

CALIFORNIA ARCHITECTS BOARD

INITIAL STATEMENT OF REASONS

Hearing Date: November 23, 2015

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

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

Specific Purpose:

Section 109 – Filing of Applications

1. Problem being addressed: The National Council of Architectural Registration Boards (NCARB) has published a new edition of the IDP Guidelines that reduces the total hours required to complete IDP. Action is required to bring the Board's regulations into alignment with the revised Guidelines.
2. Anticipated benefits from this regulatory action: The proposed regulatory amendment will update the edition of IDP referenced in CCR 109 to the July 2015 edition. The proposed regulatory amendment will prevent any confusion as to which edition of the Guidelines candidates must adhere. The revised Guidelines eliminate the elective hour requirement for completion of the program, thus allowing candidates to complete IDP in a shorter amount of time.

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.

Through Business and Professions Code (BPC) Chapter 3, Division 3, section 5552.5, the Board is authorized to implement an intern development program. CCR, Title 16, Division 2, section 109, clarifies BPC 5552.5 and specifies IDP as an acceptable intern development program.

IDP is a program that exposes United States (U.S.) architect applicants to training in all aspects of architectural practice. IDP is required prior to licensure in most of the U.S. NCARB, the organization that develops and administers IDP, revised the Guidelines to reflect a reduction in the required hours for completion of the program.

The proposed regulatory amendment eliminates 1,860 elective hours of IDP, reducing the total hours required for completion from 5,600 to 3,740 core hours. The edition of the Guidelines currently referenced in CCR 109 is obsolete. Candidates referencing the obsolete edition of the IDP Guidelines will be recording more hours than required, and may face an unnecessary delay in licensure.

Underlying Data

None

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 candidates for examination and licensure, which has no effect on business or bearing on competitiveness. These candidates are already in the process of becoming licensed and therefore will neither encourage nor discourage those seeking an architectural license.

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 for applicants pursuing an architect license, 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 the reporting requirement for applicants pursuing an architect license, 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 the reporting requirement for applicants pursuing an architect license, and there is no indication that any businesses will be affected.
- This regulatory proposal benefits the health and welfare of California residents by ensuring architect applicants follow the current nationally accepted standard of intern development and receive training accordingly.
- 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 program. This would cause an adverse delay in completion of IDP, and subsequently licensure.