

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

AMENDED 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.~~

In January 2005, the Board implemented a structured internship requirement for all candidates establishing eligibility to take the Architect Registration Examination (ARE), the national licensing examination. This requirement included the adoption of the national Intern Development Program (IDP), which was developed by the National Council of Architectural Registration Boards (NCARB) and required by a majority of the U.S. jurisdictions, and the development and adoption of the Board's evidence-based overlay program, the Comprehensive Intern Development Program (CIDP). Both programs are structured around core competencies, Training Categories/Areas, and Skills and Application Activities (SAA). Completion of both programs is required prior to becoming eligible to take the Board's California Supplemental Examination and obtaining an architect license in California.

The need for an overlay program (CIDP) arose from the Board's concerns about NCARB's national IDP pertaining to: the limited role of the IDP supervisor and mentor; competency assessment; experience alternatives; training areas and settings; IDP entry point (eligibility); duration requirements; and IDP reporting. These concerns are noted on the Underlying Data document (IDP Comparison Chart). CIDP was therefore developed in order to address these concerns, enhance and strengthen the internship experience, and improve the intern/supervisor relationship through discussions about evidence documentation.

Since 2005, the Board has actively monitored updates and improvements to the national program (including NCARB's new IDP 2.0), considered how these changes could impact the Board's overlay program (CIDP), and analyzed the potential for an update to CIDP based on the ongoing changes to IDP. Additionally, with changes to the required IDP Skills and Application Activities (SAA), the removal or merging of SAAs, and/or the reassignment of SAAs under the given IDP Training Categories/Areas, the continual alignment of CIDP with IDP was a concern.

In 2011, the Board and its Professional Qualifications Committee further examined all of the updates and improvements to IDP since 2005 (minutes and summary report [draft] of meetings are referenced within this document – Underlying Data) and additionally determined that the changes made to IDP addressed all of the Board's original concerns, which had resulted in the development and adoption of CIDP. Ultimately, at its June 16, 2011 meeting, the Board voted to repeal CIDP as a requirement for licensure.

The IDP Comparison Chart referenced within this document (Underlying Data) identifies the Board's original concerns with NCARB's IDP and how they have been addressed under the current version of IDP.

Underlying Data

The Board relied on the following document in its proposal:

- [NCARB IDP Guidelines \(~~October~~ July 2011\)](#)
- [IDP Comparison Chart](#)
- [Draft Professional Qualifications Committee Meeting Summary Report \(February 28, 2011\)](#)
- [Board Meeting Minutes \(June 16, 2011\)](#)

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.