

# CALIFORNIA ARCHITECTS BOARD

## INITIAL STATEMENT OF REASONS

Hearing Date: May 12, 2014

Subject Matter of Proposed Regulations: Intern Development Program (IDP) Guidelines

Section Affected: Title 16, California Code of Regulations (CCR), Section 109

### Specific Purpose:

1. Problem being addressed: The National Council of Architectural Registration Boards (NCARB) has released a revised edition of the IDP Guidelines (Guidelines), and the regulations need to be modified to reflect this update.
2. Anticipated benefits from this regulatory action: This proposal would update the edition of the Guidelines referenced in regulation to December 2013. This action would reduce any confusion as to which edition of the Guidelines candidates must adhere. The revised Guidelines include reducing the minimum employment duration requirement and easing the restriction on when interns could begin reporting IDP work experience.

### Factual Basis/Rationale

The Board is mandated to protect the public health, safety, and welfare, and like other regulatory programs under the Department of Consumer Affairs (DCA), is authorized to establish eligibility requirements for applicants of a professional license.

Pursuant to Business and Professions Code (BPC) Chapter 3, Division 3, section 5552.5, the Board is authorized to implement an intern development program. California Code of Regulations, Title 16, Division 2, section 109 clarifies BPC section 5552.5 and specifies IDP as the intern development program required of candidates.

IDP is a program that ensures candidates receive training in all aspects of architectural practice, and is required prior to licensure throughout the United States (US). NCARB, the national architectural organization that develops and administers IDP, has revised the Guidelines easing restrictions that were previously in place for candidates documenting work experience.

The first change eliminates the minimum employment duration (15 hours per week for 8 consecutive weeks) requirement and allows interns to earn IDP experience credit for valid work performed relative to an experience area. This includes periods of work performed while in school, over school breaks, and projects of limited scope with completion time in weeks.

The second change modifies the entry point to IDP to coincide with when an intern receives a US high school diploma or the equivalent. Formerly, interns were required to be:

- Enrolled in a degree program accredited by the National Architectural Accreditation Board (NAAB) or the Canadian Architectural Certification Board (CACB), or
- Enrolled in a pre-professional degree program at a school that offers a NAAB/CACB accredited degree program, or
- Employed in Experience Setting A after first obtaining a US high school diploma, General Education Degree equivalent, or comparable foreign degree.

### Underlying Data

The Board relied on the following documents in its proposal:

1. IDP Guidelines, December 2013 Edition

### Business Impact

This regulation 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.

### Economic Impact Assessment

This regulatory proposal will have the following effects:

- It will not create or eliminate jobs within the State of California because it only affects the reporting requirement of architect applicants, and the effect is insufficient to create or eliminate jobs.
- It will not create new business or eliminate existing businesses within the State of California because it only affects architect applicants who are not yet licensed to practice architecture, and there is no indication that any businesses will be affected.
- It will not affect the expansion of businesses currently doing business within the State of California because it only affects architect applicants who are not yet licensed to practice architecture, and there is no indication that any businesses will be affected.
- This regulatory proposal does not affect the health and welfare of California residents because the proposed regulations only affects architect applicants' reporting requirement.

- This regulatory proposal does not affect worker safety because it is not related to worker safety in any manner.
- This regulatory proposal does not affect the state's environment because it is not related to the environment in any manner.

#### Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

#### Consideration of Alternatives

No reasonable alternative to the regulatory proposal would be either more effective in carrying out the purpose for which the action is proposed or would be as effective or less burdensome 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.

One alternative is to keep the status quo, but if the Board does not adopt the proposed amendment, candidates completing IDP would be referring to an obsolete edition of the Guidelines and may not receive credit they would be entitled. This would cause an adverse delay the in completion of IDP, and subsequently licensure.