

September 21, 2006

To: Accreditation Director

From: Gerald Jakubowski, EAC Chair  
Mary Leigh Wolfe, EAC Chair-Elect

The purpose of this letter is to provide comments on behalf of the Engineering Accreditation Commission (EAC) of ABET, Inc. about the proposed changes to the General Criteria for Basic Level Programs published in Criteria for Accrediting Engineering Programs, Effective for Evaluations During the 2006-2007 Accreditation Cycle.

The Commission understands, and is supportive of, restructuring the criteria for consistency across the commissions. However, some of the proposed changes, while characterized as “editorial,” are substantive rather than merely editorial.

A particularly substantive proposed change is the addition of Criterion 4 (Assessment and Evaluation) and its interaction with Criteria 2 and 3. Specific concerns include the following:

- 1) Criterion 4 is repetitive of requirements in Criterion 3 (Outcomes). Since Criterion 3 still has the same language about assessment and evaluation as it had previously, the new Criterion 4, focusing on assessment and evaluation, seems to elevate those aspects of accreditation to a higher level. If that is the intent, this is a substantive change.
- 2) It would not be possible to have a finding for Criterion 4 about outcomes without a similar finding for Criterion 3. This unnecessarily reinforces a shortcoming and is not in the spirit of continuous improvement.
- 3) While Criterion 4 focuses on assessment and evaluation, Criterion 3 requires programs to demonstrate that its students attain outcomes. How can a program demonstrate student attainment of outcomes without assessment and evaluation? This has great potential for confusion among both programs and program evaluators. EAC team chairs and evaluators, as well as ABET staff, have devoted untold effort in convincing programs that the only way to demonstrate outcomes is through proper assessment and evaluation.
- 4) The language in Criterion 4 is not consistent with the language in the other criteria. The word “must” does not appear in Criterion 4. This could lead to confusion about requirements.

The likely confusion as a result of adding Criterion 4 without changing Criterion 3 will lead to inconsistency in application of criteria. We have experienced inconsistency in implementing the outcomes-based criteria over the past eight or nine years and continually work to eliminate inconsistency.

We are interested in working with the other commissions to develop restructured criteria to provide consistency across the commissions. When restructured criteria are approved, it will be very important to ABET’s constituents, including institutions and volunteers, that the Self-Study Questionnaire be revised to be in synch with the criteria.

We also offer a few editorial corrections (some apply to current general criteria as well): (1) Criterion 1, change “student’s” to “students”; (2) Criterion 3, last sentence, change “education” to “educational”; and (3) Criterion 5, first sentence, change “curriculum” to “curricular” and, in the sentence just before the bulleted part, change “professional component” to “curriculum.”

xc: EAC commissioners  
Accreditation Council