ANZAPAP Review
Stakeholder Consultation Mar-Apr 2017
Summary of Stakeholder Submissions

A summary of the responses received from the following stakeholders (organisations and individuals) is contained at Section 1.

Exerts from each response have been summarized in the remainder of the document (Sections 2 to 23), as outlined in the Table of Contents below. Also note:

- Questions 1 to 7 were as posed in the Stakeholder Consultation. All stakeholder responses – including nil comments – are indicated against these sections.
- Other issues and themes identified in the responses are included in Sections 10 to 22.
- General commentary is summarized in the largest section, Section 23.

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Prepared by Michelle Breen, Secretariat to the ANZAPAP Review, 10May 2017

Section 1 – Listing of submissions received

	Stakeholder Response	Doc No	Document title
AIA bodies	AIA - NEC (2nd document is feedback from 2016)	1a	NEC Response to the ANZ APAP Development Group Consultation Pack_April 2017_FINAL
		1b	NEC response to ANZAPAP Review - Final (2016 Feedback)
	ACT Educ Chapter of AIA	2	ACT response ANZ APAP Review April 2017
	SA Educ Chapter AIA	3	170428 AIA SA CEC Response
	WA Educ Chapter of AIA	4	170530_ANZAPAP REVIEW_FINAL
	NSW Educ Chapter of AIA	5	AIA NSW EdComm Response to ANZAPAP April 2017
	EmAGN WA (Emerging Architects + Graduates Network WA), AIA	6	170430 ANZAPAP Review - Stakeholder Submission - WA Student.Graduate feedback
AACA / ARB bodies	Architects Board of WA	7	ANZ APAP Feedback from ABWA - 26 April 2017
	BOAQ	8	BOAQ Response to ANZAPAP Review-28.4.17
	NSW ARB	9	NSW ARB ANZAPAP Review Submission - FINAL
	ARBV	10	COMMENTS ON THE 2017 ANZAPAP_ARBV
	APBSA	11	Feedback to Dev Grp APBSA 300417
	NAP	12	NAP response to the ANZAPAP consultation
Providers	University of SA	13	Joanne Cys_Univ of SA_Feedback
	University of Canberra	14	University of Canberra Response to ANZ APAP
	UNSW	15	ANZAPAP Review 2017 Stakeholder consultation_UNSW Response
	Univ of Sydney	16	ANZAPAP REVIEW USYD COMMENTS APRIL 2017
Other bodies and individuals	ANZ APAP Steering Committee	17	SC_Stakeholder_Feedback_28042017
	AASA (2nd document is feedback from 2016)	18a	AASA Feedback on ANZAPAP Review_30Apr2017
		18b	AASA Feedback on ANZ APAP Review_May_27_2016
	ADBED	19	ADBED Feedback
	ACA	20	ACA Submission ANZAPAP Review 2017
	NZRAB	21	NZRAB ANZAPAP Review Submission 27 April 2017
	Bruce Callow (WA)	22	ANZAPAP Review - B Callow 'Stakeholder' Submission 28Apr17
	Ian Hamilton (QLD)	23	Ian Hamilton Feedback

Note that some submissions (AIA NEC and AASA) have referred to and included their submission documents from the Stage 1 of the review completed in 2016. Details from the 2016 feedback documents (or the 2016 documents themselves) from these organisations have not been included in this summary document.

Section 2 – Cost sharing and implementation arrangements

Question 1. Cost sharing and implementation arrangements are detailed in Section 4 (of the Stakeholder Consultation Pack) - Outline of new financial model and cost sharing, inclusive of the Explanatory Notes included at Table 8 (of the Stakeholder Consultation Pack). What are the key issues for stakeholders regarding:
- Three-way cost sharing model?
- Timing of implementation?

AIA NEC

See general comment on financial matters at Section 6.

AIA ACT Chapter Education Committee

Endorses the AIA position detailed in their letter of 18 April 2017.

Nil additional comment.

AIA SA Chapter Education Committee

This appears to be a good way of moving forward but the costs appear to have significantly increased for Universities. As a result this may in fact result in an increased risk of a currently accredited University exiting the accreditation process.

The timetable identified appears overly fast tracked given the significant changes to the current ANZAPAP, the number of unresolved pro-forma documents reported, and the unresolved detailed terms of reference and work load for the new Management Committee.

The 3 way cost sharing model proposes an increased cost to all providers, and argues that reduced length of visit + number of panelists to host will offset this increase, as will the un-mandated physical exhibition of work. This effectively 'white ants' the likelihood of any exhibition being mounted, something we argued for strongly in our previous submission.

AIA WA Chapter Education Committee

The principles articulated in the consultation pack appear reasonable, although it is not obvious that they will result in any cost savings to providers.

AIA NSW Chapter Education Committee

Three-way cost sharing model
- Without sighting the ANZAPAP document, there is insufficient information to effectively test and critique the proposed funding model against the proposed process
- The increased cost to Education Providers in return for a significantly reduced procedure, potentially lacking in rigour and constructive critique, does not appear to be value for money for Education Providers, who see benefits in the peer review and conversation present in the current accreditation process.
- Considering the AACA is the national voice for the ARBs, there appears to be additional costs to the Architects Registration Boards (ARBs) that may in turn impact their influence over the process.
- CI regarding how the salary allowance for the Secretariat was determined.

Timing of implementation: The program outlined in Table 1 appears to align the review process with the financial year so that the revised procedure can come into effect July 2017. This proposed program nominates feedback from co-owners as less than one month. It is not nearly long enough for the preparation of a thoughtful, considered response. Further, the program does not allow for stakeholder feedback on the actual ANZAPAP document.

AIA EmAGN WA
Nil comment.

Architects Board of WA
The three-way cost sharing model provides for an equal split of all costs of accreditation between the:
- Program Providers;
- Australian Registration Boards (ARB'S); and
- Owners of the ANZ APAP (being the AIA and the AACA).

The Board submits that this model penalises the ARB's who will effectively end up paying twice for the accreditation process due to the fact that they own, and fund, the AACA. So, under the three-way cost sharing model outlined above, the ARB's would pay a third of the costs as the accrediting authorities but would then also pay a further share as the owners of one of the "Owners" of the ANZ APAP.

The Board also submits that the Providers are the stakeholders which gain the most benefit from the accreditation process so they should therefore pay a larger proportion of the costs. The costs of accreditation are simply the costs of doing business which Providers would have to factor into their business models.

The Board therefore proposes that a survey be conducted across the sector to determine the costing models used for other professions. Alternatively, the Board submits that the cost-sharing model should be amended so that each stakeholder pays the following proportion of costs:
- Providers – 50%;
- ARB's – 16.6%
- AACA – 16.6%; and
- AIA – 16.6%.

Ideally, any new costing model should be implemented in time for the ARB's to be able to budget for the costs accordingly. The Board's budget is usually compiled, and signed off on, in June of each year to enable its implementation in the new financial year. With the recommendations of the ANZ APAP review not due for implementation until July 2017, the Board would not be able to budget for this implementation in the 2017/2018 financial year without some certainty around the costs involved.

BOAQ
Our purpose in this feedback is to make cost sharing both fair and simple. The professionalization of the accreditation process is a worthy and important aim and we should expect that the cost of accreditation may increase as a result.

The primary beneficiaries of the ANZAPAP are the architecture schools/providers who rely on accreditation to be able to offer their courses, and the state/territory boards which have the legislative

responsibility for approving the courses which can lead to registration in their jurisdictions, The cost should be shared equally, or in another agreed split, between these two stakeholder groups.

While the contribution of the AIA towards assisting in the assessment of quality of the courses is welcomed and fundamentally important to the maintenance of standards and quality, the AIA should not be asked to contribute financially towards the ANZAPAP as they are not a direct stakeholder in accreditation.

Because AACA is comprised of the Boards, and partially funded per capita of architects by the Boards, it is not effective or efficient to separate the Boards as a third stakeholder in accreditation. If it is not possible for the AACA's contribution to the cost of accreditation to be made from its existing revenues, each of the state/territory boards could be levied an additional amount per registered architect added on to the existing annual funding arrangement (providing the number of registered architects in each jurisdiction is reasonably proportional to the number of courses offered in the jurisdiction). If this is not the case then an additional levy/capita of architects based on the number of programs to be assessed in the jurisdiction should be calculated

NSW ARB
We would like to understand greater context around the changes from the old to new funding model, and in particular note that change from a 1/3 split between providers, AIA and AACA, to a new model which is 1/3 providers ARB and then 1/6 AACA and AIA

The significant adjustment is of course the appearance of a formal and significant contribution (1/3) from the ARBs.

We would like to understand further:
- The motivations for this change
- The governance procedures and obligations that might be expected to flow from this change
- Current views around the methodology uses between the ARBs to apportion each state's contribution (table 8, item 11) [*This comment is included in both Sections 2 and 4*]

ARBV
Nil comment.

APBSA
The 3 way spit is a reasonable way to split the costs involved in ANZAPAP. However with the recent withdrawal of joint owner AIA from the Development Group, the possibility exists that AIA will withdraw completely from the process, along with their joint ownership of ANZAPAP. If so, the full contribution from the Owners will fall to AACA – ie they will be required to contribute $58,570 rather than a half share of $29,285.AACA NAP

AACA NAP
The cost of the procedure should be born by the parties that benefit from the recommendations of the Accreditation Panels - primarily the providers who must maintain accreditation in order that their programs are approved for the purpose of graduates' entry to the Architectural Practice Examination, and the Architect Registration Boards who have the legislative responsibility to accredit programs under their

respective Architects Acts. The AIA utilises the accreditation status of an applicant's application for membership of the Institute so also benefits from the process.

Schools report that the cost of mounting a National Visiting Panel currently cost between $30,000 (small program) to approximately $80,000(large program). A more effective and streamlined procedure will provide cost savings for schools that will more than compensate for the proposed increase in the annual fee currently levied on the provider.

The model proposed ignores the licence fee paid by New Zealand. The licence fee paid by New Zealand should be re-negotiated based upon the number of architects in New Zealand in order to more accurately reflect the benefit to the New Zealand Architect Registration Board.

Revised cost sharing arrangements should commence from beginning of the 2017-8 financial year.

Univ of SA
The benefits outlined in Table 8 are described as quantifiable, financial benefits for two of the three beneficiaries, the Providers and the ARBs, yet the benefits for the Owners (AIA and AACA) are not equally described. Instead, there is vague reference to "the Profession" having membership and workforce benefits. This is inconsistent and should be presented as quantifiable benefits for the Owners (AACA and AIA), eg. described as operational efficiencies and membership revenue for example.

No issues re timing of the implementation.

Univ of Canberra
Endorses the AASA response.

UNSW
Endorses the AIA NSW Education Chapter response.

Univ of Sydney
No comment in principle to cost sharing; though some concern at the total anticipated annual financial commitment expected of a Provider beyond the $3254/annum for a Standard Program Assessment.

Contribution to overhead costs required from each Provider appears to be additional to the base---level accreditation fee, but no detail is provided to enable this to be calculated.

Transitional arrangements (both logistical and financial) for the first year of implementation (July 2017) are not clear --- eg. say where a Provider is not due for a Standard Program Assessment for accreditation (but might be due for an Interim Review Panel visit). What are the logistical and financial impacts on such a Provider.

ANZAPAP Steering Committee
The SC is concerned that State and Territory Boards may consider the new cost sharing arrangements as inequitable as it may be interpreted that the Boards contribute twice through payments to the AACA and as separate entities.

The budget for 2018 is reliant on billing stakeholder groups in the new financial year [July 2017]. Has this detail been made sufficiently clear to stakeholder groups? How does this take into account the current billing cycle which occurs at six monthly intervals at the end of the calendar and financial year, with invoicing due in June 2017?

AASA

Nil comment.

ADBED

Nil comment.

ACA

Nil comment.

NZRAB

NZRAB has no comment – as a licensee NZRAB would develop its own cost sharing arrangements for reviews undertaken for New Zealand programmes.

Timing of implementation? Proposed implementation timings are acceptable, however the NZRAB notes that the proposed changes are significant and both panel chairs and panel members will require comprehensive information on the changes and how they will impact on visits, well in advance on those visits.

Bruce Callow (WA)

Nil comment.

Ian Hamilton (QLD)

Nil comment.

Section 3 – Fee arrangements for Providers

Question 2. Fee arrangements for Providers are described at Notes 12 to 19, with fairness and equity issues described at Notes 20 to 24, of the Explanatory Notes contained at Table 8 of Section 4 - Outline of new financial model and cost sharing. (See the Stakeholder Consultation Pack for Notes)

What are the key concerns or questions regarding:
1. The base-level accreditation fee described for a 'standard program assessment'?
2. The supplementary fee system described, with fees levied to Providers for specified activities / assessment requirements on a cost-recovery fee-for-service basis?
3. Fairness and equity for the relative size and complexity of Provider programs?

AIA NEC
See general comment on financial matters at Section 6.

AIA ACT Chapter Education Committee
Endorses the AIA position detailed in their letter of 18 April 2017.
Nil additional comment.

AIA SA Chapter Education Committee
1. Information and details on the current fee arrangements would be required to provide any valuable feedback on the new base level accreditation fee. Information on how the new base level accreditation fee was identified would also be required as previous review comments from the AIA requested financial modelling from a suitably qualified financial consultant. As noted above, the base level accreditation fees appear to increase significantly and this may result in an increased risk of a currently accredited University exiting the accreditation process.

2. A supplementary fee system would be required to recover costs for specific activities such as 3 year accreditation rather than 5. However more detail on the development of the cost plan would be required to comment further.

3. Universities with higher student numbers would not necessarily have more complex programs. If a higher fee is envisaged for these issues then the two items noted should be treated independently. Some of the statements provided directly contradict each other, IE: differing student numbers have not been taken into consideration, whilst another statement notes that this would be envisaged. Travel costs for panel members is noted as not being currently incorporated. These costs should be explored and identified, and should include allowances for panel members travelling from distant jurisdictions, including some allowance for travel from New Zealand.

The increase of ~ 40% PA for the 'base-level accreditation' does not constitute good value for money to a Provider considering the expected reduction in detailed benchmarking feedback, professional advice or pedagogical and networking advancement that was embedded in the previous system. It is a concern that this increase in cost may catalyze some Providers to exclude themselves from the process, to the detriment of the authority of the whole procedure. Furthermore the increased costs for 'non-standard assessments could discourage educational and professional initiatives.

AIA WA Chapter Education Committee

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.

AIA NSW Chapter Education Committee

1. The review of the ANZAPAP was founded on an idea of efficiencies and streamlining of the process. The committee notes the substantial increase in fees to be paid by education providers.

2. The processes required for the introduction of the supplementary fee is not clear. The role of the supplementary accreditation needs to be defined to better assess potential unfairness and inequalities.

3. Further information is needed on the process required for larger Education Providers to pay additional fees over-and-above the base-level-accreditation to assess the fairness and equity.

AIA EmAGN WA

Nil comment.

Architects Board of WA

The Board does not have any specific feedback regarding this question. However, as a general comment, the Board repeats its comment from above that the Providers are the stakeholders which gain the most benefit from the accreditation process. If their programs were not accredited they would not be able to attract students or funding and would not be able to conduct their businesses effectively. The costs of accreditation are simply part of the basic costs of doing business which Providers would have to factor into their business models.

The Board further comments that the costs of accreditation for other professions, such as medicine, far exceed those borne by the architectural Providers, either currently or under the proposed cost sharing model.

BOAQ

Generally supported. However, the priority focus should be on ensuring the quality of assessors is maintained regardless of geographical implications for costs of travel etc.

NSW ARB

Nil comment.

ARBV

Nil comment.

APBSA

The fee arrangements appear to be fair and equitable for all providers. It limits the number of streams assessable by the panel under the basic fee, and requires additional payment for the review of additional streams. The quantum of cost charged for the review of additional streams may be quite similar to the basic fee (e.g. 3-4 streams = double the basic fee), as there is a significant amount of extra work to be undertaken.

Consideration might also be given to timeframes to assess the programme work of additional streams, as the programme would also need to be extended.

AACA NAP

Generally supported. Quality of assessment panels outweigh any cost issues.

Univ of SA

Consider publishing an annual schedule of standard fees for supplementary activities/services.
Regarding Fairness and equity for the relative size and complexity of Provider programs? Further consultation will probably be needed to be undertaken to determine satisfactory EFTSL 'bands' for program size, and possibly agree upon some program 'characteristics' that indicate a complex' program.

Univ of Canberra

Endorses the AASA response.

UNSW

Endorses the AIA NSW Education Chapter response.

Univ of Sydney

The base-level annual fee of $3250 represents an effective cost to each Provider of $16,270 for a Standard Program Assessment. This fee represents an increase of around 40% from the previous arrangement, but no rationale for the increase is outlined. In fact, the scope has been reduced. The fee appears to be inclusive of costs external to the Provider - ie. associated with the actual site visit, comprising hosting of 5 panel members, travel, accommodation, per diem etc.; but exclusive of internal Provider costs- such as venue, staffing, documentation and the like. Is this correct?

The grounds for the need of a further site visit within the period of accreditation (Table 8. Item 17a, page 19) are not clear, nor are the financial implications of such a visit to a Provider.

The circumstances triggering supplementary/additional fees, and the basis on which such fees are to be calculated (Table 8. Item 24, page 20), are not made explicit - eg. what constitutes i) a
`larger Provider'; ii) `higher student numbers' and iii) a `more complex program'?

ANZAPAP Steering Committee

The SC agrees with these provisions in principle. Given the rate at which existing programs are currently introducing streams/ dual degrees, a comparison of costing of a 'standard program assessment' versus a complex program assessment would be useful. The *Consultation Document* does not demonstrate the consequences of such variations on the budget.

AASA

Nil comment.

ADBED

Nil comment.

ACA

Whilst Providers will now be asked to contribute to the overhead costs, the new model has attempted to reduce the costs borne by Providers via the following mechanisms:

a. Removal of the Interim Review Panel visits and associated costs
b. The accreditation visit to each Provider decreases in length from 3 to 2 days to reduce the cost of hosting the visit and direct costs of the panel.
c. The size of the Accreditation Review Panel (ARP), reduced from 9 to 5 members to reduce the costs associated with travel, accommodation and sitting fees.
d. Removal of the requirement for the Student Exhibition as part of the Accreditation Visit.
e. Providers are only required to present student work at the threshold level in a digital portfolio. It is up to the Provider to decide if they want to schedule a physical exhibition of student works in parallel with the ARP visit.

Our concerns are that many of the changes are designed to reduce costs rather than provide an assessment process that supports superior student outcomes.

NZRAB

NZRAB has no comment – as a licensee NZRAB would develop its own cost sharing arrangements for reviews undertaken for New Zealand programmes.

Bruce Callow (WA)

Nil comment.

Ian Hamilton (QLD)

Nil comment.

Section 4 – Cost recovery and options for the sharing of costs between the ARBs

> **Question 3.** 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 (See the Stakeholder Consultation Pack for details). It is suggested that the ARBs consider the following three Options regarding how they may share their costs:
> - Option 1 – pro-rata based on the number of accredited programs per State / Territory
> - Option 2 – pro-rata based on the number of registered architects in each State / Territory
> - 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?

AIA NEC
See general comment on financial matters at Section 6.

AIA ACT Chapter Education Committee
Endorses the AIA position detailed in their letter of 18 April 2017.
Nil additional comment.

AIA SA Chapter Education Committee
At face value all 3 options identified would appear to have both Pro's and Con's. Further information and feedback from stakeholders would be required to properly review and comment on these options.

However, a fee based on the number of registered architects may appear to be more equitable than the number of accredited programs (IE: the Northern Territory does not have an accredited program but they do have registered architects. As a result the Northern Territory should still contribute to the cost sharing model)

AIA WA Chapter Education Committee
This is a question for the Boards.

AIA NSW Chapter Education Committee
The NSW Education Committee is of the belief that ARB funding is to be determined by the ARBs, however to respond to the question, pro-rata funding based on the number of accredited programs per State / Territory allows for the cost of accreditation to match the number of education providers.

AIA EmAGN WA
Nil comment.

Architects Board of WA
The Board firmly believes that proposed "Option 2" is the only fair and equitable method of cost division between the ARB's.

The only source of income for the ARB's is the fees paid by registrants. It follows that if a board's income is based on the number of registrants it has, then the costs that it bears should also be based on the number of registrants it has.

A flag-fall fee would be manifestly unfair for ARB's with a smaller number of registrants who would be paying a much larger proportion of their income for the accreditation process.

Similarly, basing the cost division on the number of accredited programs in a jurisdiction is inequitable as the number of programs bears no direct relation to the number of architects registered in each jurisdiction and therefore no relation to the income of that ARB who may end up paying a larger proportion of their income for the accreditation function.

Furthermore, if on on-line course were to be accredited (such as that proposed by Curtin University in WA), the jurisdiction where that program was based would bear additional costs even though that program could be completed by students in any location who would not necessarily register in that jurisdiction.

BOAQ
The primary beneficiaries of the ANZAPAP are the architecture schools/providers who rely on accreditation to be able to offer their courses, and the state/territory boards which have the legislative responsibility for approving the courses which can lead to registration in their jurisdictions, the cost should be shared equally, or in another agreed split, between these two stakeholder groups.

While the contribution of the AIA towards assisting in the assessment of quality of the courses is welcomed and fundamentally important to the maintenance of standards and quality, the AIA should not be asked to contribute financially towards the ANZAPAP.

Because AACA is comprised of the Boards, and partially funded per capita of architects by the Boards, it is not effective or efficient to separate the Boards as a third stakeholder in accreditation. If it is not possible for the AACA's contribution to the cost of accreditation to be made from its existing revenues, each of the state/territory boards could be levied an additional amount per registered architect added on to the existing annual funding arrangement (providing the number of registered architects in each jurisdiction is reasonably proportional to the number of courses offered in the jurisdiction). If this is not the case then an additional levy/capita of architects based on the number of programs to be assessed in the jurisdiction should be calculated.

NSW ARB
Current views around the methodology uses between the ARBs to apportion each state's contribution (table 8, item 11) [This comment is included in both Sections 2 and 4]

ARBV
Nil comment.

APBSA
The funding model proposes the contribution from all Boards is $58,570 pa. This could be split 3 ways (as above). Theoretically, each university program will cost the same to review, assess and accredit so either option 1, or option 3, would appear the most equitable way to split the contribution across all registration

Boards. The size of the school (ie student numbers) should not make a difference as the programme still requires the same assessment process.

The difficulty with using a formula based on the pro rata number of registered architects in each jurisdiction (ie option 2) is that this changes on a daily basis (obviously the number would have to be taken from the Registers at a particular point in time each year). Also, architects are highly mobile and many architects are registered in multiple jurisdictions at any given time.

On balance, the APBSA prefers the first option (ie based on the number of accredited programs in each jurisdiction). Where there is no accredited programme in a jurisdiction, the Board is not required to contribute.

AACA NAP
ARBs will provide their comment on this issue, however, given the mobility of students and the national focus of the accreditation procedure Option 2 seems be the most appropriate option.

Univ of SA
No, but as this whole system is driven by and in support of registration, option 2 is the most appropriate option. In time, further data should be collected to provide information on the number of graduates of accredited architecture programs that go on to become registered architects, including for example, examination success rates by program. This may have an impact on the process and costs for Providers.

Univ of Canberra
Endorses the AASA response.

UNSW
Endorses the AIA NSW Education Chapter response.

Univ of Sydney
Nil comment.

ANZAPAP Steering Committee
The SC believes this is a question for the ARSs.

AASA
Nil comment.

ADBED
Nil comment.

ACA
Nil comment.

NZRAB
NZRAB has no comment on Accrediting Authorities cost sharing arrangements – as a licensee NZRAB would develop its own cost sharing arrangements for reviews undertaken for New Zealand programmes. We however note that the financial modelling has considered that there will be some costs to the process

resulting from a licensee relationship with NZ, presumably anticipating that NZ would wish to continue as a licensee?

As a separate work stream, the Owners need to consider what their obligations are as a licensor of the process, and what obligations are expected of a licensee. Those obligations need to ensure that the quality of implementation by licensees is appropriate and maintains the integrity of the process.

Bruce Callow (WA)
Nil comment.

Ian Hamilton (QLD)
Nil comment.

Section 5 – Funding of Management Committee operations

> **Question 4 .** 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. (See the Stakeholder Consultation Pack for details)
>
> 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.

AIA NEC

See general comment on financial matters at Section 6.

AIA ACT Chapter Education Committee

Endorses the AIA position detailed in their letter of 18 April 2017.
Nil additional comment.

AIA SA Chapter Education Committee

Much more information regarding the Management Committee is required to provide a proper review and comment on issues associated with this new Committee. Significant information is currently lacking regarding Terms of Reference, Committee composition and terms, quorum information, and detailed information on proposed workload and estimated times the committee has to undertake the vast number of tasks currently identified.

The suggestion to recoup costs from each participating stakeholder to fund their own representatives is worth pursuing.

AIA WA Chapter Education Committee

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.

AIA NSW Chapter Education Committee

The AIA, AACA and ARB financially contribute to the accreditation process and have a seat on the Management Committee. Education Providers financially contribute to the accreditation process and indirectly have a seat on the Management Committee through the AASA and the ADBED. As such, the NSW Education Committee do not see a benefit in asking the AASA and the ADBED to fund their own representation on the Management Committee as this may be funded by the Education Providers.

AIA EmAGN WA

Nil comment.

Architects Board of WA

The Board does not have any specific feedback with relation to the question regarding costings for the Management Committee, except to comment that the figures estimated for the projected costs for the ANZ APAP Secretariat Staff (as set out in Table 7 on page 16 of the Consultation Pack) appear to be quite low. The Board considers it very important, for the purposes of budgeting, that the estimated fees be as accurate as possible.

However, the Board does not believe that participating stakeholders should be asked to fund their own representation in the Management Committee in the interests of reducing the overall costs to the Providers. As mentioned above, the Board considers that the Providers are the stakeholders gaining the most from the accreditation process and that they should therefore be responsible for bearing the bulk of the costs.

The Board submits that the costs of participation in the Management Committee should simply be included as part of the costs to be shared according the model outlined in Question 1, above.

BOAQ

No. Management Group stakeholders should not be asked to fund their own representation in the Management Committee.

Given that the Management Committee is an essential feature of the ANZAPAP, the funding model for the ANZAPAP should be fully costed to include all costs associated with the Management Committee.

NSW ARB

Nil comment.

ARBV

Nil comment.

APBSA

Requiring each stakeholder to fund their own representation on the Management Committee will encourage the stakeholder to be accountable for their representative, and vice versa; it will also reduce the Secretariat's overheads. It has not been discussed at the APBSA but is a realistic way to minimize cost. However, this could result in inequities across the Management Committee, with some members being supported at a greater or lesser extent than other members. The Management Committee could provide guidelines to Stakeholders on the level of support expected; and where support provided for a representative is at a lower level this should be addressed between the individual and the body they are representing.

AACA NAP

The NAP recommends that the ANZAPAP provides explicit advice on the role of the Secretariat and the role of the Management Group.

As the Management Committee is an essential feature of the ANZAPAP, the funding model for the ANZAPAP should be fully costed to include all costs associated with the Management Committee.

Univ of SA

No, this would complicate any matters relating to performance or conflicts of interest. It's preferable to keep funding at arm's length from the stakeholder organisation.

Univ of Canberra

Endorses the AASA response.

UNSW

Endorses the AIA NSW Education Chapter response.

Univ of Sydney

Nil comment.

ANZAPAP Steering Committee

Nil comment.

AASA

Nil comment.

ADBED

Nil comment.

ACA

Nil comment.

NZRAB

NZRAB has no comment on the funding of the Management Committee, however does have an interest in understanding proposed licence funding arrangements, licensor and licensee obligations and relationship to both the Owners and the Management Committee

Bruce Callow (WA)

Nil comment.

Ian Hamilton (QLD)

Nil comment.

Section 6 – General comments on costing model and financial estimates

Summary comments not specific to Questions 1 to 3 are included here.

AIA NEC

The NEC notes that without the draft procedure or the supporting documentation there is insufficient information to test or make meaningful comment regarding the proposed financial model other than to note that the intention to provide a cost recovery model funded through
equitable contribution by stakeholders is generally supported.

The NEC queries the focus on minimising costs, which appears to be a priority of the Review
over delivery of a robust and comprehensive procedure. We also note that while cost reduction is frequently referred to in the Consultation Pack the revised cost model appears to deliver a reduced procedure, potentially at increased overall cost to architecture programs and architect registration boards (ARBs).

The NEC notes that the minimisation of resources – time and personnel – in relation to the
ARP visits, plus the reduction in Secretariat support, are being achieved through significant
increases in the commitment expected from panel members both before and after the ARP
visits. The same would appear to apply to members of the Management Committee. This is
a risk to stakeholders as it may reduce participation in accreditation on the basis that it is too onerous.

The relative time commitment and cost of the current IRP system compared with the proposed annual reporting system requires testing. In addition, this change should be reviewed with regard to the effectiveness of each process to monitor a program's progress against Action Items.

AIA ACT Chapter Education Committee

Endorses the AIA position detailed in their letter of 18 April 2017

To assess the proposed cost recovery suggestion, CEC requests that stakeholders are provided with modelling for impacts on architecture programs, the Institute, and AACA.

AIA SA Chapter Education Committee

◦ Financial Model
- Evidence of existing cost structures should be provided.
- Annual salary for secretariat appears low
- Appears to show significant cost reductions for NVP's. What are these assumptions?
- What are the current costs for NVP's and what is a detailed description of the work panel members are now proposed to undertake prior to the visit.

◦ Panel member costs
- What is the make up of the 5, 6 or 9 person panel?
- If owners and stakeholders pay for panel travel, accommodation and honorarium then how many panel members will each stakeholder fund? Will this allow the numbers of panel members to be increased to ensure equitable cost distribution?

AIA WA Chapter Education Committee

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.

ANZAPAP Steering Committee

The SC agrees with overall principles for guiding the development of a budget but is disappointed with the level of detail included. The SC considers is it essential that before implementation of the new process stakeholders have the opportunity to comment on the development of budget principles.

Section 7 – Representation in the Management Committee and managing conflicts of interest

Question 5. 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. (See the Stakeholder Consultation Pack for details)

Representation in the Management Committee raises issues about managing conflict of interest.
- 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?
- Should any other representative options be considered? If so, why?

AIA NEC

The proposed Terms of Reference for the Management Committee, should include protocols for addressing conflicts of interest, and be provided to stakeholders for review, to gain a full understanding of the proposal.

AIA ACT Chapter Education Committee

Endorses the AIA position detailed in their letter of 18 April 2017
Nil additional comment.

AIA SA Chapter Education Committee

Insufficient information regarding the Management Committee has been provided to make a proper review and comment on issues associated with the new Committee. Will there be 8 board representatives (6 state & 2 territories) or just one? If one then how does the committee represent national issues? If 8 then are the boards over represented on the Committee? A detailed proposal for a Management Committee structure and function should be developed through meaningful consultation with all stakeholders. A fee model which explores stakeholders funding their representatives has merit and should be explored.

The Committee seems lean to the point of fragile, considering the likelihood of conflicts of interest and that it represents [at present] 18 Providers. What is the quorum size, and what are the arrangements for proxies or stand-ins?

Management Committee
- Detailed terms of reference need to be developed and reviewed now, not later, and prior to transition.
- Detailed agenda needs to be developed as the updated documents identify large amounts of work to do with only 4 meetings (3 x face to face), prior to transition.

- The workload of the new committee appears far larger than what might be reasonably achievable. Ie: Reviews 18 annual reports, Establishes NVP composition for each year, Develops and implements a training program (huge job), Manages an appeal process? Manages the Standing Panel? Etc

AIA WA Chapter Education Committee

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.

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.

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)

AIA NSW Chapter Education Committee

The NSW Education Committee note that Management Committee members who abstain from or are excluded from a discussion due to a conflict of interest can impact on the diversity of discussion within the group. Perhaps where conflict of interest may impact the discussion, this conflict is clearly stated prior to a comment being made so that inherent biases are transparent and understood by all. This approach may not be suitable in all cases.

The composition of the Management Committee does not evenly reflect the key stakeholders of the ANZAPAP. It is understood that the AACA is 'the national voice' for the Architect Registration Boards (ARBs). Including both the ARBs and the AACA on the Management Committee would suggest that the ARBs may be over-represented on the Management Committee. We note that the presence of both the ARB and AACA is important, however the potential double-up of opinion needs to be managed.

AIA EmAGN WA

Nil comment.

Architects Board of WA

The ANZ APAP review envisages that the new Management Committee "will include a single nominee from each of the following stakeholder organisations: AIA, AACA, AASA, ADBED and the ARB's."

It is unclear from the above statement whether the ARB's will, as a group, have one representative on the Management Committee or whether each of the eight ARB's will have their own representative (if they so desire).

The Board submits that each ARB should have its own representative on the Management Committee as the ARB's are each jurisdiction has its own unique set of circumstances including different legislative requirements.

BOAQ

Conflict of Interest – It is expected that standard best practice, as outlined in any advice provided by Commonwealth or State law offices, should be adhered to by the Management Committee.

Representation - It is essential that the regulators/owners of the ANZAPAP have at least equal representation on the Management Committee.

As it stands, there are two AACA/Board representatives (regulators/owners), two AASA/ADBED representatives (providers/academic voices), and one independent AIA member whose role might be cast as offering professional input. This structure would give the AIA member significant power in decision-making across all accreditation matters.

We recommend the inclusion of an additional Board/AACA representative on the Management Committee to ensure the regulators' legislated governance responsibilities can be effectively prosecuted.

NSW ARB

Nil comment.

ARBV

The roles of AASA and ADBED in the Management Committee of the ANZAPAP processes may not be appropriate given their conflicted position which might result in streamlined processes in preference to rigorous processes. One person could represent both AASA and ADBED given the overlap of membership. Each registration board should be represented.

APBSA

Managing conflicts of interest should be given a very high priority by stakeholders. ANZAPAP must be a robust process, and to maintain the integrity of the process, the way conflicts of interest are managed must be transparent and accountable. Rather than rely on members to declare any conflicts of interest on an ongoing basis, a regularly updated written register of members' conflicts of interest could be the basis for managing them. Also, the Development Group could consider including CONFIDENTIALITY PROVISIONS here, with each member of the Management Committee signing a confidentiality agreement at the commencement of their term on the committee.

AACA NAP

The title 'Management Group " should be re-considered in the fleshing out of the respective roles of the secretariat and management function and the role of the Group of experts charged with the responsibility with ensuring that policies and procedures of the ANZAPA focuses on concerns regarding the development and quality of architecture without stifling innovation.

All stakeholder Groups may have a conflict of interest. The NAP is satisfied that the conventional measures to deal with conflicts of interest will be implemented and declared as appropriate.

Given the degree of control that the Management Committee has over the entire ANZ APAP, protocols need to be in place to avoid the perception of conflict of interest, particularly in relation to appeals.

The nominees from each of the stakeholder groups are expected to meet Members' eligibility criteria and be able to contribute effectively to the work of the Management Group. Nominees from all stakeholders should be academics and/or practitioners with current experience in architectural education and/or practice.

This is particularly important in reference to the membership of ADBED. ADBED is a structure driven by management imperatives within the education sector, so the relationship of architecture to this group may change over time. The terms of reference should acknowledge this.

The eligibility criteria for members of the Management Group should explicitly require Members to abide by a Code of Conduct which requires conflicts be declared and managed appropriately.

While Members are nominated by respective stakeholders the terms of reference should require that while carrying out their duties on the Management Group members act in the best interests of the aims and objectives of the ANZAPAP.

Univ of SA
A 'register' that describes (anonymised) 'types' of conflicts of interest that have arisen could be maintained by the Secretariat and made public to all stakeholders. This would be a useful reference for the stakeholder organisations to consult to at the time of calling and considering nominations for membership of the Management Committee.

Re Should any other representative be considered? No , this is a Management Committee, it's more a matter of attracting quality and appropriate (see point above) nominations from the respective stakeholder organisations. What is the process for calling for nominations? What are the criteria? This might also need a review.

Univ of Canberra
Endorses the AASA response.

UNSW
Endorses the AIA NSW Education Chapter response.

Additional comment: As currently proposed, we have concerns that there is inadequate representation of experienced academics teaching within programs on the Management Committee. Although there is representation through the nominees from AASA and ADBED, in practice ADBED representatives could come from a range of disciplines.

Univ of Sydney
Nil comment.

ANZAPAP Steering Committee
The SC questions the involvement of a member of ADBED in a Management Committee. It accepts that ADBED is a stakeholder and is such, should be acknowledged and receive annual reports, review

documents etc. ADBED's engagement with accreditation processes is at arms' length and in most instances members of ADBED are from disciplines other than architecture. Given the scope of the role envisaged for the Management Committee, the inclusion of a representative of ADBED may skew both the evolution of accreditation policy and procedure _and_ architectural education going forward.

The SC is concerned about the Management Committee's [MC] proposed role in an appeal process [Recommendation 9.0, Table 10]. The SC questions the validity of an appeals process.

The ARP's Report is a recommendation to an ARB. An appeals process is an appeal against a recommendation not an outcome. The involvement of the Management Committee in this process is tantamount to meddling in the accreditation process and will undermine the authority of an ARP and its chair and is questionable in relation to the various State Acts.

Recommendation 8.1 Table 10 lists outcomes of an ARP Report as accreditation, non accreditation or suspension of accreditation. The ARB as the accrediting authority should decide what happens next.

AASA
Nil comment.

ADBED
Nil comment.

ACA
Nil comment.

NZRAB
Again NZRAB would want to understand the proposed relationship of licensee(s) to the Management Committee. A close relationship would be necessary to ensure the consistency of the application of the process across licenced jurisdictions, and to ensure that issues, innovations, inconsistencies and learnings across the whole system are communicated and are acted on as required.

Bruce Callow (WA)
Nil comment.

Ian Hamilton (QLD)
Nil comment.

Section 8 – The Benchmark Academic Pathway

In addition to responses on the revised draft BAP definition, comments on the length of course / study have been included in this section.

Question 6. 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.

The definition of the BAP is being revised, and a new **draft** definition outlined below:

‘Benchmark Academic Pathway (BAP), is the primary course structure, offered by the Provider, that leads directly to the Accredited Academic Qualification. The BAP will normally consist of the equivalent of 10 semesters of full-time study over a five-year period. The BAP must provide a pathway for a student with no prior architectural knowledge or skills to meet the threshold determined in the NSCA. The BAP is the program/s of study that will be assessed by the Accreditation Review Panel. The BAP will accommodate a substantial cohort of the students that proceed through to the Accredited Qualification. Specifically, if more than 65% of students graduating from the Accredited Academic Qualification have followed a single pathway, then there is a single BAP in the program. If the proportion is less than 65%, then any pathway which has more than 20% of the complete cohort is designated a separate BAP. As part of the accreditation process the ARP must assess all BAPS. If no pathway qualifies as a BAP under these guidelines (ie. no single pathway accounts for the education of more than 20% of graduates), then all graduates must be individually mapped against threshold expectations of the standard.’

Is this definition feasible? Should any changes be considered? If so, why?

AIA NEC

The revised definition of the BAP is noted. This should be provided as part of the draft ANZ APAP documentation for stakeholder review. The inclusion of assessment of up to two BAPs in a standard ARP visit is considered a more significant change to the procedure especially in light of the reductions to the duration of the visit and the panel size. The NEC question whether the term Benchmark Academic Pathway should be used if more than one pathway is being considered by an ARP. A Primary Academic Pathway and Secondary/Tertiary Academic Pathways, where two or more exist, would provide a more accurate nomenclature.

AIA ACT Chapter Education Committee

Endorses the AIA position detailed in their letter of 18 April 2017.
Nil additional comment.

AIA SA Chapter Education Committee

Could this lead to an increased workload for visiting panel members if they are not only reviewing course information but are assessing if the material combined constitutes an accredited program? Could panels assessing more than 1 BAP have more work to complete than if assessing one single BAP? If so how would this be resourced?

AIA WA Chapter Education Committee

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.

AIA NSW Chapter Education Committee

The NSW Education Committee would like to see greater scrutiny of undergraduate degrees included in the standard program assessment accreditation process. As it stands the definition is not feasible. It is also probable that under the current definition large proportions of students will not have their UG architectural educations considered at all. Indeed, under the current definition, it is possible for a school of architecture to have no BAP at all.

AIA EmAGN WA

Nil comment.

Architects Board of WA

The Board notes that the definition does not appear to encourage flexibility or movement across jurisdictions for students as it seems to discourage anything other than 5 years of study in one place.

However, the Board does not have any concerns with the proposed definition of "Benchmark Academic Pathway (BAP)", as such.

BOAQ

Text from the fifth sentence onwards (starting with "Specifically, if more than 65% of students….) should be excluded from this definition.

The emphasis should be on ensuring the quality of demonstrated competencies of graduating students. The pathways which students take to graduation are of less interest to accrediting bodies whose primary concern is the quality of graduates. If any competency is achieved, other than through the Benchmark Academic Pathway, providers should be asked to provide evidence of the way in which this competency had been assessed in any advanced standing/credit arrangement for a cohort of students or for an individual student. This would be consistent with a process which requires that providers show evidence of the student performance at the point in the program where any competency is designed to be achieved. If credit or advanced standing is awarded and students are admitted at a point beyond which a competency is nominated to be achieved in the BAP, the achievement of this competency by this student should be evidenced either through a process of admission documented by the provider or through evidence in the student's work.

Particular emphasis should be on ensuring that quality standards are maintained at the threshold level. For example, it may be necessary for accreditation panels to review the entire portfolios of work for students who achieve low, yet passing, grades at graduation.

NSW ARB

Nil comment on the BAP definition.
Course length

On the matter of course length, we note a significant discussion is in play regarding 10 semesters or 5 years. We note that with the introduction of trimesters, 10 semesters of study may soon be able to be completed in 3.5-4 years.

However, we believe this discussion to be a distraction from the key issue, which is the duration of a 5 year degree in terms of hours. The Board, and particularly the architect members, have reflected on the duration of their degrees (5 years of 16-week semesters with significant contact time) and the current diminution of this, made explicit as a result of the trimester move underway at various universities, where 11-12 week semesters are now the norm and in many cases contact time for key subjects is reduced and in some cases significant parts of the program (construction, professional practice) have been vastly reduced.

A simple calculation suggests that over the past 20 years, the actual duration of courses has reduced by about 33%. In broad terms, the Board asks whether we can in fact consider a course suitable for accreditation given that over the past 20 years the reduction in course duration and contact hours equates to roughly to a course now which is only 66% of what used to be deemed an appropriate amount of study.

If, as a result of the ANZAPAP review it is deemed appropriate to accredit such reduced education programs, the Board asks what we should consider to be a reasonable lower limit? At what point is the duration of the course too short, or the content too limited, to be considered a valid pathway to registration without a bridging course post completion of a Masters degree?

Does the AACA have a position on this? Or is accreditation not ultimately a position regarding some absolute requirements but the "best of" a current situation?

These questions may invite a discussion on supporting infrastructure that may be needed at some point in the future – such as a bridging course, 'internship' or the like given the evidence of reduction in course duration and content that is an underpinning assumption in the current environment.

ARBV
Nil comment.

APBSA
The definition of BAP appears reasonable on the basis that it does not impact on the current course structures.

Can the 10 semesters be clarified – is it time based or other?

AACA NAP
Nil comment.

Univ of SA
Nil comment.

Univ of Canberra
Endorses the AASA response.

UNSW

Endorses the AIA NSW Education Chapter response

Univ of Sydney

Nil comment.

ANZAPAP Steering Committee

Why has the Development Group identified 65% as the threshold proportion of a graduating cohort for identifying a single BAP? It is possible to have a 65% graduating from a single BAP and 20% graduating from a second BAP.

AASA

Nil comment.

ADBED

The calculation of Benchmark Academic Pathways, as proposed, allows a program to have three pathways, one at 65%, one at 18% and another at 17%. Only one of these would be assessed as the threshold definition of a BAP is 20% of the cohort. This could lead to a reduced quality of programs and graduates, with significant numbers of less academically successful and/or less adequately prepared students being marshalled through pathways that are not under the scrutiny of accreditation.

ACA

Changes to the benchmark academic pathway terminology from a 5year qualification to 10 semesters of prescribed course work or equivalent timeframe. The 5-year length of the course is required for students to develop the complex and critical thinking required by an architect. To think across both broad scale and fine detail takes years of practice. By reducing the potential length of the course, the time to develop the complex and critical thinking is reduced. Although the Provider will need to undergo the accreditation process more often, that will be offset by the number of students potentially moving through the university as they see it as a "fast track" to completing their degree. The ACA is concerned that this may result in an inferior graduate outcome and the future of the profession.

NZRAB

NZRAB supports the adoption of this definition of the Benchmark Academic Pathway.

Bruce Callow (WA)

Nil comment.

Ian Hamilton (QLD)

Nil comment.

Section 9 – Professional Advice

> Question 7. 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.
>
> 1. Should any additional opportunities for professional advice be incorporated into the ANZAPAP?
> 2. If yes, how should these opportunities be incorporated and how should they be funded?

AIA NEC

Feedback regarding Professional Advice cannot be provided until the draft ANZ APAP is released for review. There is no evidence to support the suggestion that the Professional Advice provided in the current ANZ APAP reports adds to the cost of the procedure.

AIA ACT Chapter Education Committee

Endorses the AIA position detailed in their letter of 18 April 2017
Professional Advice has a place in the accreditation procedures and can provide useful collegial and professional information where such detail is not appropriate as an Action Item and thus recommends its retention in the Procedures and continued alignment with the Institute's *Tertiary Education Policy* and *Policy Standards*.

AIA SA Chapter Education Committee

Professional Advice should remain a part of the ANZAPAP in a similar form to the current guidelines. This provides a meaningful way of addressing changing issues in professional practices which can change significantly within timeframes as short as 1-2 years.

The reduced status + visibility of Professional Advice is a concern and it would be advantageous to reintroduce a section in the Report which allowed for some more discursive observations, and suggestions. Another option would be to schedule a face to face Professional Advice Session [PAS], as part of the ARP visit + toward its completion. This could be minuted, and added as an addenda to the ARP Report. Alternatively a PAS could take place post the finalisation of ARP Report and before the Head of Schools response. [The latter option could be conducted via Skype to minimise costs]. This could also be recorded and archived either as hard copy or mp3 file, as additional material supporting but not embedded in the report.

AIA WA Chapter Education Committee

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.
[*Note this feedback is included in Section 9 and Section 14*]
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.

AIA NSW Chapter Education Committee

1. Absolutely. Without professional advice there will be no opportunity for members of a visiting panel to comment on the broader cultural, and quality-related issues of the school. Without professional advice, the process of accreditation will be merely a bland box-ticking exercise on NSCA criteria… (The visiting panel could be completely composed of administrators if professional advice is to be devalued).

2. The opportunity currently exists. Surely it would be a matter of the new ANZAPAP retaining the existing inclusion of Professional Advice. Many of the committee have been on NVPs in recent years and did not have the sense that 'Professional Advice' required any particularised funding model in addition to that proposed.

AIA EmAGN WA

Nil comment.

Architects Board of WA

In relation to this question, the Board simply submits that any additional opportunities for the provision of professional advice to Providers should be funded by the Providers themselves.

BOAQ

We recommend that any provision of separate professional advice, as currently allowed for in the ANZAPAP, should be discontinued. The accreditation procedure should provide recommendations for action related to the competencies only.

We see no place in the ARP Report for advice that is not germane to the question of the program's accreditation and thus included in recommendations.

Programs wishing to seek professional advice in respect of their quality should make their own arrangements to do so. The role of accreditation is to determine whether the course should be recognised for the purposes of regulated professional practice in the Australian architecture profession.

Consequently, the following changes should be made to Table 4: Content Overview of the Provider Accreditation Submission and the Accreditation Review Panel Report (ARP Report) (p12) to reflect the above:
- Part III – Remove "Summary of Recommendations (profession advice)
- Part IV – Remove "Additional Commentary"

NSW ARB

Expanding knowledge domains
The Board reaffirms that architectural education should integrate knowledge from across a range of knowledge domains; comprising the social and ethical, disciplinary, sustainability, regulatory and communications. But while these domains underpin the National Standard of Competency for Architects, little context or definition can be found by those seeking to better understand their purpose and scope.

The Board believes these domains of knowledge draw from, and are defined by, a community of practice that can often be documented in the form of industry practice guides and standards. Where those guides and standards are up to date, and consistently applied, we see value in an explicit reference to them as part of a hierarchy of documents that may inform the implementation or application of some accreditation procedures.

This approach is relevant to Question 7 posed in the Review.

[*Note that this feedback is included in Section 9 and Section 19*]

ARBV
Nil comment.

APBSA

The inclusion of professional advice within action items is useful to the provider, the panel and the accrediting board. Professional advice provided as a 'discussion item with the provider' may not be documented.recorded, so this is a weaker means of distributing information and may not be useful or remembered (eg staff promotions, retirements, relocations or resignations means that the conent of a conversation may not be disseminated to the incoming staff). Also, the transference of verbal advice assumes a level of understanding between parties, and it does not necessarily interrogate the 'receivers' interpretation of what has been said.

Consequently, the APBSA proposes that Professional Advice should be reconsidered as there is no way to formalize this in the new process if it is limited to 'discussion'. Professional advice could be integrated in the summary statement(s) under the competency review – in this way there is a written record within the report. Funding for this should be allowed for in the base cost.

AACA NAP
The NAP supports the focus of the ANZAPAP as an assessment of whether the program subject to an accreditation panel meets the threshold standard as articulated in the relevant performance criteria in the National Standard of Competency for Architects.

However, the matter of Professional Advice is likely to be a contentious issue in the revised procedure. The NAP requests the Development Group provide further clarification of the statement below.
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.

Given the reduced scope of material placed before an ARP for inspection, there is a significant reduction in what might be addressed by professional advice.

There should be clear guidance and framework for what may constitute professional advice as the matter of what constitutes Professional Advice is likely to be a contentious issue in the revised procedure.

The NAP requests the Development Group provide further advice regarding the statement below.
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.

The proposal to incorporate professional advice into the Action Items in the ANZAPAP report has the potential to maintain the confusion that currently surrounds the accreditation process, for providers, academic staff, panel members and the architectural profession. This confusion manifests in the lack of understanding about the purpose(s) of the accreditation process (often on the part of academics teaching in the programs being accredited) and leads to uncertainty about the level of student work that needs to be provided as evidence of threshold performance. Often institutions try to highlight excellence rather than transparently display the lower level work. While clearly the peer review process of the ANZAPAP procedure is considered valuable, it is important to distinguish this from the accreditation purpose.

There may be a number of ways forward on this:
i.   maintain the definition of 'accreditation' as evaluation of threshold performance and make a clear distinction in the ANZAPAP documentation and process between accreditation and 'peer review' (whic promotes the improvement of educational objectives and outcomes);

ii.   in line with (i) above, consider establishing two smaller panels (or one panel with some split representation) to concurrently assess a program with respect to its
    a.   threshold performance (reporting to the Boards and leading to accreditation, ensuring qualification of graduates to commence the pathway to registration) and
    b.   educational standards and outcomes aspiring to excellence (in line with the AIA Education policy, AQF, AAECF and other reporting requirements);
  OR
iii.   expand the definition of 'accreditation' to encompass the threshold interpretation AS WELL AS the reference to higher standards of credibility and integrity (as in the Standards Australia definition, for example).

The consequence of these two suggestions is likely to be similar, that is, a dual outcome recognising both the threshold level of graduate achievement as well as promoting the advancement of architectural education. The mechanisms to getting to this outcome are slightly different, and might be considered for the ways in which various stakeholder interests and contributions could be incorporated.

Univ of SA
No, this isn't necessary. Providers can establish their own processes for attaining 'professional advice' for their programs from Program Advisory Panels or School Advisory Boards, etc.

Univ of Canberra
Endorses the AASA response.
Additional comment: Professional Advice (p. 23): We are concerned that Professional Advice is proposed to be removed from the accreditation process as a distinct part of the process. In the current procedures, Professional Advice plays a valuable role for additional peer and industry advice on matters that are different from action items and provide a more comprehensive consideration of program specific character and ambition. Under the current ANZ APAP procedures, Professional Advice also specifically references the Institute's Tertiary Education Policy and Policy Standards and thus helpfully broadens the visiting panel's scope and reporting outcomes

UNSW

Endorses the AIA NSW Education Chapter response.

Univ of Sydney

ANZAPAP plays an important role of oversight within a tertiary sector where the imperatives of professional education and accreditation are not always paramount. There is evidence of important advocacy from previous NVP, genuinely highlighted in reports by way of a dedicated section, supporting and assisting a Provider to argue for improved resources for example. Allowance for a separate Professional advice section is therefore preferable to subsuming this into the ARP report where it might either be overlooked or effectively lose its distinctive strategic value for the Provider within its Institution.

ANZAPAP Steering Committee

It is not possible to offer professional advice to programs on the basis of a review submission that includes pass work only. It is not possible to gauge the capacity of a program to attain graduate attributes or benchmark learning outcomes [which, when evidenced in work, may look very different to work meeting competencies for a built work of architecture] on the basis of pass work only.

AASA

Nil comment.

ADBED

It is the view of our members that the peer review aspect of NVPs in the present system has not been well-defined in terms of its scope and limits. For these reasons professional advice is frequently poorly informed and tending to overstep the mandate and capacity of a three-day review. We question whether this aspect of accreditation, in fact, contributes to the maintenance of quality architectural education. We also question the value of professional advice in the context of University processes of quality review of programs that include research, teaching and engagement in their mandate, and which are undertaken by academics with a thorough understanding of the context.

ACA

Nil comment.

NZRAB

NZRAB supports the removal of Professional Advice as a separate item.

Bruce Callow (WA)

Nil comment.

Ian Hamilton (QLD)

Nil comment.

Section 10 – Suggested Evidence Guidelines for Providers and Panel Members

This document was released as a DRAFT document for consultation purposes only.

Architects Board of WA

The Board agrees that guidance should be given to Providers with respect to how their course content can be mapped to the required student outcomes, as defined by the NSCA Performance Criteria.

With reference to the Table 1 on page 3 of the Suggested Evidence Guidelines for Providers and Panel Members, the Board proposes that in the "Suggested Evidence/Suggested Examples" column, the core subject areas (such as "History") should be listed to give context to the evidence required.

BOAQ

Evidence for achievement of a performance criteria should be reasonable and non-binding. We propose that further feedback be sought from Boards once the views of providers are known following completion of this consultation process.

ARBV

The document outlining Suggested Evidence Guidelines for Providers and Panel Members should be deleted from the ANZAPAP package. It should be up to each school to demonstrate how performance criteria are addressed particularly as teaching and learning processes are evolving. Panel members have the expertise to assess whether criteria have been addressed based on the criteria provided by each school. The risk of this document and it advice around evidence is a dumbing down of processes if providers take a check-box approach. It is inappropriate for this committee to suggest the mode of providing evidence (e.g. 'examination', scenario-based assessment', 'short/long essay', 'worked examples' etc). University providers are best placed to develop a program of education and the associated assessment.

AACA NAP

The NAP view these as useful Guidelines only, not as a template report. Programs will determine how evidence is presented to demonstrate achievement of the relevant performance criteria.

Univ of Sydney

(comments directed only at columns 3. *Suggested Evidence of PC provided by student response to assessment* & 4. *Suggested examples of assessment task*)

The wording `student work provides evidence' could be problematic. The word `student' is used in the singular throughout. Yet the implication is that BAP compliance is being evaluated at threshold level across all PC, rather than at an individual student's level. The reality is that multiple students' work will be documented to demonstrate different PC across the BAP. The process as described cannot gauge the extent to which an individual student has achieved compliance across all PC within the BAP; and therefore how successful that BAP has been in delivering PC to that individual student and, by implication, across the cohort. Consideration could be given to requiring evidentiary documentation of track record across all Units of Study in the BAP (ie. Masters of Architecture) for one (or more) threshold performing student(s).

Further, Programs are increasingly employing collective/group work settings to deliver content and examine performance. The guidelines might be improved with some advice/requirements related to evidence that involves group work and multiple authors.

There is likely to be practical difficulty for Providers to determine an explicit and effective means of communicating PC where such compliance is evidenced across multiple Units of Study, and/or multiple assessment tasks --- that is, where it is implicitly rather than explicitly demonstrated. Normally this had been done in dialog with staff during the Panel visit. With the proposed digital reporting framework, accounting for these kinds of complexities will be challenging for Providers and for the Panel's appreciation of the BAP.

Bruce Callow (WA)

What is unclear to me, in the process of AACA & AIA having gone to the trouble of reviewing the ANZAPAP process in relation to the new NSCA, is how the format of what providers present for assessment to the NVP panel will be any different from what has been presented in the past.

Traditionally course providers have presented the material to be assessed for accreditation on the basis of the illustrating work from the core subject areas without necessarily demonstrating how the subject material demonstrates the relevant NSCA competencies required for accreditation. If this continues there will have been little value in reviewing the process. The core subject areas have also been the main focus of the AIA Education Policy and this is possibly why course providers have followed this format.

On the proposed 'Guidelines', in the column headed *"Suggested Evidence of PC provided by Student response to assessment"*, and possibly in the 'Knowledge Domains' column, there needs to be a reference to how the PC's for the various competencies have to be identified and demonstrated in the context of relevant core subject areas. Many of core subject areas are easily related to specific competencies or PC's, but other subject areas such as history & theory are not necessarily directly related to a specific PC and could be left out or overlooked in a course. It is not uncommon in some courses to see much less emphasis in history and theory that there used to be, and heritage and conservation also overlooked. Not all core subject areas are represented in all years of a course and may be present in the Bachelor, such as history and many of the communication units, but not the Masters whilst it is only the 'Masters' that is accredited. This also raises the question of whether some requirements of the core subjects and their relevant competencies/PC's should be stated as being the expectation for Bachelor courses seeing that the Bachelor does not specifically form part of the accreditation even although it is a necessary pathway and will contains units/subjects that are essential for the Masters.

A possible solution may be that NVP 'Guidelines' require submissions to provide a Matrix that requires the course providers to illustrate the Competencies and PC's that are being covered in each of the units of the core subject areas. The course work that is then presented for assessment should illustrate the outcome of the competencies within the context of the subject area. In this way, when the time on the ground for the panel members is being shortened but the course work is being presented in advance of the NVP visit, the matrix will provide a good tool for panel members to prepare for the visit and focus on the work that has been tabled to see if the PC's are being properly reflected in the outcomes of the course work. This will save the panel members from having to identify, as in the past, which PC's are relevant to each subject/unit and then searching the material at random to find the relevant PC have been adequately addressed.

A matrix format such as this would make the expectations of an NVP a lot more tangible for course providers in deciding and compiling the sort of information that they think the panel might want to see. Experience on NVP panels demonstrates that often the course providers, or the person allocated the task, flounder about guessing what the panel may want to see and how to present it. Too often there is a lot of irrelevant padding in the material presented by course providers although the revised ANZAPAP process seeks to address this. A matrix would also assist panel members from having to work out how they will identify the relevant PC's in the bundles of work presented for a subject area and which is often provided with little explanatory information, especially in how the unit and the expected outcomes are to relate to particular competencies/PC's rather than just identifying particular knowledge and/or skills that will be learnt by the exercise.

Such a format would also be in line with other AACA processes where applicants for assessment of overseas qualifications (OQA) and architectural practice experience (OAA) provide a matrix that sets out how the necessary competencies can be cross referenced and identified in particular course work or projects that are presented for assessment.

Section 11 – Student Exhibition

AIA ACT Chapter Education Committee

Endorses the AIA position detailed in their letter of 18 April 2017

The CEC is concerned by the suggestion that there will no physical exhibits submitted for accreditation visits. University education – and contemporary practice – relies on a variety of mediums and visualization strategies from traditional written reports, to physical models, free hand sketching, to digital modelling and the accreditation procedure should interrogate all such mediums. Discussions around multiple medium formats lead to better comparative assessment and thus more productive feedback.

AIA NSW Chapter Education Committee

Providers may choose to schedule an exhibition of student work raises questions as to the role the exhibition will play in determining accreditation. We note that the document states it is outside the scope of the formal accreditation process, however if it is not included, why allow for it? Such an exhibition can lead to inequalities in the review process.

NSW ARB

We note the recommendation to no longer have the student exhibition as a compulsory element of the Accreditation Visit. It is our view that a student exhibition is a fundamental part of the ARP visit. Removing the student exhibition results in a lost opportunity to study an exhibition of drawings, models and the like in non-digital formats, thereby detracting from the possibility of gaining clarity or identifying problems that may result in the making of valid and useful recommendations about the program.

- We recommend that the requirement to mount an exhibition of student work including pass, credit and distinction level student work should be a mandatory part of the ARP Accreditation Visit procedure.
- We recommend that the requirements of a student exhibition are clearly stated, to bypass commentary regarding the effort and/or cost of this exhibition. We believe that a clearly specified set of requirements will avoid the disparity regarding this element across various schools while also insisting that it is not unreasonable for schools to mount such an exhibition every 3 or 5 years as it may be given the significance of the accreditation procedure.

ARBV

A physical exhibition should be mandated to complement the digital exhibition in order support an efficient Panel process. The physical exhibition helps the Panel work effectively. It is a great introduction to the school and can provide a panel with a good summary of the student output. With the exception of the UK system, this may be unprecedented. The student exhibit should be required for all schools.

AACA NAP

The NAP is concerned that the reduction in panel size, the reduction in the number of days, the deletion of interim Review Panels as face to face visits and the non compulsory physical exhibition may collectively lead to a perception of a shift to a minimal approach of 'box ticking' than a quality assurance approach.

UNSW

Endorses the AIA NSW Education Chapter response.

Additional comment: We reiterate the view of the Education Committee that the guidelines are not satisfactory. We believe that an online exhibition of work representing threshold pass, credit and high distinction work should be required.

Univ of Sydney

Student Exhibit. This is framed as `not mandated' and `outside the scope of the formal accreditation process and visit requirements' --- and therefore effectively optional. Yet the current wording is ambiguous: "*Schools may also display a physical exhibition of pass, credit and distinction level student work as the exhibition plays another role in showcasing the quality of work at the school and providing a useful forum for benchmarking.*"

This ambiguity could potentially lead to inequitable and incomparable submissions. Some providers may consider it in their best interest to mount an exhibition (and wear the consequent institutional and workload costs), others not; some may mount extensive exhibits, others more modest; some may populate their exhibits with high score student work within each band level, others with threshold work. The guideline in this respect should be definitive and unambiguous.

Univ of Canberra

Endorses the AASA response.

Additional Comment: Nature of exhibits documenting student work: digital portfolio versus hard copy exhibition of drawings and models (Recommendation 8.C, p. 28). A combined presentation of digital and physical exhibits (drawings and models) better reflects the diversity of pedagogical approaches and the range of visualization and communication mediums in the best of contemporary architecture education. The requirement to assemble and format solely for hi-resolution digital portfolio submissions will introduce a significant burden on program providers without clear assessment or reporting benefit. The connection between student work in all its formats, and between professional practice and the universities is traditionally teased out in accreditation visits through conversations between academics, practitioners, and students around extensive samples of student work seen comparatively during panel visits. Opportunities for discussion between academe and the profession have traditionally been considered vital to education providers and fall clearly into the remit of the accreditation procedures.

ADBED

The review hedges its bets around the issue of digital submission of student work at pass standard versus physical exhibition of work across all grade levels. As currently written the proposal suggests both are in order, one to address competencies and the other to provide a 'useful forum for benchmarking.' This ambiguity could provoke a doubling of the workload for preparation for accreditation. Schools will feel pressured to mount an exhibition in addition to the compulsory digital submission of pass work, when in earlier discussions the digital was meant to substitute for the mounted exhibition of physical work. [*This comment has been included again at Section 14 on Submission of threshold or pass level work*]

ACA

Our concerns are: that the removal of the mandatory requirement of a student exhibition as part of the Site Visit will mean that the requirement will not be undertaken by the Providers due to the time and effort it takes to set up an exhibition.

The student exhibition format allows for an excellent overview of the students' work and allows for easy comparison between achievement levels within a year and across the school. To remove the exhibition would make the reliance on digital presentations more crucial.

Section 12 – Panel Size and visit duration

AIA ACT Chapter Education Committee
Endorses the AIA position detailed in their letter of 18 April 2017

CEC believes a smaller assessment team will limit local engagement from both Institute and Boards and interstate academics and this is a disadvantage to the potential role of the accreditation procedure to inform the character and quality of program delivery.

Local character is fundamental and unique: architecture programs should be enabled to hold on to their specific charter and qualities and this will be better supported by a larger visiting panel, and thus reiterating the above comment on panel size as well.

AIA SA Chapter Education Committee
What is the make up of the 5, 6 or 9 person panel?

NSW ARB
We note the reduction in length of Accreditation visits. While we understand the cost and time implications, our view is that a two day program gives, in reality, one day to review the program after introductions and conclusions.

We recommend that ARP Accreditation visits are a total of 2.5 days in length, commencing in the afternoon prior to the first full day. This introductory half day session would allow an appropriate portion of time for meaningful staff, personnel and course introductions, thereby leaving 1.5 full days for proper investigation and assessment of the program. As a result, this then allows up to half a day for the presentation of recommendations and summarising remarks as necessary for the conclusion of the ARP Accreditation visit.

ARBV
Panel membership. Could reduce from the current number of nine but five members is unlikely to provide the required spread of expertise. It is not clear if a role for a student representative remains. Current student involvement on the NVP is a strength and the feedback from students is always extremely useful and often uncovers aspects of the program which the school administration maybe unaware. Reconsider the size of the Panel to match the work required.

Visit Length .Two days could work with advance preparation but the overall process will not be as efficient for the Panel as the current three-day visit. The orientation to the school and the documentation at the start of the three-day visit by the leadership team of the School is invaluable and considering the report prior to this meeting will be of value but limited without face to face discussion between panel members. We believe it will be difficult for a Panel to achieve the same knowledge, quantity and quality of work in the reduced time.

AACA NAP
The NAP is concerned that the reduction in panel size, the reduction in the number of days, the deletion of interim Review Panels as face to face visits and the non compulsory physical exhibition may collectively lead to a perception of a shift to a minimal approach of 'box ticking' than a quality assurance approach.

Univ of Canberra

Endorses the AASA response.

Additional Comment: Size of Visiting Panel (p. 7): For a regional school, a close relation to local practice and the Institute Chapter is beneficial. This suggests that the current panel size, including local and interstate practitioners and academics, should be maintained. This also continues to ensure a breadth of experience from panel members across all competency areas.

Univ of Sydney

Accreditation Visit Duration: while the reduction to 2 days is understandable, the Panel may not be able to fully appreciate a Provider's documentation (submitted digitally in advance of the visit) without clarification and contextualisation that are best communicated in situ. Opportunities for clarification of a Provider's documentation by the Panel pre---visit and during the visit should be factored into the formal process.

While on paper this makes sense, the additional off---site work via digital platform should not be underestimated and needs to be properly modelled and quantified. Much of the AZASPAP process involves clarification that to date has taken place in dialogue during the visit. In the current framework, the forum for dialog is reduced. The digital platform could in fact prove cumbersome and counter productive.

ACA

[Regarding the reduction in duration from 3 to 2] Our concern is: that the reduction of the amount of time on site is insufficient to properly review the portfolios of 5 year levels of students work and the pedagogical requirements of the coursework.

[Regarding the reduced panel size] Our concerns are:
- that the reduction in the number of the reviewers may also reduce the number and variety of viewpoints and suggestions as to where the Provider could improve.
- Quality of the response from Providers is a reflection of the review and criteria provided to them. It is a minimum requirement, but the Providers see it as the benchmark they need to meet rather than exceed.

Section 13 – Panel composition and standing panel matters

AIA EmAGN WA

Note – see comments on student representative issues in ANZAPAP in General Feedback Section.

NSW ARB

ARP standing lists

To date, the standing lists from which visiting panels are assembled has, by and large, been jointly compiled and managed by the Australian Institute of Architects Education committee and state chapter staff members, state registration bodies, and the like. Generally, the list has been 'held' and managed by Institute of Architects staff members. However, the experience in NSW is that the revision of the panel members list has been slow and ineffectual, with low turnover of members; no diversity policies for either the compiling of panels nor the management of the actual panel list; and ill-defined selection criteria for panel members.

We strongly support the development of a process whereby panel members can self-nominate and be assessed for suitability by a panel. This process would alleviate some of the pressure on the current list stakeholders to find new members – a process which at times as purely been on personal recommendations. Existing panel members should be asked for updated CVs and other such information to demonstrate relevance and understanding of the requirements for the interviews you are fronting.

We believe that in taking the Accreditation Panel, and the very concept of accreditation seriously, it is reasonable that the panel itself comes from a transparent procedure that insists on a high level of credibility among the panellists.

ARP panel size

We note that whilst a small group has an innate efficiency and a reduced chance of 'factions' or alliances being formed, the reduction to five (5) members will result in far less 'eyeballs' viewing the student work that schools are presenting. This becomes further exacerbated in the case of a large or complex project. We recommend that the panel size be increased to seven (7) members, to allow for greater diversity, ease of assessing presented material in more depth, and/or design presentation / resolution. A reduction to less than 5 would call into question the veracity of the procedure, in our view.

If the reduction in length of Accreditation visits were to proceed, is becomes even more important that the size of the panel is not also reduced.

ARP panel composition

Further to our comments and recommendations above, we note that the panel composition for any IRP or ARP process needs to closely adhere to a set of developed criteria that properly reflects an individual's current or recent past involvement with education, the profession, the business of architecture, and outside of the profession.

APBSA

[*General commentary on*] Panels

-   The APBSA assumes a PAP is made up of assessors from the advisory panel so expertise is maintained. Can this be clarified. A role description for the panel members would be a positive change.

- A template and briefing for panel members would be a big improvement. Newcomers in particular need to understand the expectations and reporting requirements. Also, variations (in language and detail) can vary across reports and this should be addressed.
- There needs to be a clearly understood expectation of what the schools should provide because if the information is not properly coordinated and presented the panel will be less efficient.
- The APBSA encourages panels to include members from outside the jurisdiction where the school is located – this is both inclusive and provides for cross fertilization, potentially resulting in more consistency in panel reports.

NZRAB

Supports the concept of the Visiting Panel being fewer in number and that preliminary evaluation of the programme would be undertaken prior to the onsite visit, but notes that the quality of the documentation will be critical .

Section 14 – Submission of threshold or pass level work

AIA ACT Chapter Education Committee
ACT CEC is not in agreement on limiting review to threshold pass student material and believes there is benefit in seeing the breadth of student work, the quality of education, and the full spectrum of the ways in which the program is excelling. University curricula should distinguish the profession. Threshold outcomes in digital reproductions is not representative of the skills taught and needed for emerging architects: the ability to explore, experiment and interrogate are some of the most valuable outcomes of the university education and these should be reflected in the procedures as they are at present.

AIA WA Chapter Education Committee
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.
[*Note this feedback is included in Section 9 and Section 14*]

AIA NSW Chapter Education Committee
The School Report contains examples of pass level student work only so that the threshold standard can be assessed. Representatives on the Education Committee were unanimous in their philosophical concern in assessing the lowest common denominator in lieu of analysis of the spectrum of work across pass, credit and distinction levels.

ARBV
Student work. Only threshold level work is now required. The medium and high-level examples help the Panel understand the quality of the program. At least one medium and high example of work should be provided in addition to the threshold level work.

Univ of Canberra
Endorses the AASA response.
Additional Comment: Pass (threshold standard) level work only (Recommendation 8.C, p. 28): The Program is not in agreement on limiting assessment to solely Pass level work. The accreditation procedure, as a process of peer and professional review and conversation, is valuable to schools/disiplines/departments of architecture. While we support the move to make some material available online – further discussed below – the elimination of Credit and Distinction work from the procedure visit does not create a comprehensive impression of a program and thus does not allow the depth of review and comment from industry and academic peers so productive within the current procedures.

ANZAPAP Steering Committee
The SC remains concerned that the ARP report is based only on pass level work. The capacity of the ARP to comment on the capacity of graduates of a particular program to meet attributes and learning outcomes of the AAECF cannot be gauged on the basis of pass level work only. [Recommendation 2. Table 10] Does the report contain course outline material? Can the report contain an example of work deemed to meet learning objectives and criteria?

ADBED

The review hedges its bets around the issue of digital submission of student work at pass standard versus physical exhibition of work across all grade levels. As currently written the proposal suggests both are in order, one to address competencies and the other to provide a 'useful forum for benchmarking.' This ambiguity could provoke a doubling of the workload for preparation for accreditation. Schools will feel pressured to mount an exhibition in addition to the compulsory digital submission of pass work, when in earlier discussions the digital was meant to substitute for the mounted exhibition of physical work. [*This comment has been included again at Section 11 on Student Exhibition*]

Section 15 – timing of submission of Provider Accreditation Submission

The Stakeholder Consultation Pack noted the requirement for the submission of the Provider Accreditation Submission 12 weeks rather than 8 weeks. See comments against Recommendation 8.A, Table 10, page 27.

AIA WA Chapter Education Committee
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.

UNSW
Endorses the AIA NSW Education Chapter response.
Additional comment: The stipulation that the Submission is required a minimum of 12 weeks prior to the scheduled visit seems needlessly excessive. As UNSW will be moving towards 3 semesters in 2019, the 12 week lead time makes collection of relevant work impossible. Given the move to online documentation and distribution to Review Panels, we believe 6 weeks would be sufficient for scrutiny of the material.

Univ of Sydney
Timeframe for the Provider Accreditation Submission of 12 weeks in advance of the ARP Visit may not be realistic. A September ARP would necessitate a June submission and potentially exclude Semester 1 student work. This may cause all ARPs to be scheduled in October/November. Better use of the digital interface for PAS should be able to reduce the 12 week review timeframe and provide some initial and timely sifting of non compliant submissions. Submission requirements, and any associated template, should be explicit and detail the evidentiary material required, and equally the material not required and that will not be taken into account. In articulating submission requirements and templates, caution should be exercised in that digital material is open to manipulation (in contrast with analog work exhibited in situ).

ANZAPAP Steering Committee
The detailed report ('School Report') from education providers addressing accreditation criteria, should arrive at the Secretariat a minimum of **8** weeks in advance of the visit, not 12 as noted in Recommendation 8.A Table 10. If the report must be presented 12 weeks before a visit, it will not be possible to include student work from the semester just completed as required.

ADBED
The proposed requirement is for the Provider Accreditation Submission to be submitted 12 weeks in advance of the Scheduled ARP Visit (it was 8 in the first round of consultation). Is this realistic for architecture Schools? For an ARP visit in the mid-semester break in the second half of the year (September), this would mean that the submission is due in June. Student work for the first semester, one of the two semesters to be reviewed, may not have even been submitted when the submission is due. The Management Committee would find itself organizing all ARP Visits for October and November. The argument is made that 12 weeks is needed to review the digital submission and locate deficiencies. This could be easily addressed using a clear template that prevents final submission if there are missing parts (as is used by the Australian Research Council for grant applications). A template is proposed but not detailed. Electronic submission allows instantaneous distribution to assessors, so the long period seems unnecessary.

Section 16 – Content Overview of the Provider Accreditation Submission

AIA ACT Chapter Education Committee

Table 4: Content Overview of the Provider Accreditation Submission and the Accreditation Review Panel Report (p. 12) implies that architecture program assessment is organised around nine stages of what appears to be a conventional project procurement model. This is alarming and is not representative of the holistic nature of architecture education. The institute's Tertiary Education Policy, incorporated into and underlying the current Procedures, is more representative of the ambitions the profession should have for Australian university graduates and more indicative of the range of services provided and skills required in contemporary practice. The monocultural vision implied in Table 4 does not reflect the breadth of knowledge and skills called for by current and future architecture professionals and thus appropriate for inclusion in university curricula.

[Note this comment is included in Sections 16, 17 and 19 due to cross-over in content]

AIA SA Chapter Education Committee

Overview of Provider Accreditation Submission

- Communication subjects not included.
- History & Theory subjects not included.
- Architectural Practice manages Project Delivery and Practice Management. Why are these noted?

AIA WA Chapter Education Committee

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?

Univ of Canberra

Endorses the AASA response.

Additional Comment: Table 4: Content Overview of the Provider Accreditation Submission (p. 12) suggests that future assessment of Australian architecture programs will be limited to 9 subject areas and that these will track traditional project procurement phases. This is worrying. With an extremely narrow focus on one area of architecture education this would be contrary to contemporary international standards. The seven subject area competencies in the current ANZ APAP – design studies and design integration, history and theory, documentation and technical studies, practice and project management, environmental studies, communication studies, elective studies – better align with and reflect the range of study areas a contemporary architecture education should contain and are more indicative of the range of services provided and skills required by future practitioners. Therefore, we do not support the proposed subject areas.

Bruce Callow (WA)

See some related comments in final section, General Commentary.

Section 17 – ARP Report (content, review and finalization)

AIA ACT Chapter Education Committee

Table 4: Content Overview of the Provider Accreditation Submission and the Accreditation Review Panel Report (p. 12) implies that architecture program assessment is organised around nine stages of what appears to be a conventional project procurement model. This is alarming and is not representative of the holistic nature of architecture education. The institute's Tertiary Education Policy, incorporated into and underlying the current Procedures, is more representative of the ambitions the profession should have for Australian university graduates and more indicative of the range of services provided and skills required in contemporary practice. The monocultural vision implied in Table 4 does not reflect the breadth of knowledge and skills called for by current and future architecture professionals and thus appropriate for inclusion in university curricula.

[Note this comment is included in both Sections 16 and 17]

AIA WA Chapter Education Committee

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.

NSW ARB

Recommendation 8H and 8I: ARP Recommendations finalisation

We support the development of a process whereby a clear process is outlined through which the delivery of recommendations by an ARP are addressed by a School, and, how these recommendations are to be progressed through a pathway to the Accrediting Authority.

We note two issues of concern that we suggest are addressed via this process:

- That a Head of Program should not be asked to sign the recommendations. There are numerous instances where this process has resulted in inappropriate leverage by a Head of Program on the content of the recommendations.
  - We suggest that all members of an ARP sign the recommendations and verify that they were presented to a Head of Program who has had an opportunity to respond with any clarifications
- That the recommendations, upon presentation to the Accrediting Authority, can be questioned by that Authority and clarification sought from the Chair of the ARP and not the program directly.
  - This process should result in a formal acceptance of the recommendations by the Accreditation Authority and confirmation of the results to the program via formal communication.

Recommendation 9: ARP recommendations and appeals

We strongly support the development of an appeals process in the context of the notes above regarding Recommendation 8H and 8I. We feel that a more independent ARP process, supported via a genuine and independent appeals process, would lead to greater robustness and transparency for the ARP Accreditation process.

Section 18 – IRPs and annual reporting

AIA EmAGN WA

Our concerns relate specifically to the detail of how this proposed process will be run and in particular the ramifications on the role of student feedback in the accreditation process with regards to the proposed removal of the Interim Review Panels (IRPs) and introduction of the Provider Annual Reports (PARs)

- Shifting accountability from independent monitoring visits to what may run the risk of being a tick-the-box annual reporting exercise by the providers does not improve student's confidence in the accreditation of their degrees.
- The existing IRP process clearly details the role of student feedback; 'Panel meets with students. Program staff should not be present during meeting with students (30 minutes)' and ''Although there is no requirement to provide students with a copy of the report, it is considered to be appropriate that the program leader report the broad IRP outcomes to the student body, particularly since comment from students is actively sought by the IRP.' (ANZAPAP December 2013, Section 5.6 & 5.7, pp 29).
- From a student and graduate perspective, we believe a strength of the current accreditation process is the monitoring of the qualitative outcomes of the university courses for students. Student culture and wellbeing, facilities and resourcing of the course, course content changes and change management processes, quality and diversity of teaching staff and continuing employment arrangements for staff all significantly contribute to the learning experience and outcomes achieved.
- There can be a clear disconnect for students between the day-to-day support provided by the staff and relevant department in contrast to that of the 'provider' (Universities). West Australian students have witnessed firsthand that in some cases the hosting of student voices within the accreditation process has resulted in recognition, dialogue and action on 'structural' issues beyond the day-to-day control of teaching staff.
- We request that the proposed interim system (PARs or other) include the ability for clear lines of independent communication between the student bodies and that of the accreditation body representatives. It is critical that student feedback is sought more frequently than at 5 yearly National Visiting Panels.

We request the following action item…..Procedural process of the proposed Provider Annual Report (PAR) to include key reporting item of independently sought student feedback on qualitative course outcomes (ie. student culture and wellbeing; facilities and resourcing of the course; course content changes and change management; quality, diversity and continuity of teaching staff). We recognise that comprehensive written student feedback would place an undue burden on student organisations to coordinate and deliver: therefore face-to-face meetings (in person or via the internet) are recommended.

Architects Board of WA

Annual Pro-Forma Reporting In its initial response to the ANZ APAP Review, the Board queried whether the proposed annual pro-forma reporting requirement, which is to replace the IRP process, would be robust enough and whether the Providers would simply report that there were no problems if there was to be no external input or monitoring. It is still not clear to the Board whether or not the proposed annual reporting is to be an entirely internal exercise by the Providers, or whether there would be any external checks and balances.

Accordingly, the Board takes this opportunity to re-iterate its concerns about the abolition of the IRP process (and similarly the PAP process) and the new regime of self-reporting that may lead to a situation where there is simply "tick-box" reporting by Providers in the absence of any external input into the process.

The Board also notes that there does not appear to be any requirement for the Provider to report on staff changes during the year and suggests that this is an important matter as staffing affects the quality of a program.

ARBV

The IRPs are a useful tool particularly for courses where there are concerns. Removing them may increase the likelihood of schools losing accreditation or being accredited for 3 rather than 5 years. One member on the IRP joins and helps to brief the Visiting Panel. The annual pro-forma can still be completed but will serve another purpose. Student involvement in this exercise has regularly uncovered aspects of the course or areas of support where the school hasn't as yet delivered. One IRP should be included in addition to the annual proformas.

NSW ARB

We strongly disagree with the removal of IRPs. We can cite numerous examples where a 5-year accreditation may be followed by major program changes, and/or examples where the engagement of an IRP enables further advocacy by a program to their institution in order to meet obligations in order to satisfy ARP Recommendations.

The IRP is understood as an integral part of the monitoring of programs and has consequential and constructive impacts on how a program evolves in between formal accreditation procedures.

We suggest two strategies via which the IRP may be maintained but without the more onerous cost and time obligations previously associated with this aspect of the accreditation program:
- That IRPs occur with a two member panel only, composed of the Chair and an education member of the previous ARP;
- That IRP's occur 50% of the way through any accreditation period, with a leeway of 3 months either side of this mark (i.e. for a 3 year accreditation, after 1.5 years, for a 5-year accreditation, after 2.5 years, and so on).

ACA

Our concerns are:
- that the removal of the interim review panel and replacing it with a Provider Annual Report to address deficiencies raised at the Site Visit removes the external independent assessment of the progress of the Provider.
- the Assessors are unable to see and review deficiencies as it may not be noted in the report.
- the Assessors are unable to provide feedback based on what they have seen on site and notify the Provider of deficiencies prior to the Site Visit.

NZRAB

Supports the removal of IRP's in favour of annual reporting.

Section 19 – NSCA and Knowledge Domains

AIA ACT Chapter Education Committee

Table 4: Content Overview of the Provider Accreditation Submission and the Accreditation Review Panel Report (p. 12) implies that architecture program assessment is organised around nine stages of what appears to be a conventional project procurement model. This is alarming and is not representative of the holistic nature of architecture education. The institute's Tertiary Education Policy, incorporated into and underlying the current Procedures, is more representative of the ambitions the profession should have for Australian university graduates and more indicative of the range of services provided and skills required in contemporary practice. The monocultural vision implied in Table 4 does not reflect the breadth of knowledge and skills called for by current and future architecture professionals and thus appropriate for inclusion in university curricula.

[Note this comment is included in Sections 16, 17 and 19 due to cross-over in content]

NSW ARB

Expanding knowledge domains

The Board reaffirms that architectural education should integrate knowledge from across a range of knowledge domains; comprising the social and ethical, disciplinary, sustainability, regulatory and communications. But while these domains underpin the National Standard of Competency for Architects, little context or definition can be found by those seeking to better understand their purpose and scope.

The Board believes these domains of knowledge draw from, and are defined by, a community of practice that can often be documented in the form of industry practice guides and standards. Where those guides and standards are up to date, and consistently applied, we see value in an explicit reference to them as part of a hierarchy of documents that may inform the implementation or application of some accreditation procedures.

This approach is relevant to Question 7 posed in the Review.

[*Note that this feedback is included in Section 9 and Section 19*]

ACA

The ACA has previously provided feedback on the changes to the NSCA, and in general was satisfied with the overarching intention of simplification and streamlining of the Core Competencies, along with clarity of use across the Programs and pathways to registration. There are, however, several concerns that we raise now in relation to the ANZAPAP, which were previously raised in feedback of the NSCA. The ACA feels that these concerns have not been adequately addressed. Our members have provided feedback around concerns of areas where students are not presenting well in practice as evidenced in the APE exams.   We would suggest that a greater level of focus be applied to:

     NSCA:6.0 Documentation
     NSCA:7.0 Project Delivery: Procurement
     NSCA:8.0 Project Delivery: Construction Stage
     NSCA:9.0 Practice Management

With an emphasis on Skills Acquisition, rather than simply Knowledge Acquisition. We do acknowledge that this did form part of the ANZAPAP Development Groups Terms of Reference, but note that much of the member concern around this process perhaps stems from a confusion of the Scope and Remit of the group in relation to the broader objectives of Architectural Education in Australia.

Section 20 – Submission and Review of Digital documents

APBSA

Digital evidence

- There is a query about how panels will review student work. The APBSA understands this will only occur 'digitally', however, it is unclear exactly how this will happen.
- More generally, 'Digital evidence' needs to be clarified as this could be unwieldy to review if a structure is not provided for the review.

ACA

The review of digital documents may not provide a comprehensive and detailed overview of student work. Careful management of the Digital Portfolio will be required for consistency, accuracy and ease of assessment.

Section 21 – Research within the ANZAPAP

APBSA

The focus is on assessing coursework. There is a trend for some research in degrees. Is this going to be accommodated?

Univ of Canberra

Endorses the AASA response.

Additional Comment: Research: The absence of any reference to the role and contributions of research in architecture education should ideally be redressed in subsequent review phases.

Section 22 – Operation of the Secretariat

Note that the Stakeholder Consultation Pack contained no comment on or reference to which organisation would be hosting the ANZA APAP Secretariat.

AIA ACT Chapter Education Committee
CEC does not see any benefit in shifting the location of the Secretariat: it has been operating seamlessly for many years in the ACT.

AIA SA Chapter Education Committee
If moving from the AIA (which we strongly believe would be a mistake):
- Job and person spec to be drafted ASAP for approval by the joint owners and prior to transition.
- How many people are doing this job (the annual salary didn't look large)?
- How is the secretariat managed with respect to ongoing corporate knowledge, sustainability of the position, transition to new staff etc.?
- Will the current AIA secretariat be offered the position? If not how is knowledge transferred?

AIA NSW Chapter Education Committee
The Secretariat's host organisation is not clearly stated in the Consultation Pack and the process for selection needs to be clearly articulated and funding checked. It should be noted that the NSW Education Committee is of the position that the Secretariat is best held by the Australian Institute of Architects as they can act as an intermediary between the Accrediting Authorities (whose national voice is represented by the AACA) and Education Providers.

NAP
The NAP notes that the Secretariat will be located in the AACA as from the 1 July 2017. The NAP recommends that the Secretariat, while developing the documentation for the ANZAPAP under the advice of the ANZAPAP Management Group, consults with all stakeholders throughout this transition period on detailed aspects of the procedure aiming for a publication date for the revised procedure of 30 November 2017.

Section 23 – General Commentary

AIA NEC

The NEC as a stakeholder, welcomes the opportunity to contribute to the review. The NEC reiterates that it seeks the opportunity to review the detail of proposed revisions to the ANZ APAP and associated structures, and notes that this needs to occur prior to setting out a proposed implementation timeframe for revised procedures.

The NEC reviewed the Key Questions and note that they do not adequately address the core objective of the ANZ APAP Review, namely the revisions to the procedure.

The NEC finds that the Consultation Pack focuses on the management and financial aspects of the procedure and provides limited information regarding the revised ANZ APAP. The information provided regarding the revised procedure does little to progress stakeholder understanding of the proposed revisions to the ANZ APAP.

As a result the NEC makes the following general comments.

1. The Consultation Pack contains insufficient information and detail to enable meaningful feedback. A full draft of the revised procedure including supporting documentation needs to be issued to all stakeholders as part of the consultation process. The NEC understands that the procedure exists in draft form and is disappointed that this information has not been provided to the Institute as joint owner of the ANZ APAP.

The timetable provided in Table 1 of the Consultation Pack indicates that a period of one month will be provided to the Institute as co-owner for review and approval of the updated ANZAPAP and finalisation of implementation plans. This is an inadequate timeframe to conduct a considered review of an important and complex procedure. It also occurs too close to the proposed implementation date to allow for any significant revision in response to any Institute concerns regarding the proposed amendments to the procedure.

2. The timetable provided in Table 1 of the Consultation Pack includes no opportunity for other stakeholders to review the draft ANZ APAP procedure prior to implementation, including Australian and New Zealand architecture programs. This does not reflect the Development Group Terms of Reference and compromises the effectiveness of the consultation process.

3. There is a lack of evidence that previous NEC feedback has been incorporated into the work of the Development Group and the consultation pack (previous advice attached). NEC continues to endorse those views. This prejudices the Institute's ability to fulfil its responsibility (Section 3 -Stakeholders on page 13 of the Consultation Pack), whereby the Institute as a recognised co-owner of the ANZ APAP is responsible with the AACA for "approval of all related documentation, implementation and ongoing review".

4. Information provided in Section 2 – Summary of Key Changes implies that the revised procedure will be a departure from global benchmarks for the accreditation of architecture programs. NEC is concerned that this will impact on the international standing of Australian architecture programs, which in turn will adversely affect international student numbers and the portability of Australian architectural qualifications.

5. The NEC endorses the position set out in the letter from the Institute CEO, Jennifer Cunich, and President, Ken Maher concerning the ANZAPAP Review.

CONCLUSION: The NEC supports the overarching intent of the Australian and New Zealand Architecture Program Accreditation Procedure: 2015-16 Review, to deliver an effective, internationally benchmarked procedure. The NEC recommends that the review process be paused in order that a more comprehensive consultation process be undertaken referring to a full draft of the proposed new procedure together with its templates and any other supporting documentation. It is unreasonable to expect stakeholders to support and approve a new system unseen.

AIA ACT Chapter Education Committee

AIA CEC makes the following first order comments.

- The ACT CEC supports the position and shares the concerns of the Institute Chief Executive and National President as set out in their letter to stakeholders dated 18 April advising the Institute is withdrawing from the ANZ APAP Development Group.
- We note that the present review is not consistent with the current ANZ APAP procedures, dated December 2013. The current procedures clearly state that reviews will occur 'at intervals of not more than five years.' (section 1.7). Thus the next review of the current procedures is not due until December 2018.
- The Consultation Pack contains insufficient information to enable meaningful feedback. A full draft of the revised Procedure including supporting documentation needs to be issued to all stakeholders as part of the consultation process. Such documentation must include a draft of how criteria may be measured. The absence of such information is worrying.
- The timetable provided in Table 1 of the Consultation Pack indicates that there is no opportunity for stakeholders to review the draft ANZ APAP procedure prior to implementation. The absence of stakeholder consultation further undermines the legitimacy of the current procedures review.

AIA SA Chapter Education Committee

In general the proposed Procedure shows a very disappointing response to the AIA recommendations, and in some cases moves even further away from a model we were critical of [e.g. from 9 to 6 to now only 5 members on the ARP]. I doubt if any stakeholder response that repeats our previous concerns is going to get traction at this stage, however it does bear repeating that many of the new procedures seem monocultural in their intention and effect, and that this is a lost opportunity to keep the process productive and valued for its holistic, pedagogical and rigorous conversations across the governing bodies.

◦ Executive summary (and the Summary of Progress)

Noted that owners approved the Stage 1 report. Previous advice to the AIA did not support many of the recommendations and identified that much further study & research was required. Noted that owners approved the establishment of a Development Group. The SA Chapter Education Committee understood that mediation process was to occur. What was the outcome of this?

Feedback summary appears to make an argument that the stakeholder feedback was of poor quality. There appears to be no evidence that previous feedback has been considered or adopted, and in some cases the previous recommendations has developed further in an opposite direction to feedback.

Rationale: who is arguing that the current process is too onerous? Cost information for the current

process should be provided to properly assess the new cost information provided.

Transition and implementation arrangements
- Appears to be rushed.
- Doesn't allow for further review, negotiation or amending.
- IRP's should be immediately reinstated as these form part of the current standard, and until a new standard is adopted there should not be changes.

Next Steps
- Owners review and approve the updated ANZAPAP docs.... what if the AIA doesn't agree?
- July is slated for the commencement of the Management Committee - this feels way too early. Expressions of interest would be required and a detailed agenda and Terms of Reference need to be developed prior to calling for EOI's.

Summary of Changes
- These recommendations for changes were reviewed in detail previously and nearly all were recommended for further review. Some were not supported at all. It appears that previous review comments and recommendations have been largely ignored.

Templates
- Multiple templates have been identified. Who is drafting these and what experience do they have. Templates should be provided ASAP for review and comment, and prior to transition. Application for Program Advice, Advisory Panel Report, Provider Accreditation Submission, Accreditation Review Report, Provider Annual Report, ANZAPAP Annual Report - and who at the AIA (as an owner) reviews and approves this?

There is a general lack of information.

The timeline for implementation is problematic as it appears overly fast tracked. This could result in significant problems for the new management committee.

Previous feedback not included - to date it appears that meaningful consultation has been replaced with a simple notification process.

AIA WA Chapter Education Committee
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.

Additional comments / questions:
- 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.

AIA NSW Chapter Education Committee
The NSW Chapter Education Committee welcomes the review and the rationale for the changes, particularly improved transparency, accountability and governance; improved stakeholder confidence in the predictability of the procedural process; and delivery of a robust, streamlined and internationally bench-marked accreditation system that makes its requirements clear and less onerous than the current procedure.

At a meeting held 22nd March 2017, the NSW Chapter Education Committee expressed concerns towards the proposed review and these can be summarised under the following broad categories:
- Significant challenges in providing constructive feedback on the proposed ANZAPAP document without viewing the actual document. It is noted that Stakeholder feedback opportunity will be limited by the information provided in the Consultation Pack. Furthermore, the program noted in Table 1 does not provide any opportunity for the Stakeholders to view the final document and this is of great concern. A more robust feedback process must be developed.
- The proposed program for the ANZAPAP review noted in Table 1 allows less than one month for Owners to respond. More time is needed for a considered, thoughtful response from the Australian Institute of Architects.
- Comments from the NSW Chapter Education Committee Stakeholder Consultation issued early 2016 (see attached) are not reflected in the current Consultation Pack. The committee were concerned that feedback is not being appropriately dealt with. [*Note - the additional document referred to was not provided with their submission*]
- The committee would like to note that the questions for stakeholder comment raised in Table 9 Section 5 of the Stakeholder Consultation Pack largely seem to be 'beside-the-point'. The committee were cynical about the ring-fencing of stakeholder feedback to what seems to be some of the more peripheral matters concerning the ANZAPAP.

AIA EmAGN WA
Quality outcomes for students and graduates, who are both consumers of architecture courses and the profession's future, must be held central to the accreditation process and this review. Tertiary architecture education is an expensive product. Architecture students expect that their degrees are accredited as part of a formal pathway to registration as an Architect. Further, Architecture students

expect that on completion of their studies they will be adequately prepared and job ready for the labour marketplace. We believe that this reality must underpin the accreditation process in its revised form. Please find below our relevant commentary in response to the following sections of the consultation pack (in lieu of Table 9 specific commentary);

Rationale We accept the rationale in this document, however must express that as a stakeholder this consultation pack has not improved our confidence in the predictability of the procedural process. This is detailed below.

Transition and Implementation arrangements Our primary concern regards the consultation documentation forming the stakeholder pack. This is an outline of the proposed ANZAPAP but not the actual draft document and associated templates.

Key Next Steps in 2017 There is no step/action that allows stakeholder review and feedback of DRAFT ANZAPAP document including all templates.

Summary of Key Changes Our concerns relate specifically to the detail of how this proposed process will be run and in particular the ramifications on the role of student feedback in the accreditation process with regards to the proposed removal of the Interim Review Panels (IRPs) and introduction of the Provider Annual Reports (PARs) [*Note see further comments included in Section 18 on IRP and Annual Reporting*]

In summary, we request the following action items are addressed;
   i. 'Key Next Steps in 2017' and 'Table 1' to be revised by the Development Group to include stakeholder consultation of the DRAFT ANZAPAP document including all templates. Current consultation pack is an outline of the process and contains insufficient information and detail for final student & graduate stakeholder feedback.
   ii. Procedural process of the proposed Provider Annual Report (PAR) to include key reporting item of independently sought student feedback on qualitative course outcomes (ie. student culture and wellbeing; facilities and resourcing of the course; course content changes and change management; quality, diversity and continuity of teaching staff). We recognise that comprehensive written student feedback would place an undue burden on student organisations to coordinate and deliver: therefore face-to-face meetings (in person or via the internet) are recommended. [*Note this point also included in Section on IRP and Annual Reporting*]

Architects Board of WA
Measurement of the New ANZ APAP Processes The Board queries how the revised ANZ APAP process will be measured? How will the stakeholders know if the revised process is working or whether it is more effective than the one it will replace?

BOAQ
Nil summary comments.

NSW ARB
The Board believes that accreditation continues to have a place in a rapidly changing tertiary environment. In particular, the promulgation of new national standards for higher education in Australia – the *Higher Education Standards Framework (Threshold Standards) 2015* (new HES Framework) - reinforces

the focus on quality standards in tertiary education. The new HES Framework applies for regulatory purposes from 1 January 2017. From this date, all registered providers of higher education in or from Australia must meet and continue to meet the requirements of the new HES Framework.

In broad terms, the Board sees the primary challenge of regulators is to maintain an adaptable mindset that is agile to shifts in technologies that may require adjustments in industry practice. The Board believes that institutions are valuable for the norms they foster, which enables industry to co-ordinate practices that are beneficial to the sector, to individual actors within the sector, and to consumers who seek access to like-for-like services. Applied well, regulation can reduce transaction costs, create opportunities for industry to demonstrate credibility, and deliver a public good.

Our approach to this Review
The perspective we have taken in this review is to consider matters purely from the perspective of what systems, processes and protocols are required to ensure a rigorous and tangible review of a course via the Review process.

We are aware that numerous factors (for example finance and politics) may influence the discussion on these points but we do not think them constructive or relevant. If the purpose of the accreditation procedure is to ensure a viable, quality and respected education of aspiring architects, this should be the lens through which the ANZAPAP review and feedback occurs, and it is this view which has guided our perspective.

With this in mind, the Board wishes to re-affirm a number of important principles that must be 'locked in' to the procedure, or in processes that are yet to be developed and may be intended to support the implementation of the procedure.

Finally, we should note that our approach and this response takes the view that the accreditation procedure actually does matter. Therefore, many of our comments relate to panel size, accreditation time, accreditation content and panel independence - most of which look to be reduced in the revised procedure. While we support the idea that some optimisations may be possible, a reduction in various aspects of the procedure suggests that the procedure itself is of reduced importance and should require reduced time and reduced effort. We are concerned by this tendency as it raises the question of the credibility of the procedure itself, particularly if no "absolute thresholds" are clarified.

1. *A joint procedure*
The Board recognizes that the tertiary education sector is a highly regulated environment, and that the Higher Education Standards Framework (Threshold Standards) 2015 provides the context in which the Boards operate as the relevant accrediting authority.

The Board – comprising representatives from across the built environment industry as well as law, local government, and the public interest – re-affirms the importance of ensuring a clearly defined role for all three key stakeholders in the accreditation process, including;
-   Education providers; including the universities themselves
-   Regulators; including the Boards, and the AACA as a wholly owned entity of the Boards
-   Practitioners; including architects that bring practical experience to the learning environment.

2. Expanding knowledge domains
[*Note that this comment has been included in Section 19 on the NSCA and Knowledge Domains*.]
This approach is relevant to Question 7 posed in the Review. [*Professional Advice*]

3. Communications strategy
The ANZAPAP has a proud heritage of being a joint procedure; shared by a constellation of practitioners, educators and regulators in each State and Territory, and New Zealand. The implementation of the procedure has historically drawn on the good faith collaboration of a wide array of educators, practitioners, regulators, students and others to participate, contribute and develop the procedures as common infrastructure in the sector. We also note the gradual diminution of forums in which issues related to education, practice and research can be advanced. For example, the Australian Institute of Architects withdrew its support for '*Archivision'* in 2010 while the Association of Architecture Schools of Australasia (AASA) announced in 2016 that its annual international conference would not be staged in 2017.

The Board believes that stakeholder engagement and communication are best thought of as a continuous and ongoing project. The Board recommends that work commence on an engagement and communications plan to share the process underway in a manner that is consistent with best practice. This may include;
- Opinion pieces authored by members of the Development Group to 'unpack' submissions received, and share insights in to how the Group balanced apparently competing data, positions or procedures
- Short videos or podcasts from university staff sharing how accreditation works
- Forums that share the feedback in order to build understanding and support for continual improvement in the implementation of the procedure.
- Map and communicate the diversity of Development Group membership that comprises senior practising architects, and academic members.

ARBV
In response to stakeholder feedback it is pleasing to see that the reworked proposal reinstates some of the quality assurance processes within the current procedures. The changes proposed are less onerous for schools but we remain concerned that the processes will result in a dumbing down of how schools address the delivery of evidence for accreditation. It seems that changes are linked more to efficiency drivers coming from schools and the secretariat rather than best practice in terms of accreditation processes.

Rational for change   Australasia's accreditation process is well known internationally for its rigour and is recognised through the Canberra Accord. The justifications provided in the rational over emphasise the need for change.
- We agree that governance and transparency around the purpose of accreditation will be improved by AACA management given accreditation is entirely concerned with the pathway to registration.
- Accreditation is an opportunity for stakeholders to engage in a rigourous process. The current procedural process is already predictable in that each step is prescribed. In terms of predicting outcomes, it is unreasonable to assume that outcomes should be predictable prior to the Panel process. However it is not unreasonable to assume that processes are replicable if a different Panel were to visit the same School. We are not aware of evidence that Panels are wilful in their examination and Schools have the opportunity to correct errors of fact.

- Current processes are internationally benchmarked. While processes for schools are more onerous that the streamlined RIBA processes, there are not more onerous than processes within many Canberra Accord recognised processes. The RIBA process is not connected to British registration of architects.

APBSA

How will online courses be accommodated? This model is getting traction, so does this require any different procedures?

AACA NAP

The NAP commends the Development Group for their work to this point.

Overall, the NAP supports the directions of the work done thus far in identifying the key components of the revised ANZAPAP.

The ANZAPAP should provide specific advice on the definition of the 'threshold 'standard to reduce the potential to conflate threshold with – minimum or minimal. The NAP considers that all levels of student work should be available to the accreditation panel (or a range of student work so as to enable panel to distinguish between low pass level work and 'threshold' standard work and to ascertain aspirations of program in relation to threshold knowledge and skills).

The introduction to the ANZAPAP documentation should reinforce commitment to the purpose of the ANZAPAP as being to allow a program to demonstrate achievement of the threshold standard without impeding innovative and quality architectural education. The streamlining of procedures should be presented in this framework in these terms rather than as simply cost cutting.

The ANZAPAP should include an articulation of the relationship between education and practice in the context of the requirements of accreditation of architectural programs as a legislative requirement on the pathway to registration as an architect.

Clarification is required regarding grievances lodged as a result of the conduct of the accreditation panel and an appeal mounted against a decision taken by an Architect Registration Board regarding the accreditation of a program.

The NAP notes that the timeframe for the implementation of the revised ANZAPAP was agreed by the AIA – AACA Liaison Group when the Development Group was formed in July 2016.

As per the terms of reference the NAP understands that the work of the Development Group finishes when they have considered the stakeholder feedback and forwarded to the owners by the end of May 2017.

The NAP also notes the advice from the ANZAPAP Secretariat forwarded to programmes due for a Visiting Panel this year that the 2017 Panels would conducted in accordance with the current procedure, and Accreditation Panel from 2018 onwards would be conducted in accordance with the revised procedure.

The NAP recommends that the revised Procedure come into effect 1 July with a period of transition from July 1 – 31 December 2017 to allow for the detailed development of reporting forms and templates to be

developed and tested with stakeholders, and the appropriately qualified members of the members Management Group and the Standing Panel to be appointed.

The NAP recommends that a Communication Strategy be prepared by the incoming Secretariat to explain changes, facilitate recruitment of appropriately qualified and experienced persons for the Standing Panel from which Accreditation Panel members are appointed.

Univ of SA
Nil summary comments.

Univ of Canberra
The following response to the Australian and New Zealand Accreditation Procedure (ANZ APAP) Review Stakeholder Consultation Pack, dated 8 March 2017, has been prepared by the University of Canberra, Faculty of Arts and Design, Architecture Program Team (Program). As a stakeholder, the Program welcomes the opportunity to contribute to this important review.
The Program makes the following first level comments:

- The Program endorses the position contained in the Association of Architecture Schools of Australasia Executive's letter of response, dated April 2017.

- There is insufficient information contained in the Pack to provide meaningful feedback. In particular, the absence of draft revised Procedures, referenced at several points in the Pack and implied to be in development, means that very little can be said about potential impacts on university curricula and in turn on the character of architecture education.

- Many of the new procedures, as implied in the document, seem single focused in their intention and effect. This is a concern as this would be a lost opportunity to keep the accreditation procedure productive and valued for its holistic, pedagogical, and rigorous conversations between the joint owners, the profession, and program providers. Architecture education should reflect the breadth of knowledge, critical thinking, and research-led skills called for by current and future architecture professionals and be reflective of international standards.

- It is a concern that the timetable and process stages (Table 1, page 4) imply that stakeholders (including the architecture programs delivery Universities) are not given the opportunity to review and comment on draft revised Procedures.

UNSW
Endorses the AIA NSW Education Chapter response.

Univ of Sydney
The two review documents to which these comments are a response --- the ANZAPAP Review Stakeholder Consultation Pack and the ANZAPAP Evidence Guidelines and Interpretation --- outline important and worthwhile changes to the accreditation procedure. In principle, the School supports these changes.

However the documents are open---ended and lack specific detail in several critical sections --- notably those related to fees and costs, and those related to guideline documents and templates. This has made the preparation of informed, useful comments difficult.

There is concern that, in such absence of detailed information, no further phases of consultation have been programmed into a schedule that is already very tight, if not unviable; presenting the School with a significant challenge for endorsement.

ANZAPAP Steering Committee

The new accreditation process is tightly framed around the requirements of the process for accreditation. The integration of reportage and procedural documentation to be completed by parties to the process will ensure the process remains focused. The SC agrees with the approach adopted but is concerned that it may have unintended consequences for the development of architectural education in Australia going forward.

The SC sees that much of the detail of the new procedure is contingent on the development of templates identified by the Stakeholder Report. The SC considers is it essential that before implementation of the new process stakeholders have the opportunity to comment on the development of these templates.

The capacity of the proposed accreditation procedure to be flexible in response to different program structures such as dual degrees, multiple strands, multiple BAPs, variable timelines is a positive attribute of the proposed procedure.

AASA

First, the AASA Executive does not feel it is in a position to make informed rigorous and detailed comment on the procedures due to the lack of detailed information contained within the consultation pack. The AASA Executive requests that a draft of the entire procedure and more comprehensive details of the costing model be circulated to the AASA and its members and that sufficient time and opportunities for genuine stakeholder engagement and feedback are provided as part of this review process. This is not currently reflected in the proposed timeline for implementation (Table 1, page 4), which does not include any further opportunity for review and feedback.

Second, the AASA Executive is concerned that the revised procedures do not address substantive feedback from the AASA and its members on the ANZAPAP Review 2015-16 Draft Report. We attach our initial feedback as outlined in our letter dated 27 May 2016 for your reference. Key issues highlighted in our previous feedback that are not considered in the information provided include:
-   The broader role of the ANZAPAP as a mechanism of peer review of quality of programs and the benefits of aligning professional accreditation procedures with other higher education reporting requirements (high level recommendation) and the related procedural issues regarding exhibition of work, panel size and length of visit (recommendations 7.0 c and g)
-   The workload and responsibilities of the Management Committee (recommendation 4.0)
-   The important role and purpose of the Preliminary Assessment Panel (recommendation 8.0)

Information contained in the consultation pack suggests that the proposed revised procedures represent a substantive reduction in the scope and intent of accreditation procedures towards a minimum compliance approach based exclusively on the National Standard of Competency for Architects (NSCA). Following consultation with members we are aware that there are differences of opinion with some institutions expressing a preference for accreditation procedures to be even more streamlined and restricted to a minimum compliance process. However, others have expressed grave concerns about this approach and the implications for the future of architectural education in Australia and international recognition of our programs. Adequate time and opportunities to debate and fully comprehend the

implications of this trajectory towards a minimum compliance process engaging key stakeholders, including all members of the AASA, needs to be provided.

Finally, the AASA Executive is concerned about the withdrawal of the Australian Institute of Architects from the Development Group. The AASA Executive consider the Institute to be an integral part of the accreditation process, contributing to a collegiate professional and academic architectural environment. Given this situation, and in light of the points raised above, the AASA Executive supports the continuation of the existing ANZAPAP procedures until the end of 2018 to extend the timeframe for development of new procedures and to provide greater surety to programs with scheduled NVPs and IRPs in 2017 and 2018.

ADBED

ADBED support in principle the ambitions of the review towards streamlining of the accreditation process through fewer panelists, a clearer and more focused agenda, and prior submission of report and digital evidence of student work. We applaud the spread of costs across the five years as a measure that better responds to the University budgeting process. We do, however, recognise that there is disagreement amongst members and stakeholder as to whether ANZAPAP is a mechanism of peer review of programs beyond NCSA competencies. We are disappointed that the AIA has withdrawn its support given that their representative members have been intimately involved in the review to this point. It is only through a tighter focus on compliance for accreditation that the process can be streamlined as proposed, hence the basic principle needs to be agreed ahead of the minor points that stakeholders have been asked to respond to during this consultation stage.

ACA

As the peak body representing employers of architects in Australia, with a mandate to advocate for "The Business of Architecture" the ACA is uniquely positioned to provide feedback to the AACA/AIA as Joint Owners of the ANZAPAP about the role, efficacy and status of architectural education in so far as it applies to graduates entering the workplace. For this reason, the ACA strongly supports the ongoing and rigorous Accreditation of Architectural Programs as a means of ensuring that the National Standards of Competency for Architects (NSCA) of the AACA are met.

The ACA National Executive thanks the AACA for the opportunity to provide this feedback after the closing date for submissions, and looks forward to ongoing dialogue and opportunities for engagement as the process proceeds.

NZRAB

Thank you for the opportunity to submit on this important issue. In principle the NZRAB:
- supports making the process less time consuming and expensive
- supports the concept of the Visiting Panel being fewer in number and that preliminary evaluation of the programme would be undertaken prior to the onsite visit, but notes that the quality of the documentation will be critical
- supports the removal of IRP's in favour of annual reporting.

The quality of the proposed process will likely hinge on the quality of the panel's evaluation of the programme prior to the visit. This documentation therefore needs to be adequate, and both time and resources available to support communication between the panel and the programme in advance of the visit.

The changes proposed are significant and both Chairs and panellists should undergo training for the application of the new system as it will require quite a different approach to evaluating the work. This may require a more precise set of benchmarks for bare pass work in each subject category.

AACA and AIA. Having consulted with NZIA, we note our concern about the AIA as a co-owner of ANZAPAP withdrawing support of the ANZAPAP Development Group. A collaborative and a co-owned accreditation procedure is beneficial for the profession and educators, and we would prefer that the member organisations supporting the professions (AIA, NZIA) are actively engaged and supportive of the changes.

Bruce Callow (WA)

As a former Chair of ABWA and former AACA NAP member, I was seconded back by the ABWA to assist them with the preparation of their response to the 'Stakeholders Comments' invitation on the final recommendations of the NAZAPA Review.

Generally I concur with the ABWA comments and their response as submitted. However, having previously made a separate submission, I are several issues where, as a NVP panel member, I think clarification is required as to how some matters are to be dealt with in relation to the material being presented to an NVP by course providers. These comments should not necessarily be taken as the view of the ABWA.

My comments below relate more specifically to the suggested *'Guidelines for Providers and Panel Members'* that were also included for stakeholder comment.   [*Note that detailed comments are included at Section 10 - Suggested Evidence Guidelines for Providers and Panel Members*.]

Overall, the outcome of the improved ANZAPAP process should be that there is a greater degree of standardisation, comparison and uniformity in how architectural education, the NCSA, accreditation and pathways to registration, are applied and all relate to each other, and at the same time relate to other university TLO's etc..

Ian Hamilton (QLD)

Some comments and observations which do not align with Table 9 – Specific Questions, as outlined in the Stakeholder Consultation Package. And my disclaimer for any ignorance on my part, is that is this is the first time I have been exposed to ANZAPAP documentation and procedures.

1. In Acronyms, the APE should read 'Architectural Practice Review' (p2);
2. As AACA Convenor for Queensland involved in Parts 1 and 3 of the APE, and noting the standard of candidate fronting up for registration, I sincerely doubt that Criteria 1-9 in Part II Assessment (p12), is being fully and completely provided by any of the Service Providers. My quick internet review of the architectural courses available in SEQ, revealed only one that outlined a course structure even close to that list. I would happily be proved incorrect in this observation. In fact, the ACA in Brisbane has set up a committee to review the shortfall in a candidate's education/experience, which is apparent when they front up for the APE.
3. Architects Registration Boards (ARB) does not appear in the Acronyms list (p13);
4. How do the ARB's approve the education courses (p13). Some further information and/or links would be appreciated, for my own benefit;
5. I would be interested in what training is available for 'standing members' (p15);
6. At what rate(s) are ARP members paid at? Considering that they are experienced and knowledgble Practitioners

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