

CALIFORNIA ARCHITECTS BOARD

FINAL STATEMENT OF REASONS

Subject Matter of Proposed Regulations: This final statement of reasons addresses the regulations applicable to Examination Eligibility.

Section(s) Affected: Section 116 Article 3 of Division 2 of Title 16 of the California Code of Regulations (CCR)

Updated Information:

The Informative Digest and Initial Statement of Reasons are included in the rulemaking file and incorporated as though set forth herein.

The Board's regulatory proposal was originally approved by the Board at its September 13, 2024 meeting. The Notice documents were published by the Office of Administrative Law (OAL) on January 17, 2025. The 45-day public comment period closed on March 3, 2025. The Board received one comment during this time, submitted by the National Council of Architectural Registration Boards, which was in support of the proposed change. There were no requests for a public hearing and no separate public hearing was held.

During further review by Board staff, it was discovered that the date of the September 13, 2024 Board meeting was incorrectly listed as September 8, 2023 in the underlying data of the Initial Statement of Reasons. In order to correct this error, an addendum to the Initial Statement of Reasons was completed, correcting the date. The addendum was noticed on March 26, 2025. The 15-day public comment period ended on April 10, 2025, and Board received no comments.

The Board ratified the addendum to the Initial Statement of Reasons at its June 5, 2025 meeting.

Summary of Purpose and Rationale for Additional Changes

The following lists changes that were made to the Initial Statement of Reasons:

- On page 3 of the Initial Statement of Reasons in OAL File Z-2025-0106-01 Examination Eligibility, Underlying Data item 1 incorrectly identifies and includes the Board meeting agenda, materials, and minutes related to discussion of this proposal as September 8, 2023. However, the agenda, materials, and minutes should be from September 13, 2024. This change increases clarity by correctly identifying and including the materials from the meeting where the Board noticed the public that the regulation would be discussed, received relevant information related to the proposal, and provided the minutes of the Board's discussion to approve and proceed with the regulatory proposal. With this change the public will be able to accurately reference the correct meeting or request such materials from

the Board. The incorrect meeting listed will be removed to ensure further clarity for the public.

Local Mandate:

A local mandate is not imposed on local agencies or school districts.

Consideration of Alternatives:

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which it was proposed or would be as effective and less burdensome to affected private persons than the adopted regulations or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. The Board incorporates by reference the alternatives identified in its Initial Statement of Reasons and did not receive any comments that altered its findings.

Objections or Concerns Received During 45-Day Public Comment Period and Board Responses:

The Board received one comment regarding the proposed action during the 45-day public comment period. The comment was submitted by the National Council of Architectural Registration Boards and was in support of the proposed action. There were no adverse comments therefore, no response to adverse comments were considered by the Board and no changes to the text were deemed necessary in response.

Comment: National Council of Architectural Registration Boards, February 28, 2025

Summary of Comment

The commenter supported the provision by stating, “this amendment seeks to further streamline how candidates obtain examination eligibility and would align the Board with national architect regulatory standards for licensure by removing any prequalification requirements in order to sit for the Architect Registration Examination® (ARE®). It aims to bring the Board in alignment with other state licensing boards pursuing additional pathways to licensure, and access to the NCARB ARE®. Furthermore, this amendment would remove impediments to exam access for candidates from historically underrepresented groups without compromising the licensure process. This change provides increased access and flexibility while maintaining rigor. It augments the Board’s commitment to multiple paths to licensure, as the Board’s current experience-only pathway already allows candidates to satisfy the educational requirement through specific work experience.”

On June 5, 2025, the written public comment in support of the regulatory change was presented to the Board.

Objections or Concerns Received During 15-Day Public Comment Period and Board Responses:

No comments were received regarding the proposed action during the 15-day public comment period. Therefore, no comments were considered by the Board and no changes to the text were deemed necessary in response.