



# ACSP

Connecting educators,  
researchers and students

December 1, 2024

Weiping Wu, Ph.D.  
Chair, Planning Accreditation Board  
2334 W. Lawrence Ave, Suite 209  
Chicago, IL 60625

Dear Weiping,

Thank you for the opportunity to offer our comments and suggestions on the proposed amendments to PAB's 2022 accreditation standards. After having observed the listening session at the ACSP national conference in Seattle and reading the second draft of the proposed amendments, ACSP convened an ad-hoc committee to develop a response. This letter is the result of the work of the ad-hoc committee.

We sought assistance from the ACLU about what is legally defensible following the cases against Harvard University and the University of North Carolina and following anti-DEI legislation and executive orders. We also conducted a survey of department chairs and directors to understand the challenges they face in terms of collecting and using data on student and faculty demographics, and what limitations they face in enhancing the diversity of their student and faculty bodies. As a result of these efforts, we have an understanding of the current legal and policy landscape with regard to DEI in higher education.

We understand that: 1) data on race and ethnicity cannot be explicitly or exclusively used for hiring and admissions, but an applicant's past life experiences can be considered; 2) state anti-DEI bills are written to curb efforts deemed as "influencing the composition of" students and faculty; and 3) these bills often prohibit reserving or allocating resources exclusively for certain groups (examples that we know of include race and ethnicity, national origin, color, sex, sexual orientation, gender identity, gender expression, disability, and immigration status), but that these groups can be called out if it is also made clear that resources are open to everyone.

With regard to PAB's proposed amendments, we are most concerned with the following:

1. Removal of the requirement that programs collect data on student and faculty demographics, which was intended to:
  - a. "inform and enhance its [the program's] efforts to identify effective and appropriate methodologies for achieving diversity in its [the program's] student body" and
  - b. "establish assessment mechanisms for each of its [the program's] strategic goals that are focused on achieving diversity."
2. Removal of specific commitments in multiple parts to support students and faculty from "underrepresented groups," "women," and "racial and ethnic minorities".

In response, and considering the information we gathered, we are proposing the following changes to the proposed amendments. We believe our proposals do not unduly burden programs with new data collection requirements and address concerns about PAB maintaining its accreditation status, while strengthening the profession's and academia's commitment to serving a diverse society. Here are the highlights of our proposal:

1. **Define "Historically marginalized/underserved communities" in the strategic planning section** (See Exhibit 1).
2. **Move the current definition of diversity to the strategic plan section of the standards** (See Exhibit 2).
3. **Explicitly acknowledge the need to further diversity-related strategic goals and the continue to require programs to establish assessment mechanisms for achieving goals while giving schools flexibility in how they pursue such requirements** (See Exhibit 3).
4. **Explicitly use the term "Historically marginalized/underserved communities" throughout the standards to reinstate the need to support students and faculty from such communities** (See Exhibit 4).
5. **Use "intellectual diversity" as a means to achieve and maintain diversity of our student and faculty bodies because the term's association with academic freedom has consistently been protected by the courts** (See Exhibit 5).
6. **Programs provide facilities that are welcoming to all students, faculty, and staff** (See Exhibit 6).

Exhibits 1 through 6 contain our recommended language that reflects the points above. Our proposed text is **highlighted and is in red**. Text that is in **red** are PAB proposed additions. Text that is in **black and struck out** are PAB proposed deletions.

Thank you again for the opportunity to submit our comments and suggestions. We believe that at this moment PAB and planning programs need to strengthen our commitment to serving historically marginalized/underserved communities and to supporting students and faculty from such communities, not weaken it. We believe our proposals preserve the progress we have made, and offer a way forward to continue to diversify our student and faculty bodies to reflect the populations we serve, while complying with the Supreme Court ruling and state legislation and executive orders. We will be happy to meet with you if you would like further clarifications on our proposals.

Sincerely,



Rayman Mohamed, Ph.D.

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#### **Ad-hoc Committee Members**

Ivis Garcia, ACSP President-Elect, Associate Professor, Texas A&M University

Ed Goetz, Professor, University of Minnesota

April Jackson, Associate Professor, University of Illinois Chicago

Minjee Kim, Assistant Professor, University of California, Los Angeles

Jane Rongerude, Associate Professor, Iowa State University

## Exhibit 1.

### Section 1. Strategic Planning and Progress

A. Strategic Plan: The Program shall have a strategic plan for achieving its goals and objectives – either as a free-standing plan or part of a broader **unit's** departmental strategic plan – and must be able to demonstrate progress towards goal attainment. **The** Program must document active engagement in plan development by faculty, students, alumni, practitioners and any other key stakeholders the Program deems important to the process. Practitioners and other key stakeholders may include a broad spectrum of professionals who can be resources for the Program during plan development and implementation. The strategic plan shall include the Program's definition of diversity, equity, inclusion and social justice, ~~and goals and measurable objectives aimed at achieving them~~ **and shall highlight the Program's proposed efforts to advance and support this definition.** The strategic plan must include the following elements:

- 1) *Mission Statement*: The Program or the **unit** Department in which it resides shall have a clear and concise mission statement that expresses its core values and fundamental purpose and role in training professional planners.
  - 2) *Program Vision*: The Program or the **unit** Department in which it resides shall have a clear and aspirational long-term vision for change resulting from the Program's work.
  - 3) *Program Goals and Measurable Objectives*: The ~~Program's~~ strategic plan shall identify goals and measurable objectives that advance the Program's mission and vision. The goals shall identify ~~the Program's~~ future aspirations in the context of its mission and that of the University, and shall aim toward excellence beyond ~~that which~~ **what** may already exist. These should include strategic issues for the next 5-7 years and goals. ~~Goals shall reflect the Program's intent to achieve and maintain diversity, as defined by the Program, in its student body and faculty, and to incorporate into the curriculum the knowledge and skills needed to serve a diverse society.~~ **Goals shall reflect the Program's intent to achieve and maintain students and faculty from different backgrounds and with different perspectives that can promote intellectual diversity. The Program should incorporate into the curriculum the values, knowledge and skills needed to serve a diverse society including historically marginalized and underserved communities. Historically marginalized/underserved communities include, but are not limited to, cultural minorities, ethnic minorities, indigenous communities, rural communities, low-income individuals, LGBTQ+ people, people of color, people with disabilities, both visible and unsee, people with limited English ability, people with various political beliefs, people with uncertain immigration status, parolees, and older adults.**
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## Exhibit 2.

### Section 1. Strategic Planning and Progress

#### A. Strategic Plan

- 4) *Definition of Diversity:* Programs should include their definition of diversity in the strategic plan. Diversity is an inclusive concept which encompasses, but is not limited to, race, ethnicity, class, gender, age, sex, sexual orientation, gender identity, ability, educational attainment, first-generation status, spiritual beliefs, creed, culture, tribal affiliation, nationality, immigration status, political beliefs, and/or veteran status.
- 5) *Monitoring and Evaluation:* The Program, or the unit Department in which it resides, shall have a clearly defined approach, methodology, and indicators for measuring the Program's success in achieving the goals articulated in its strategic plan. The Program shall document how it tracks and assesses the results of the actions interventions and strategies.

## Exhibit 3.

### Section 2. Students

- B. *Student Diversity:* Diversity is an inclusive concept which encompasses, but is not limited to, race, ethnicity, class, gender, age, sex, sexual orientation, ability, educational attainment, first-generation status, spiritual beliefs, creed, culture, tribal affiliation, nationality, immigration status, political beliefs, and/or veteran status. The Program shall develop a holistic strategy that addresses the following elements:

- 1) *Strategic Plan:* Consistent with applicable law and institutional policy, the Program shall establish assessment mechanisms for each of its strategic goals that are focused on achieving and maintaining diverse students, as defined by the Program.

### Section 3. Faculty

- B. *Faculty Diversity:* Diversity is an inclusive concept which encompasses, but is not limited to, race, ethnicity, class, gender, age, sex, sexual orientation, ability, educational attainment, first-generation status, spiritual beliefs, creed, culture, tribal affiliation, nationality, immigration status, political beliefs, and/or veteran status. The Program shall develop a holistic strategy that addresses the following elements:

- 1) *Strategic Plan:* Consistent with applicable law and institutional policy, the Program shall establish assessment mechanisms for each of its strategic goals that are focused on achieving and maintaining diverse faculty, as defined by the Program.

#### Exhibit 4.

#### Section 2. Students

- C. Student Advising, Services, and Support: The Program shall provide students with competent academic advising, progress appraisal, and career guidance, as well as access within the institution to any personal counseling that students might need. Furthermore, the Program or its institution shall provide students with career services that assist students in securing suitable internships and jobs. The Program shall also support its students by providing them with financial aid opportunities that are sufficient in number and amount to achieve the Program's strategic goals for a well-qualified and diverse student body, including but not limited to mentorship and internship programs, fellowship programs, professional development programs and career services, and initiatives to support engagement in the profession. The Program shall demonstrate a commitment to supporting students from different backgrounds and with different perspectives, including students from historically marginalized/underserved communities, that can ensure intellectual diversity. The Program shall publish its criteria for the allocation of such financial aid.

#### Section 3. Faculty

- G. Professional Development: Faculty shall be provided opportunities to continue to develop themselves professionally. Work assignments and other development opportunities shall be such that skills in teaching, research, leadership, professional practice and other creative activities are sufficiently maintained and developed. Adequate resources shall be available to support faculty professional development, including training with respect to institution policies, teaching and communications skills, student needs, and the use of appropriate instructional technology, and topics such as implicit bias. Faculty, especially those from underrepresented groups, should, including those from historically marginalized/underserved groups, shall also be provided with opportunities to be mentored throughout their career.

#### Section 5. Governance

- E. Promotion and Tenure: The Program or its hosting unit shall publish policies and procedures for making decisions about the promotion and tenure of faculty. The Program shall provide support, including mentorship opportunities, for all faculty at the Assistant and Associate Professor (or equivalent) levels. The Program shall demonstrate that all faculty, including diverse faculty, are supported through The Program shall demonstrate a commitment to ensuring that women, racial and ethnic minorities, and members of underrepresented groups in academia have access to the mentoring, tools, and other support they need to advance professionally. The Program shall demonstrate a commitment to ensuring that faculty from historically marginalized/underserved communities have equal and fair access to such support.

## Exhibit 5.

### Section 2. Students

#### B. Student Diversity

- 2) *Recruitment*: Consistent with applicable law and institutional policy, the Program shall establish strategic goals that demonstrate an active commitment **efforts** to attracting a diverse student population **that progresses the strategic plan**, Programs ~~must~~ shall report how they are arriving at **the rationale for determining** their program's diversity goals, and determining what student populations, if any, are underrepresented in their Program. The Program shall collect and analyze data on student demographics to inform and enhance its efforts to identify effective and appropriate methodologies for achieving diversity in its student body. Furthermore, the Program shall establish assessment mechanisms for each of its strategic goals that are focused on achieving diversity. Because diversity is not a static concept, and because all planning programs should seek to improve the diversity of the graduates entering the profession, the Program shall provide evidence of activities and **strategies** programs intended to assist in **achieving student diversity goals attracting students from different backgrounds with different perspectives that can promote intellectual diversity**. along with specific diversity-related strategic goals that have been met.

### Section 3. Faculty

#### B. Faculty Diversity

- 2) *Recruitment*: Consistent with applicable law and institutional policy, the Program shall establish strategic goals that demonstrate an active commitment **efforts** to attracting a diverse faculty **that progresses the strategic plan**, The Program shall **report the rationale for determining diversity goals, and** collect and analyze data on faculty demographics in order to inform and enhance its efforts to identify effective and appropriate methodologies for achieving diversity among its faculty. Furthermore, the Program shall establish assessment mechanisms for each of its strategic goals that are focused on achieving diversity. Because diversity is not a static concept, and because all faculty representation within each planning program should seek to contribute to the diversity of the learning environment and improve the diversity of graduates entering the profession, the Program shall provide evidence of activities, **initiatives**, and **strategies** programs intended to **accomplish those goals: attracting faculty from different backgrounds with different perspectives that can promote intellectual diversity**. assist in achieving faculty diversity along with specific diversity-related strategic goals that have been met.

**Exhibit 6.**

**Section 4. Curriculum and Instruction**

**F. Facilities: Students, faculty and staff shall have access to sufficient physical resources and facilities to achieve the Program's mission and objectives. This includes facilities for instruction, student work, and offices, as well as facilities that are welcoming to all students, faculty, and staff.**

See also:

- Section 1. Strategic Planning and Progress, A. Strategic Plan, 3) Program Goals and Measurable Objectives
- Section 2. Students, C. Student Advising, Services, and Support