

**STATE OF CALIFORNIA – DEPARTMENT OF CONSUMER AFFAIRS
CALIFORNIA ARCHITECTS BOARD
INITIAL STATEMENT OF REASONS**

Hearing Date: February 22, 2011

Subject Matter of Proposed Regulations: IDP Guidelines

Section Affected: Title 16, California Code of Regulations (CCR), sections 109, 117 and 121

Specific Purpose of the Regulation

§ 109 – Filing of Applications

The existing regulation references three different intern development programs required by the Board (in two different subdivisions) for new and inactive candidates, including those who are licensed as architects in a qualifying foreign country. The programs referenced are the National Council of Architectural Registration Boards' (NCARB) Intern Development Program (IDP), Canada's Internship in Architecture Program (IAP); and the Board's Comprehensive Intern Development Program (CIDP). This proposal would: 1) clarify and provide consistency with how the programs and applicable guidelines/program editions are listed in subdivision (b)(2); and 2) simplify the references under subdivision (b)(7) by referencing the programs contained in subdivision (b)(2).

Specific Purpose of the Regulation

§ 117 – Experience Evaluation

Subdivision (c)(8) of the regulation provides the IDP entry point requirement and subdivision (e)(2) references IDP and IAP, as it pertains to the training experience exemption for those candidates who are certified as having completed either program. This proposal would: 1) delete the IDP entry point requirement language under subdivision (c)(8), as the requirements have been revised by NCARB to be less restrictive for candidates and are referenced in the applicable IDP Guidelines; and 2) simplify the references under subdivision (e)(2) by referencing the programs contained in subdivision (b)(2) of CCR section 109.

Specific Purpose of the Regulation

§ 121 – Form of Examinations; Reciprocity

Subdivision (a)(2) of the regulation references IDP and IAP, as it pertains to one of the programs required for reciprocity candidates. This proposal would simplify the references under subdivision (a)(2) by referencing the programs contained in subdivision (b)(2) of CCR section 109.

Factual Basis/Rationale

The Board is mandated to protect the public health, safety, and welfare. Like all regulatory programs under the Department of Consumer Affairs, the Board is allowed to make determinations on what is required of applicants to become eligible for a professional license. Currently, the regulations reference three different intern development programs required by the

Board. The Board is proposing amendments which would clarify, simplify, and provide consistency with how the programs and applicable guidelines/program editions are referenced in the regulations.

Underlying Data

The Board relied on the following documents in its proposal:

1. IDP Guidelines, 2003-2004 edition
2. IDP Guidelines, 2005-2006 edition
3. IDP Guidelines, 2007-2008 edition
4. IDP Guidelines, October 2010 edition

Business Impact

The proposed regulatory action will not have a significant adverse economic impact directly affecting business, including the ability of California businesses to compete with business in other states, because it affects only architect applicants.

Specific Technologies or Equipment

This proposed regulatory action does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private person than the proposed regulations.