

# PLANNING/COMMUNICATIONS

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AICP Commission  
1776 Massachusetts Avenue, Northwest  
Washington, DC 20036

## Re: AICP Certification Maintenance Proposal

Dear AICP Commissioners:

Most likely you're well aware that I strongly support voluntary continuing education for planners and have long opposed coerced mandatory continuing education or training. My guess, though, is that you've never actually listened to the reasons why, and have no idea of how much I share your stated concern that "planners should possess the knowledge and skills necessary to remain current in the practice of planning."

On the assumption that there is a collective open mind on the AICP Commission, I'd like to briefly explain those reasons to you now and then briefly discuss some of the flaws in the "Certification Maintenance" proposal the Commission proffered last month.

As my wife, who has been an educator for decades and is currently Managing Director of the Cross City Campaign for Urban School Reform, keeps reminding me, educators are very much aware that *forced education for adults just doesn't work*. Actual learning rarely takes place when adults are coerced into taking continuing education or training.

And indeed, during all this discussion of mandatory continuing education, which the Commission now dubs "Certification Maintenance," proponents of mandatory continuing education have been unable to produce actual evidence that mandatory continuing education results in great competence. No evidence has been put forth, for example, that engineers, architects, landscape architects, or attorneys in states that require continuing education are more up-to-date in their professional knowledge and skills or more competent than engineers, architects, landscape architects, or attorneys in states that do not mandate continuing education.

Now at any zoning hearing, the proponent has got to put forth evidence that proves its case. There is no reason that the proponents of "Certification Maintenance" shouldn't have to also produce evidence to prove their case.

I hope you can understand that while I share the Commission's desire for planners to be current and competent, actual factual evidence that support the arguments for mandatory continuing education, or whatever you want to call it, have not been submitted to the planning community. All there has been is a lot of arguing. Like any good planner, I want to see the facts.

And I hate to have to raise what should be the threshold question, but is there any evidence that AICP planners are not keeping current on their own, taking continuing education and training when, in their personal judgment, they need it?

So far, no such evidence has been put forth. **If the Commission needed a special use permit to impose “Certification Maintenance,” no zoning board could legally award that permit.** It really does seem that the Commission is proposing a solution in search of a problem.

While the Commission’s proposal didn’t discuss it, I have often heard that we need mandatory continuing education to win the public’s confidence. But again, no evidence has been proffered that the public holds engineers, architects, landscape architects, or attorneys in higher regard in states that mandate continuing education than in states that do not mandate continuing education.

**We should, of course, apply sound planning principles and practice to the governance of the institute charged with certifying planners.** And those sound planning principles and practices demand that the proponents of something like “Certification Maintenance” put forth actual evidence that there is a problem to be solved in the first place, and that there is a nexus between their proposed solution and an actual cure of the problem.

*So far, the Commission has not offered evidence that AICP members are not keeping current on their own or that they are, by and large, incompetent planners. Nor has the Commission presented any evidence demonstrating any nexus between mandatory continuing education and increased competence in a profession or greater currency of professional knowledge and skills.*

Absent that evidence, an AICP Commission that wishes to govern in a rational, ethical, and sound manner has no choice but to withdraw its proposal for Certification Maintenance or any other form of forced continuing education or training.

This specific proposal seems to ignore the findings of the trial program designed by the Chapter President Council a few years ago that found the cost of administering a mandatory continuing education to be prohibitive. I imagine that some members of the Commission may think that the fees AICP charges providers for their offerings to be sanctioned by AICP and the fees charged members to attend AICP-sponsored programs will more than cover the costs of administration. I strongly urge you to be realistic and get some really careful analysis conducted by unbiased parties. Based on the experience of your colleagues on the CPC, it is hard to believe that a substantial dues increase could be avoided if the Commission insists on imposing this “Certification Maintenance” proposal.

The proposal gives no hint as to how the Commission would assure the quality of continuing education offerings that it sanctions. Anybody who pretends that all the sessions at an APA national or chapter conference are of high quality is kidding herself. What does the Commission intend to do to assure quality in the continuing education programs it sanctions for credit?

The Commission’s proposal grossly understates the cost of continuing education and training that is not offered nearby. It ignores the costs of attending a chapter or national conference — in addition to registration fees, attendees must pay travel costs, lodging, and dining costs — costs that usually far exceed registration fees. Self-employed planners also lose income while at a conference (and please do not pretend that they make it back with consulting jobs they land from attending the conference — there’s no evidence to support that contention).

Setting 48 as the number of hours to be completed every two years appears to come out of left field. Maybe the crafters of the proposal figured they could propose such an inexcusably high number and then reduce it and say they are compromising. Come on, folks, nobody is going to buy that.

By now you've probably heard from plenty of us who faced mandatory continuing education in another profession, that 48 hours far exceeds what's required in other professions as well as defies rationality. And what about dual professionals? Let's see, as an attorney in Illinois, I am now required to take 30 hours of continuing education over a two-year period to retain my license. Add in AICP's 48 hour requirement and I'm not only out more than two weeks of earnings from work, but the incredibly high fees for 78 hours of continuing education. By the way, there is simply no evidence that the quality of Illinois attorneys has improved since mandatory continuing education was imposed at the behest of the bar associations that stood to make the most money from it; nor has the public's disrespect and dislike of attorneys been reduced.

I suppose that it could be argued that by not disclosing how much money the AICP Commission expects to make thanks to "Certification Maintenance," the Commissioners may very well be violating the conflict of interest provisions of the AICP Code of Professional Responsibility. I'm not going to make that argument here — I would like to think that generating income for AICP, APA, and its chapters, is *not* a reason the Commission has put forth this proposal. But from the scuttlebutt I've heard, you should be aware that many members feel there is an appearance of impropriety on the part of the AICP Commission.

I realize we've entered a day and age where people are looking for shortcuts. Rather than have their actual work scrutinized, they would prefer to have a set of initials after their names and claim that certification indicates they are competent. But as AICP's *Spencer Report* has long pointed out, licensing, for example, can at best screen out only the grossly incompetent. Plenty of incompetent people get licenses as doctors and attorneys, for example. There are even incompetent licensed architects and engineers who fulfill continuing education requirements each year. But there has been no evidence put forth that coercing people to take training assures competency or currency in planning skills and knowledge.

May I be so bold as to suggest that the Commission not rush to a decision. You have put forth a concrete proposal that I imagine has stirred up a fair amount of reaction, pro and con. To apply sound planning principles of full citizen participation, the Commission should begin a year-long process of soliciting member views, gathering evidence to support its contention that mandatory continuing education actually does improve competence and currency in professions, and, if it can prove its case, then put forth a better-crafted, more realistic proposal for the AICP membership to review.

Thank you for your time and consideration. I would be happy to provide any additional information you may need.

Sincerely,



Daniel Lauber, AICP

AICP President, 1992–1994, 2003–2005

APA President, 1985–1986