

DEPARTMENT OF CONSUMER AFFAIRS
CALIFORNIA ARCHITECTS BOARD
FINAL STATEMENT OF REASONS

Subject Matter of Proposed Regulations: This final statement of reasons addresses the regulations applicable to Re-Examination.

Section(s) Affected: Section 120 Article 3 of Division 2 of Title 16 of the California Code of Regulations (CCR)

Updated Information:

The Informative Digest and Initial Statement of Reasons are included in the rulemaking file and incorporated as though set forth herein.

The California Architects Board (Board) staff noticed the proposed rulemaking with a 45-day comment period ending on Monday, December 30, 2024. The Board received one comment during the comment period. There were no requests for a public hearing and no separate public hearing was held.

Local Mandate:

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

Consideration of Alternatives:

The Board has determined that no reasonable alternative to the regulatory proposal considered by the Board or otherwise identified and brought to its attention would be either more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons, and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with the law being implemented or made specific.

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

The following objections or concerns were received regarding the proposed action during the 45-day public comment period. All comments were considered by the Board; and no changes to the text were deemed necessary in response. The summarized comments and Board responses are as follows:

Summary of Comment:

Mr. Johnson commented that the governing of ARE without the Board's regulation will be unclear. Specifically stated that the deleted items do not have a solution "except to adhere to some nebulous 'national' standard for NCARB exams." He proposed the

Board needs to have its own rules related to the ARE and not defer them.

Response to Comment: The Board's regulations in this area currently conflict with the National Council of Architectural Registration Board's (NCARB) rules related to the Architect Registration Examination (ARE), which are further explained in the [ARE Guidelines](#). By striking this section of the regulation, candidates would follow instructions relating to examination scheduling, rescheduling, receiving scores, and examination validity as contained in the ARE Guidelines. The Board's current methods as outlined in the regulation are more restrictive to candidates. This proposal will remove the Board from dictating policies that tend to shift with greater speed than regulatory change will allow for. Additionally, the Board is actively involved in the discussions with NCARB when changes such as this are proposed on a national level and votes to approve changes of this nature during annual NCARB meetings.

On February 20, 2025, the written public comment was presented to the Board Members. The Board Members addressed the written public comment and agreed that the concerns expressed were addressed in the initial statement of reasons. For this reason, the Board agreed to proceed without making any changes to the text.