

**State of California  
Department of Consumer Affairs  
California Architects Board**

**INITIAL STATEMENT OF REASONS**

**Hearing Date:** September 28, 2011

**Subject Matter of Proposed Regulations:** Comprehensive Intern Development Program (CIDP)

**Section(s) Affected:** Title 16, California Code of Regulations (CCR), sections 109, 116, 117, and 121

**Specific Purpose of each adoption, amendment, or repeal:**  
**§ 109 – Filing of Applications**

The existing regulation language in CCR section 109 subdivisions (b)(2) and (b)(3) specifies that a new or inactive candidate applying for eligibility shall, prior to licensure, complete a board-specified documentation requirement, the Comprehensive Intern Development Program and submit such CIDP documentation to the Board as specified within subdivision (b)(3). This proposal removes the 1) requirement to complete CIDP and submit documentation related to CIDP to the Board; and 2) reference to CIDP in subdivision (b)(7).

**§ 116 – Eligibility for Examination**

The existing regulation language in CCR section 116 subdivision (b)(2) specifies that a candidate must, as a condition of eligibility for the California Supplemental Examination (CSE), complete CIDP. This proposal removes the requirement to complete CIDP as a condition of eligibility for the CSE.

**§ 117 – Experience Evaluation**

The existing regulation language in CCR section 117 includes references to CIDP in the Table of Equivalents definition and column headings related to the granting of experience equivalents for education and training experience. This proposal removes such references.

**§ 121 – Form of Examinations; Reciprocity**

The existing regulation language in CCR section 121 subdivision (a)(2) exempts persons who hold a certification from the National Council of Architectural Registration Boards (NCARB) from the CIDP requirement. This proposal removes the reference to CIDP in the exemption.

### **Factual Basis/Rationale**

The Board is mandated to protect the public health, safety, and welfare. Like all other regulatory programs under the Department of Consumer Affairs, the Board is allowed to make a determination on what is required of applicants to become eligible for a professional license. Currently, CCR sections 109, 116, 117, and 121 reference CIDP as a requirement to be eligible for licensure. Changes and updates to the NCARB Intern Development Program (IDP) since 2005 indicate IDP will now achieve the objectives that were established for CIDP. Furthermore, the Board voted at its June 16, 2011, to eliminate CIDP as a requirement for licensure. Therefore, removal of the associated language that requires and references CIDP is necessary.

### **Underlying Data**

The Board relied on the following document in its proposal:

- NCARB IDP Guidelines (October 2010)

### **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 persons than the proposed regulation.