

CALIFORNIA ARCHITECTS BOARD

FINAL STATEMENT OF REASONS

Subject Matter of Proposed Regulations: Experience Evaluation

Section(s) Affected: Section 117 Article 3 of Division 2 of Title 16 of the California Code of Regulations (CCR)

Updated Information:

The Board's Experience Evaluation regulatory proposal was originally approved by the Board at its December 1, 2023 meeting. The Notice documents were published by the Office of Administrative Law (OAL) on April 19, 2024.

The 45-day public comment period closed on June 4, 2024, and the Board received no comments.

However, during further review by Board staff, the proposed language was modified to clarify the required experience-based internship program that would satisfy the experience requirement under CCR 117(A)(11) and the minimum amount of credit that could be earned upon completion of the program. This provides further clarity to candidates by identifying the type of program required. The language is modified to strike the proposed "experience-based program", add "Architectural Experience Program (AXP)" and add the additional clarifying statement "Completion of either program" prior to the statement, "shall be granted a minimum of three years credit, upon receipt in the Board office."

The Board reviewed and approved the modified language at its June 6, 2024 meeting and the notice of modified text was published and the comment period began on June 11, 2024. The comment period ended June 26, 2024 with no comments being received.

Summary of Purpose and Rationale for Additional Changes

The following lists changes that were made to the initial proposed language that were inadvertently not included with the Initial Statement of Reasons:

- Subsection (a), paragraph (3) added "or a degree from a university or college which has an NAAB-accredited or CACB-accredited professional degree program in architecture where the degree could be accepted for entry into a two-year NAAB-accredited or CACB-accredited Master of Architecture program" which was text from the former subsection (a) paragraph (4). This addition was made in the initial proposed text in order to provide clarity, consistency within the section, and to remove redundancy since this paragraph covers what was in the former subsection (a) paragraph (4). Additionally, a non-substantive change was made from "school" to "university" for consistency throughout this subsection.

- Although it was in the initial proposed text, the ISOR did not specifically identify, Subsection(b)(1), former subparagraphs 1, 3 and 4 are being re-lettered as A, B, and C, respectively. This is being done for clarity and to conform with traditional structure for subparagraphs being lettered, not numbered.
- Under subsection (b), paragraph (7) the amendments renumber (14)(A) to (8) for consistency within the subsection and language that refers to the updated location in the table.
- Under subsection (b), paragraph (10) the word “Professional” was inadvertently missing from the description of Item 36 of the Initial Statement of Reasons. “Professional degrees” is being struck and replaced with “units” to alleviate any confusion as this paragraph deals with units gained toward a degree, and not a degree itself.
- Subsection (c) paragraph 2, subparagraph (B) modified the structure to clearly indicate the second and third paragraphs relate to subparagraph (B).

The following lists non-substantive changes that were made to the language after public comment periods:

- Subsection (a) paragraph (15) added “(U.S.)” for clarity and consistent use throughout the section.
- In Subsection (b) paragraph (10), the last word of the last sentence was inadvertently struck and replaced with “units.” This has been unstruck, removed “units” and correctly reverted back to the original use of the word “degree.” The word “degree” should remain in the text for clarity to have the submitted foreign degree units relate to units from a comparable U.S. degree.

Local Mandate:

A local mandate is not imposed on local agencies or school districts.

Fiscal Impact:

The proposed regulations do not result in a fiscal impact to the state.

The Board currently regulates approximately 22,000 licensed architects and 10,000 applicants who are in the process of meeting examination and licensure requirements. The proposed regulatory action only affects candidates applying for issuance of a license. The Board does not anticipate an increase in workload because this regulatory proposal does not impose any new requirements. This regulatory proposal clarifies the existing application process and the required documentation for reciprocity architecture license candidates. The Board does not anticipate additional workload or costs resulting from the proposed regulations.

Anticipated Benefits

The anticipated benefits of this regulatory proposal are: aligning with the national standards to facilitate licensure, expand methods of gaining experience, clarify how candidates can gain experience, make requirements consistent for all applicants, and remove outdated language.

Consideration of Alternatives:

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which it was proposed or would be as effective and less burdensome to affected private persons than the adopted regulation or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

Objections or Concerns Received During 45-Day Public Comment Period and Board Responses:

No comments were received regarding the proposed action during the 45-day public comment period. Therefore, no comments were considered by the Board and no changes to the text were deemed necessary in response.

Objections or Concerns Received During 15-Day Public Comment Period and Board Responses:

No comments were received regarding the proposed action during the 15-day public comment period. Therefore, no comments were considered by the Board and no changes to the text were deemed necessary in response.