



Australian Institute of Architects

30 April 2017

Architects Accreditation Council of Australia  
Suite 3, Level 5  
75 Castlereagh Street  
SYDNEY NSW 2000

## STAKEHOLDER FEEDBACK – ANZAPAP REVIEW

The Australian Institute of Architects advocates on behalf of the architecture profession and the community to improve the quality and amenity of the built environment. The Western Australian Chapter Education Committee (WA CEC) takes this opportunity to support the review of the ANZAPAP and to provide comment.

As the review appears to propose significant changes to the current procedure, it is important that all stakeholders and the owners are provided with the full package of documents to review. That is not yet the case. We strongly recommend that the owners and stakeholders be given appropriate time before implementation for a full review, followed by time for amendments to the procedure before it is launched. We note that much of the detail of the new procedure will be contained in templates which have yet to be circulated for review. The WA CEC considers it essential that before implementation, stakeholders and the owners must have the opportunity to comment on those templates.

We are concerned that the consultation pack appears to focus its attention on particular questions without providing stakeholders with the complete revised ANZAPAP document for review. We understand that more information is available, but was not provided.

The intention of the proposed accreditation procedure to be able to respond to different program structures such as dual degrees, multiple BAPs, variable timelines and modes of delivery including on-line programs, is a positive attribute of the proposed procedure. We look forward to the opportunity to examine the proposed procedure.

The overall principles for guiding the development of a budget and the sharing of costs are supported. The consultation pack seems to focus on the financial aspects of the new procedure at the expense of providing adequate detail about the accreditation procedure itself.

The following feedback is in response to key questions set out in Section 5 of the Stakeholder Consultation Document.

No.	Question or issue for stakeholder comment.
1.	<i>Cost sharing and implementation arrangements are detailed in Section 4 - Outline of new financial model and cost sharing, inclusive of the Explanatory Notes included at Table 8.</i> <i>What are the key issues for stakeholders regarding:</i> <i>- Three-way cost sharing model?</i> <i>- Timing of implementation?</i>

	The principles articulated in the consultation pack appear reasonable, although it is not obvious that they will result in any cost savings to providers.
2.	<p><i>What are the key concerns or questions regarding: - The base-level accreditation fee described for a 'standard program assessment'? - The supplementary fee system described, with fees levied to Providers for specified activities / assessment requirements on a cost-recovery fee-for-service basis? - Fairness and equity for the relative size and complexity of Provider programs?</i></p> <p>Not knowing the detail of the costs for a university receiving an NVP currently, we are not in a position to comment in any detail, but the principles articulated in the consultation pack appear reasonable.</p>
3.	<p><i>Cost recovery and options for the sharing of costs between the ARBs as the Accrediting Authorities is described at Note 11 of the explanatory notes provided at Table 8 in Section 4 - Outline of new financial model and cost sharing. It is suggested that the ARBs consider the following three Options regarding how they may share their costs:</i></p> <ul style="list-style-type: none"> <li>- Option 1 – pro-rata based on the number of accredited programs per State / Territory</li> <li>- Option 2 – pro-rata based on the number of registered architects in each State / Territory</li> <li>- Option 3 – payment of a flag-fall fee by all ARBs, with the remaining cost shared pro-rata based on either the number of accredited programs or registered architects in each State / Territory. Are there any additional options that should be considered?</li> </ul> <p>This is a question for the Boards.</p>
4.	<p><i>Funding of Management Committee operations. All costs related to the new Management Committee (including travel and sitting fees) have been costed into the provisional financial estimates, as provided at Table 7 in Section 4 - Outline of new financial model and cost sharing. The 5 year financial estimates will continue to be reviewed and refined, with savings identified where possible.</i></p> <p><i>To reduce the overall program costs borne by Providers, should participating stakeholders (AIA, AACA, AASA, ADBED and the ARBs) be asked to fund their own representation in the Management Committee? This would entail stakeholder organisations paying the specified Sitting Fees, travel, accommodation and incidentals as required for participation by their representative/s.</i></p> <p>It is not clear how the Management Committee will work. How often will it meet? Face-to-face or by teleconference? What will its tasks be? We query the value and efficacy of ADBED's representation on the Management Committee. We agree that ADBED should be a stakeholder, but ADBED's members are frequently not architects and are not actively involved in accreditation.</p> <p>We believe that costs of the Management Committee operations, including sitting fees, travel etc., should be recovered through the ANZAPAP procedure, so that individual stakeholders are relieved of those logistical and cash-flow burdens.</p>
5.	<p><i>Representation in the Management Committee and managing conflicts of interest. The new Management Committee represents all stakeholders. The Committee's expanded responsibilities will replace the current Steering Committee (as described in Recommendation 5.0 from the Stage 1 Final Report). It is envisaged that the new Management Committee will include a single nominee from each of the following stakeholder organisations: AIA, AACA, AASA, ADBED and the ARBs.</i></p> <p><i>Representation in the Management Committee raises issues about managing conflict of interest.</i></p>

	<p><i>- In addition to managing the known conflicts of interest of Management Committee members via traditional committee processes (whereby members declare all conflicts of interests on an ongoing basis, and members with the conflict of interest abstain from or are excluded from the discussion), are there additional concerns or suggestions about how conflicts of interest within the Management Committee could be managed?</i></p> <p><i>- Should any other representative options be considered? If so, why?</i></p> <p>The existing ANZAPAP relies heavily on volunteers. Representatives on the Management Committee will potentially have a significant workload in addition to their professional workloads (whether in academia or the profession). There should perhaps be dual representatives from each of AIA, AACA, AASA and the Boards, to ensure that there is always a quorum. Perhaps one from each.</p> <p>It seems strange that the Management Committee might hear ‘appeals’ from providers. Surely that must be the role of the Boards. The ARPs will make recommendations, but there is no decision, i.e. nothing to appeal against, until the relevant Board makes its decision. The Management Committee would do well to stand aside from any role in appeals unless called upon by a Board to perhaps provide expert advice to an Appeal Tribunal or Board (subject to State legislation)</p>
6.	<p><i>The Benchmark Academic Pathway (BAP) is an important component of the assessment process, and limitations about the number of BAPs considered within a standard program assessment for accreditation is being incorporated.</i></p> <p><i>Is this definition feasible? Should any changes be considered? If so, why?</i></p> <p>The suggestion that 65% be the threshold proportion of a graduating cohort for identifying a single BAP is curious. It is conceivable that there might be 65% graduating from a primary BAP and concurrently another 20% graduating from a second BAP in a program, particularly where the provider has regular intakes from an/other institution/s. Perhaps there should be a decision that 20% is the threshold for any BAP.</p>
7.	<p><i>Professional Advice. In the revised ANZAPAP, the focus of assessment is on attainment of threshold competencies, as defined by the National Standard of Competency. Professional advice is no longer a distinct, separate section. Instead, it plays a significant role in the identification and formulation of action items in the Accreditation Review Panel (ARP) Report. Furthermore, an ARP, during a visit, will still be able to provide professional advice by means of discussion with a Provider.</i></p> <p><i>Should any additional opportunities for professional advice be incorporated into the ANZAPAP? If yes, how should these opportunities be incorporated and how should they be funded?</i></p> <p>It is not possible to offer professional advice on the basis of a review of pass work only. We have serious concerns about an ARP’s ability to recommend accreditation for a number of years into the future, based on a review of pass work only. Such a review cannot provide the panel with a context by which to gauge the sustainability of the program. We need to know how an ARP would determine whether the majority of students are attaining the necessary graduate attributes or benchmark learning outcomes.</p> <p>Furthermore, many pre-requisite units in a curriculum and indeed undergraduate degrees, set a minimum aggregate of 65% (a credit) for students to be allowed to progress. Reviews of pass level work will not demonstrate the adequacy of a program. We strongly recommend that the current assessment system be maintained – that ARPs review work from pass, credit and distinction (or high distinction) student work in all core units.</p>

In addition to our responses to the pre-determined questions we offer the following comments/questions:

- Will the report (school report) from the providers contain course outlines for prior review? Can that report then also provide an example of student work which meets the program's benchmark learning outlines?
- The school report from education providers addressing accreditation criteria, should arrive at the Secretariat a minimum of eight weeks in advance of the visit, not 12 as noted in Recommendation 8.A Table 10, to enable student work from the semester just completed to be included, as required.
- In ARP Report; Table 3 item 4, the report should not 'list any actions required to gain or maintain accreditation'. It should be up to the provider to decide how it rectifies a shortcoming.
- Stakeholders must be provided a reasonable opportunity to review the draft of the new procedure in its complete form prior to implementation. The consultation pack gives only a limited preview of aspects of the proposed procedure.
- We are concerned there may be a negative impact on institutions (providers) due to the uncertainty of the status of the procedures and the lack of opportunity to consult in the review. How can they be implemented within the proposed timeline without full review by stakeholders?
- We are concerned that all stakeholders affected by, and participating in, accreditation procedures are not being heard, acknowledged or receiving responses.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Dean Wood Raia', with a stylized, flowing script.

DEAN WOOD RAIA  
**CHAIR WA EDUCATION COMMITTEE**