

# CALIFORNIA ARCHITECTS BOARD

## INITIAL STATEMENT OF REASONS

Hearing Date: June 13, 2015

Subject Matter of Proposed Regulations: Internship in Architecture Program (IAP)

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

### **Specific Purpose**

1. Problem being addressed: The Canadian Architectural Licensing Authorities (CALA), the organization that develops and administers IAP, has released a revised edition of the IAP Manual, which necessitates updating the version referenced in CCR 109.
2. Anticipated benefits from this regulatory action: The proposed regulatory amendment will update the edition of IAP referenced in CCR 109 to the January 2012 edition. The proposed regulatory amendment will prevent any confusion as to which edition of the IAP Manual candidates must adhere. The revised IAP Manual includes a reduction in the required hours for completion of the program and clarification on the types of acceptable experience for which credit will be granted.

### **Factual Basis/Rationale**

Business and Professions Code (BPC) 5552.5, authorizes the Board to implement an intern development program. CCR 109 clarifies BPC 5552.5 and specifies IAP as an acceptable intern development program.

IAP is a program that ensures Canadian intern architects receive training in all aspects of Canadian architectural practice. IAP is required prior to licensure throughout Canada, and is recognized in the United States as equivalent to the National Council of Architectural Registration Boards' (NCARB) Intern Development Program (IDP). CALA, the organization that develops and administers IAP, revised the IAP Manual to reflect a reduction in the required hours for completion of the program and clarified the types of acceptable experience for which credit will be granted.

The proposed regulatory amendment eliminates the Discretionary Experience portion of IAP, which was 1,880 hours, reducing the total hours required for completion of IAP to 3,720. The edition of the IAP Manual currently referenced in CCR 109 specifies a requirement to document 5,600 hours. Relative to the reduction in hours, CALA has clarified that credit will not be granted while a student at a school of architecture. Credit will only be granted while a candidate is actively enrolled as an intern architect in IAP or in NCARB's IDP.

## **Underlying Data**

None

## **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 revises the edition of the IAP Manual referenced in the regulations, which has no effect on business or bearing on competitiveness.

## **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 edition of the IAP Manual referenced in the regulations 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 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 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 IAP would be referring to an obsolete edition of the program and may not receive credit they would be entitled. This would cause an adverse delay in completion of IAP, and subsequently licensure.