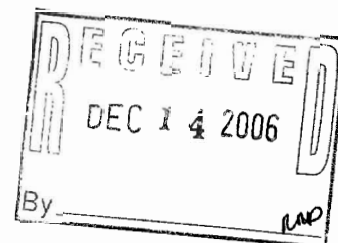


December 11, 2006

Dr. Richard C. Seagrave
President, 2005-2006
Accreditation Board for Engineering and Technology
111 Market Place, Suite 1050
Baltimore, MD 21202-4012



Subject: Comments on Elimination of Dual Level Prohibition

Dear Dr. Seagrave:

The American Academy of Environmental Engineers (AAEE) has a long history of support for advanced level accreditation of engineering programs. Currently, ABET lists seven environmental engineering programs accredited at the advanced level in addition to the forty-seven environmental engineering programs accredited at the basic level.

We understand that the EAC prohibition against accreditation of dual level accreditation of programs carrying the same title at single institution arose in the early 1980's when ABET criteria were very prescriptive. The prohibition was intended to protect engineering graduate and research programs from the kind of prescriptive constraints contained in the Criteria at that time. However, the current ABET Criteria 2000 are outcomes focused and much less prescriptive. We believe that the dual level prohibition is no longer necessary and no longer acts to serve the engineering profession.

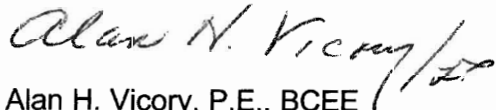
At the fall 1999 ABET Board meeting, the AAEE representative to the ABET Board of Directors moved that the Board ask EAC to review the dual level prohibition policy. This motion was seconded by an ASCE representative and generated some heated debate, but the motion was tabled with the understanding that the Deans' Council was planning to look into the dual accreditation issue. Now, six years later, with EC2000 fully implemented, the National Academy of Engineering (NAE) has recommended that engineering programs should be accredited at both the BS and MS levels.

Some engineering educators feel that if the dual level prohibition is removed, market pressure will force widespread accreditation of engineering masters programs. These educators are concerned that ABET advanced level criteria may be overly prescriptive and that the institutional work load related to accreditation will greatly increase. The newly proposed ABET advanced level general criteria clearly provide freedom for advanced level programs to establish educational objectives and to define the area of specialization. The institutional work load will be increased, but as pointed out by Ernest Smerdon (Smerdon, E.T., "Time for a Change" ASEE Prism, summer 2005, page 84) the cost and effort would be much less than double because of significant overlap between the self studies and because a single Program Evaluator could handle accreditation of a program at both levels.

Finally, ASCE, AAEE, ASME and other engineering societies are working toward defining Bodies of Knowledge appropriate to their respective engineering specialties. ASCE's Policy 465 on academic prerequisites for licensure and professional practice states that admission to the practice of civil engineering at the professional level requires attainment of a Body of Knowledge through appropriate engineering education and experience. The educational component consists of a baccalaureate degree plus a masters degree or equivalent. Likewise, the NAE (Educating the Engineer of 2020: Adapting Engineering Education to the New Century, 2005) recommended that engineering programs should be accredited at both the BS and MS level so that the MS degree can be recognized as the engineering "professional" degree.

In conclusion, AAEE strongly concurs with the recommendation of the National Academy of Engineering that engineering programs be accredited at both the baccalaureate and masters levels. This will require that the ABET EAC prohibition against dual level accreditation be reviewed and abolished. We feel that this is an urgent matter and look forward to prompt action by EAC and the ABET Board of Directors.

Sincerely yours,

A handwritten signature in cursive script that reads "Alan H. Vicory". The signature is written in black ink and is positioned above the typed name.

Alan H. Vicory, P.E., BCEE
President
American Academy of Environmental Engineers