledge and skills are the minimum for meeting the demands of an internship leading to registration for practice. The school must provide evidence that its graduates have satisfied each criterion through required coursework. If credits are granted for courses taken at other institutions or online, evidence must be provided that the courses are comparable to those offered in the accredited degree program. The criteria encompass two levels of accomplishment:*

> ***Understanding**—means the assimilation and comprehension of information without necessarily being able to see its full application. This includes the knowledge or familiarity with a particular subject, skill, or aspect of the student performance criteria.*

> ***Ability**—means the skill in using specific information to accomplish a task, in correctly selecting the appropriate information, and in accurately applying it to the solution of a specific problem. This includes a student's capacity or competence in a particular subject, skill, or aspect of the student performance criteria.*

ACSA Comment regarding Understanding and Ability
The language regarding "understanding " and "ability" has been derived from Bloom's Taxonomy of Learning objectives. The 2004 language was clear, while the additional language in 2009 seems to introduce "awareness" to understanding and seems to call upon higher level synthesis in "ability."

II.1.1 Student Performance Criteria

ACSA Recommendations on Specific SPC
A.3. Visual Communication Skills
    Change: "such as traditional graphic and digital technology skills" to "including analog and digital skills,"

A.9 Historical Traditions and Global Culture
    Change Title: Traditions and Global Culture

Realm B
    Order Realm B from parts to whole:
- Pre Design
- Site Design
- Accessibility
- Life Safety
- Structural Systems
- Building Envelope Systems
- Environmental Systems Integration
- Building Service Systems Integration
- Building Materials and Assemblies Integration
- Sustainable Design
- Financial Considerations
- Comprehensive Design

    AND, revise the titles to either consistently include the term "integration" or not.

B.3 Sustainable Design
    Suggested rewording: "*Ability* to apply the principles of sustainable design to produce projects that conserve natural and built resources, provide healthy environments for occupant/users, and reduce the impacts of building construction and operations on future generations; including methods for producing measurable outcomes."

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B.4 Site Design

Suggested rewording: Ability to respond to site characteristics—soil, topography, vegetation and watershed—in project design, and to understand the potential for regenerative design solutions.

B.9 Environmental Systems Integration

Suggested rewording: Understanding of the principles of active and passive environmental systems, including acoustical and lighting integrated with the building envelope; and understanding of embedded issues such as embodied energy, energy efficiency, indoor air quality, bioclimatic design, solar geometry, passive heating and cooling, daylighting, carbon-neutral design, and the application of appropriate performance assessment tools.

B.11 Building Service Systems Integration

While this SPC intends to combine sections 3.13.22 and 3.13.23 of the 2004 Conditions, the language of the former is present. ACSA does, however, support leaving this as is, since the old 3.13.23 is redundant with Comprehensive Design (B.6).

NEW SPC C.10

ACAA requested a new SPC in its 2008 Report, and while the title "community" appears in the Realm C bullets, a criterion that addresses the content is absent. We continue to recommend a new SPC:

"Community and Social Responsibility: *Understanding* of the architect's responsibility to work in the public interest and improve the quality of life for local and global neighbors, especially those typically without access to the design community."

ACSA Comment regarding Comprehensive Design

B. 6. Comprehensive Design: Ability to understand, and to produce a comprehensive architectural project that integrates the following SPC: A2; A3; A4; A5; A8; B1; B2; B3; B4; B5; B7; B8; and B9.

Note   A2   Design Thinking
A3   Visual Communication
A4   Technical Documentation
A5   Investigative Skill
A8   Ordering Systems Skills
B1   Pre-Design ("preparation of comprehensive program…")
B2   Accessibility
B3   Sustainable Design
B4   Site Design

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B6   Life Safety
B7   Financial Considerations
B8   Structural Systems
B9   Environmental Systems Integrations

As written, it is uncertain if the Comprehensive Design must meet 13 listed SPC, or simply incorporate aspects of the different topics. We are concerned that including the "preparation of a program" as part of comprehensive design virtually ensures a year-long project, and could be considered an inappropriate curriculum dictate by NAAB.

The new definition seems to depart from the previous understanding of comprehensive design as the experience in school that most approaches "Design Development." The removal of integration of Building Materials and Building Systems seems to move away from design development.

ACSA recommends using language such as the following:
Ability to produce a comprehensive architectural project based on a building program and site that includes development of programmed spaces demonstrating a holistic integration of design considerations related to aspects such as life safety considerations, building envelope systems, structural systems, active and passive environmental systems, and the principles of sustainability.

ACSA Comment regarding "The Matrix"
The APR must include:
- *A brief, narrative or graphic overview of the school's curricular goals and content for each accredited degree program offered.*
- *A matrix, for each accredited degree program offered, that identifies each required course with the SPC or SPC it fulfills.*
  - *The top section of the matrix should include those criteria that are demonstrated across the curriculum.*
  - *The bottom section of the matrix should include only those criteria that are demonstrated in a single learning experience.*
In all cases, the program must highlight the cell on the matrix that points to the greatest evidence of achievement.(For a sample matrix, see Appendix 4)
NOTE: Elective courses are not to be included on the matrix.

The Conditions (and not Procedures) should clarify that separate matrices should be provided for each accredited degree program track that has a distinct curricular structure, including required undergraduate professional courses. Separate accreditation should be given for the clearly distinct separate tracks within the same school, even if they have the same degree title.

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Some schools may have two distinctly different tracks, such as
- B.Arch and 4+[3] M.Arch.
- [4+2] and a 4+[3] M.Arch.
- [4+1] and a 4+[3] M.Arch.
- 5yr and a 4+[3] M.Arch.

Separate matrices should be provided even though the two different degree tracks may share many courses. The criteria for including separate matrices should be clear and should involve:
- distinctly different curricular structures, as published in the catalog.
- distinctly different student cohorts moving as a group through the program.

The proposed statement could be interpreted that only that the "degree" courses be on the matrix, with the pre-professional track handled as entry requirements.

Furthermore, we believe transfer students who receive advanced standing in an existing curricular structure need not be treated as yet another "track." (They undergo the review described in Part II, Section3 and enter one of the program's existing tracks.)

Schools should have freedom in how they address the SPC and should not feel compelled to have a "single learning experience" for each SPC. The requirement for an upper and a lower matrix is overly prescriptive: a well designed, single matrix could communicate how a single SPC is present across the curriculum, but coded as receiving particular accountability in a 1-3 courses.

Part Two: Section 2 – Curricular Framework

This is essentially unchanged from the 2004 Conditions, and is supported by ACSA.

Part Two: Section 4 – Public Information

II.4. 1 Statement on NAAB–Accredited Degrees

This is the section that requires specific language that clarifies the distinction between a pre-professional architecture program and a professional degree.

Likewise, ACSA recommends that those programs that offer post-professional degrees, in addition to their NAAB degree, provide clear language advising prospective students about the distinction between professional degrees and

post-professional degrees regarding licensure in most states and with regard to NCARB standards for reciprocity.

II.4.2 Access to NAAB Conditions and Procedures

NAAB Conditions and Procedures are publicly accessible on the NAAB web site, a link to which is required in II.4.3. Even though parents may be paying the bills, information they receive should not be a Condition of accreditation:

II.4. 3 Access to Career Development Information

Career development information is essential for students: it may be more productive to require this kind of information in their coursework, rather than website postings.

The website listings seem overly prescriptive. With so many requirements, the importance of career information related to internship seems diluted.

II.4.4 Publishing APRs and VTRs

This should be retitled "Public Access to APRs and VTRs"

II.4.5 ARE Pass Rates

II.4.5 ARE Pass Rates

Annually, the National Council of Architectural Registration Boards publishes pass rates for each section of the Architect Registration Examination by institution. This information is considered to be useful to parents and prospective students as part of their planning for higher/post-secondary education. Therefore, programs are required to make this information available to current and prospective students and their parents either by publishing the annual results or by linking their website to the results.

The APR must include a list of the URLs for the web pages on which the documents and resources described throughout Part II Section 4 are available. In the event, documents or resources are not available electronically, the program must document how they are stored and made available to students, faculty, staff, parents, and the general public.

ACSA recommends that this <u>not</u> be a Condition for accreditation. This information is publicly available on the NCARB web site.

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Requesting that a school link directly to this information implies that the ARE pass rates are related to the quality of education at that school, which is misleading.

ARE pass rates are not a good measure of the quality of education for 5 reasons:

1. The exam is intended to be practice-based, and the quality of one's internship is most important in passing most sections.
2. Individuals taking the exam graduated from the program years ago, and do not reflect the current curriculum of that program. (The average time to complete IDP is 4.8 years.)
3. Many individuals taking the exam attended two different NAAB programs, but are recorded as graduates of only one program.
4. There is a great deal of statistical variation on the data year-to-year, so its relevance to a particular school is questionable.
5. The school is self-reported by the test-taker, and not verified in any way.

In the past, ACSA has supported the publication of pass rates by school, but we do not support it as a requirement for schools to essentially provide students, given that the issue of passing the ARE is complex.