



July 14, 2024

Re: Review of the proposed amendments to the PAB accreditation standards

Dear Planning Accreditation Board,

We hope this letter finds you well. Planners of Color Interest Group (POCIG) executive board is writing on behalf of the Association of Collegiate Schools of Planning (ACSP) POCIG membership to share our concerns and comments on the proposed amendments to the 2022 PAB Accreditation Standards and Criteria.

The POCIG mission is to advance the interests and concerns of people and communities of color within the planning academia and the profession. POCIG holds experience working with PAB for the two previous rounds of amendment to the standards. We have been closely following the current amendment process and appreciate this opportunity to comment on the first draft of the proposed amendments.

We understand that two recent events are driving the current amendment process: the Supreme Court's ruling on Harvard's affirmative action admissions policies and the spread of the anti-Diversity, Equity, and Inclusion (DEI) legislations passed by state legislatures such as Florida, Texas, Iowa, and North Carolina, among others. However, the specific nature and severity of the challenges faced by planning schools vary widely between states and even within states. Given the limited understanding of the nature and extent of challenges faced by planning schools, we believe PAB is overreacting to the potential threats of litigation where there is currently no precedent for accreditation board lawsuits. PAB should not operate from a position of weakness, and instead continue to align values with ACSP, APA, and AICP and maintain its integrity in pursuit of a just society.

Moreover, we find it highly concerning that PAB has not conducted a comprehensive analysis of how programs are affected by the affirmative action case and anti-DEI legislations. We have, in fact, heard from our stakeholders that PAB standards shield against the planning schools anti-DEI policies. This means that PAB needs to uphold and, preferably, strengthen its support for DEI values, and its commitment to bolstering the representation of historically underrepresented groups. We urge PAB to survey department chairs regarding the challenges they currently face or anticipate to face when going through the accreditation process and implementing DEI initiatives. Collecting data on this aspect would provide a clearer picture for the need and scope of the PAB amendments.

Given the lack of comprehensive information, POCIG has initiated a survey to collect data on the limitations faced by planning schools. Below, we summarize some of the key insights from the survey as well as a synthesis of the member comments on the proposed amendments. Two distinct areas frame our initial comments, (1) content of the proposed PAB amendments, and (2) the current amendment process.

### **Challenges faced by planning schools:**

When asked about whether they are facing any constraints related to collecting race and ethnicity data of their student body, our survey respondents indicated that:

- (31.3%): No race/ethnicity data collection constraints
- (49.9%): Race/ethnicity data collection allowed with caveats (e.g. only if PAB "requires it" [Florida]; can collect race/ethnicity data [Kansas])
- (18.8%): Race/ethnicity data cannot be collected

Moreover, we also asked if there are other DEI-related constraints imposed recently due to legislative bills. Below are some examples of what the survey respondents shared:

- Prohibits public institutions of higher education from, among other things, establishing or maintaining DEI offices or hiring or assigning officers, employees, or contractors to perform the duties of a DEI office.
- Prohibits any mandatory orientation or training courses regarding DEI, unless the state institution determines the orientation or course is required for certain specified purposes
- Prohibits academic and financial ties between Ohio's higher education institutions and those in China due to national security concerns unless certain safeguards are in place.
- Prohibits spending on DEI programs, restrictions on DEI, race, topics in Gen Ed
- Eliminates DEI offices, reduced spending, and requires reports from chancellors. It makes mention of policies that are harder to measure like institutional neutrality and preservation of debate.
- Prohibits public universities and colleges from requiring or considering statements in support of or against any political ideology, including diversity, equity, and inclusion, when considering the hiring or promotion of employees, or when considering student admission or financial aid.

A critical feedback that we've heard is that **the majority of planning schools are allowed to continue to teach and support DEI initiatives because of the PAB standards that require DEI to be incorporated in their curriculum.**

Our survey responses provide a glimpse of the current political and policy landscapes faced by planning schools. PAB should conduct a survey to gain a better understanding of the challenges and develop new standards tailored to specific constraints faced schools rather than excessively diminish DEI safeguards in existing standards.

## Content related comments:

We have four content related comments and requests:

### 1. Continue to require the incorporation of diversity in the curriculum

The proposed amendment removes the requirement that there are strategic goals in place to *“incorporate into the curriculum the knowledge and skills needed to serve a diverse society.”* The new language simply asks that the goals should *“reflect”* a program’s *“definition of diversity, equity, inclusion, and social justice”* and their efforts to *“advance and support this definition.”*

While POCIG supports expanding the language from referring only to *“diversity”* to include *“diversity, equity, inclusion, and social justice,”* we believe it is critically important to require that these values are *“incorporated into the curriculum.”* **We have heard from educators in Florida, Georgia, and Iowa that it is this instructional requirement that allows schools facing anti-DEI pressure from their state university systems to continue to teach and promote diversity in their programs.**

The removal of the instructional requirement is also found in the proposed amendment to Section 4. Curriculum and Instruction. The proposed amendment removes the requirement that the programs *“ensure”* that the fundamental ethical and normative principles such as DEI *“are embedded in a range of required courses.”*

Relevant sections:

- a. Section 1. Strategic Planning and Progress A. Strategic Plan, 3) Program Goals and Measurable Objectives of the Strategic Plan (page 3)
- b. Section 4. Curriculum and Instruction, A. Guiding Values (page 9)

### 2. Find creative ways to track and evaluate how planning programs are diversifying their student and faculty bodies

We understand that PAB has been instructed by legal counsel to move away from measuring outcomes related to race and ethnic diversity. In response, the proposed amendment completely removes the reporting requirement of student and faculty demographics data (Sections 2 & 3). However, as explicitly acknowledged in the current standard, which is poised to be removed, keeping track of such demographics is essential *“to inform and enhance”* the programs’ efforts *“to identify effective and appropriate methodologies for achieving diversity in its student body.”*

The proposed amendment simply asks programs to establish strategic goals that *“demonstrate efforts to attract a diverse student population,”* that they *“report the rationale for determining the program’s diversity goals,”* and that they *“provide evidence of activities and strategies intended to assist in achieving program student diversity.”*

How will the PAB site visit teams evaluate that such activities and strategies are adequate? How will the PAB site visit teams know that the program is making progress or not over the years? How will the PAB ensure that consistent standards are applied to assess the efforts to attract a diverse student population?

Our survey and conversations with stakeholders indicate that only a handful of schools are facing challenges regarding student data collection (18.8%) and none has seen any limits on faculty data collection. Moreover, even in places where student data on race and ethnicity cannot be collected during the admissions process, some schools are still allowed to collect such data to use internally or for accreditation purposes once the students are already admitted to the program (81.2%). Accordingly, we believe a complete removal of the data collecting and reporting requirements is unnecessary. **PAB should keep the data collection and reporting requirements, while developing modified standards that could be applied to institutions facing data collection challenges.**

**Moreover, beyond quantitative survey data, PAB can utilize a myriad of qualitative methods** to ensure that planning schools put their best efforts forward in diversifying their student and faculty bodies and hold them accountable. Our survey respondents suggested the following qualitative alternatives to assess DEI:

General department climate / assessment strategies

- Conduct regular department climate surveys and exit interviews
- Conduct focus groups with faculty and students to gather detailed insights into the DEI climate.
- Implement peer reviews where schools share best practices and challenges in DEI.
- Require narrative reports from programs on their DEI initiatives and outcomes.

Student diversity - recruitment and retention

- Conduct recruitment outreach efforts with HBCUs, MSIs, Tribal colleges and community colleges and other allied fields
- Institutions can seek attainment of HSI, or AAPI status
- Increase program visibility of DEI goals in communications, publications, workshops, etc
- Collect alumni employment status information through alumni exit interviews and surveys
- Conduct outreach through APA divisions, NOMA, and ACSP interest groups

Faculty Diversity – recruitment and retention

- Conduct recruitment outreach efforts at HBCUs, MSIs, Tribal colleges and community colleges and other allied fields
- Conduct recruitment outreach efforts through marketing available positions in APA Divisions, NOMA, POCIG, GPEIG, Inclusion, FWIG, etc
- Conduct surveys of faculty research areas / projects

These qualitative measures combined with quantitative data can provide a rigorous method to assess planning programs' commitment to diversity in a holistic and consistent manner.

Relevant sections:

- a. Section 1. Strategic Planning and Progress, A. Strategic Plan (page 3)
- b. Section 2. Students, B. Student Diversity, 1) Recruitment (page 5)
- c. Section 3. Faculty, B. Faculty Diversity, 1) Recruitment (page 7)

### **3. Provide a baseline definition of diversity and maintain inclusion of “underrepresented groups” in standards language**

PAB is proposing to remove “*underrepresented*” language in six sections, which in effect ignores the historical underrepresentation of students and faculty of color in planning schools. The planning academy and practice have historically struggled to recruit and retain diverse students and faculty. From 2008-2018 the percentage of Black and Latinx students increased from 7% to 11% and 8% to 14% respectively. While the numbers have improved in the last decade, there is still room for improvement (Sen, Edward, Forsyth, Lowe, Sandoval, et al. 2014; Planning Accreditation Board 2017a; 2016; 2019; Garcia et al, 2020, 2021). Under the proposed standard, planning schools would no longer have to demonstrate outcomes for racial and gender diversity in recruitment and retention of student and faculty bodies, and programs instead should “*promote diversity*” based on their own definitions of what diversity means. Many planning programs only do the work to integrate a diverse student and faculty body because PAB holds them accountable (PAB Diversity Taskforce, 2015).

The removal of “*underrepresented groups*” also contradicts the AICP code of ethics about increasing “opportunities for members of underrepresented groups to enter and succeed in the profession” (<https://www.planning.org/ethics/ethicscode/>). Instead of watering down language that removes DEI, race, and underrepresented groups throughout PAB standards, we urge PAB to provide a clear definition of DEI based on the [APA definition](#) and further expand it to include non-apparent characteristics (e.g. view points, first generation, familial status, socioeconomics, etc). Such an expanded definition would allow for planning schools to define diversity tailored to their local contexts, particularly for those schools facing race/ethnicity data collection restrictions. Our survey respondents also acknowledged the importance of assessing student diversity based on the contextual demographics of each planning school (68.8%). **Furthermore, allowing each program to determine their own metrics of compliance with DEI measures will result in inconsistent application of the standards, if any application at all.**

Additionally, the proposed amendment, Section 3, Faculty development, removes “*mentorship programs, support for research and teaching initiatives, and professional development opportunities*” for faculty from underrepresented groups. Similarly, Section 5 removes a commitment to support promotion and tenure of faculty from underrepresented groups. Planning schools are 8% Black faculty, 7.6% Latinx faculty, and 5% Asian faculty (Jackson et al, 2021). Our survey and conversations with stakeholders indicate that planning schools are not facing limits on faculty professional development activities. **Accordingly, we believe a complete removal of faculty professional development activities, mentorship, and relevant programming, which are crucial to promotion and tenure, is unnecessary. PAB should**

**maintain the current language for faculty professional development guidelines in Section 3 and 5.**

Relevant sections:

- a. Section 2. Students (page 5)
- b. Section 2. Students, B. Student Diversity, 3) Student support (page 5)
- c. Section 3. Faculty (page 7)
- d. Section 3. Faculty, B. Faculty Diversity, 3) Faculty support (page 7)
- e. Section 3. Faculty, G. Professional Development (page 8)
- f. Section 5. Governance, E. Promotion and Tenure (page 13)

**4. Clearly acknowledge the current and past structural injustices and the role planning has had in creating and perpetuating such injustices**

The proposed amendment changes Section 4, curriculum and instruction and removes language that acknowledges planning's continued role in structural racism. Although nuanced, this is an important distinction that is critical to maintain in Planning History and Theory curriculum to support efforts to redress harm that urban planning has and continues to cause.

Also, the proposed changes are inconsistent with the values and ethics of APA and AICP. In the wake of the murder of George Floyd in 2020 APA reaffirmed its commitment to create “great communities for all” (APA 2020a, 1). With the goal of recognizing and eradicating “the bad policy decisions of the past,” the APA statement also spoke about its diversity and inclusion efforts such as its [Planning for Equity Policy Guide](#), and the AICP Code of Ethics (APA 2020a, 1). **We believe PAB should maintain the original language stating clearly “how planning has advanced and hindered the attainment of justice, equity, diversity and inclusion, and social justice.”**

Relevant sections:

- a. Section 4. Curriculum and Instruction, B. Required Knowledge and Skills of the Profession, 1) General Planning Knowledge in Global Context (page 10)
- b. Section 4. Curriculum and Instruction, A. Guiding Values (page 9)

**Process Related Comments:**

We have two process related comments and requests.

First, we are deeply concerned that the PAB is soliciting comments over the summer when most of the planning educators are not on payroll. **We ask that PAB extend the participation process until after the upcoming annual ACSP conference in November to ensure a more robust and inclusive participatory process.** The ACSP conference has historically served as a platform for discussing key matters that will determine the future of planning education, such

as the proposed amendments, and PAB should not veer away from this tradition. Our survey indicates that 100% of survey respondents support hosting a PAB amendment comment session at the annual ACSP conference in November.

Second, we understand that one reason why PAB plans to move quickly with the amendment is to have revised standards in place for planning schools subject to reaccreditation in the spring of 2025. However, we believe an extended process and baseline survey is critical to get a handle on which institutions are facing pressing legislative challenges. Our survey indicates that 100% of survey respondents support extending the PAB review period until after the annual ACSP conference. Once this is done, PAB can better develop standards that can flexibly accommodate the variations across planning programs. To allow for sufficient time to revise the standards in a careful and thoughtful manner, **we ask that institutions with upcoming reaccreditations be granted extensions until PAB amendments are approved.**

In conclusion, because the upcoming PAB standards will shape planning education and practice for generations to come, we believe that a more extended and inclusive participation process, coupled with comprehensive data collection, is needed for amending PAB standards. Taking a more careful approach will ensure the standards are inclusive and align with ACSP, APA, and AICP values while also providing the necessary flexibility to adapt to evolving legal landscapes.

Thank you for considering our suggestions. We look forward to continued collaboration and dialogue to promote diversity, equity and inclusion in planning education.

Sincerely,

POCIG Executive Board

April Jackson, Co-Chair  
Danielle Rivera, Co-Chair  
Minjee Kim, Secretary  
Joel Mendez, Treasurer  
Joaquin Lopez Huertas, Student Representative