

CALIFORNIA ARCHITECTS BOARD

INITIAL STATEMENT OF REASONS

Hearing Date: March 9, 2015

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 July 2014. This action would reduce any confusion as to which edition of the Guidelines candidates must adhere. The revised Guidelines include expanding the duration which candidates may report work experience for IDP credit.

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. CCR, 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.

Currently interns are required to submit valid work experience in reporting periods of no longer than six months and within two months of completion (effectively an eight-month reporting period). Any experience reported outside the two month submission window expires on a day for day basis and cannot be used for IDP credit.

This proposed change will allow interns to earn IDP credit for valid work experience not previously reported within the timeframe specified by the current reporting requirement.

To earn full credit for experience, interns must submit all experience in reporting periods of no longer than six months and within two months of completion of each reporting period. Experience reported beyond the two-month period and up to five years after the date of the experience will be accepted at a reduced value of fifty percent toward the IDP requirements.

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 updates the reporting requirements of interns, 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 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 benefits the health and welfare of California residents by ensuring architect applicants follow the current national 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 Guidelines and may not receive credit they would be entitled. This would cause an adverse delay in completion of IDP, and subsequently licensure.