

**TITLE 16 California Architects Board
DEPARTMENT OF CONSUMER AFFAIRS**

INITIAL STATEMENT OF REASONS

Hearing Date: The California Architects Board has not scheduled a hearing on the proposed changes.

Subject Matter of Proposed Regulations: Licensure and Form Revisions

Section(s) Affected: Section 109 Article 2 of Division 2 of Title 16 of the California Code of Regulations (CCR).

Background and Statement of the Problem:

The California Architects Board (The Board) was created in 1901 by the California State Legislature. The Board licenses, regulates, and investigates complaints against architects in California, totaling approximately 21,000 licensees. It is the Board's duty to enforce and administer the Architects Practice Act, (Business & Professions Code (BPC) Chapter 3 (commencing with section 5500) of Division 3 (Act)). The Board is authorized to establish necessary rules and regulations for the enforcement of the Act and the laws subject to its jurisdiction (BPC section 5526). BPC section 5510.15 mandates that the protection of the public shall be the highest priority of the Board in its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with the other interests sought to be promoted, the protection of the public shall be paramount.

BPC section 5526 authorizes the Board, in accordance with the Administrative Procedure Act (APA) (Government Code (Gov. Code) section 11400 et seq.), to adopt, amend, or repeal rules and regulations that are reasonably necessary to carry out the provisions under the Act. BPC 5550 identifies candidate examination eligibility, and 5552 identifies the licensure qualifications.

The Board's application regulation, 16 CCR section 109, was created to describe the method by which candidates apply for examination eligibility and a license. The existing regulation incorporates by reference an Employment Verification Form (EVF) that candidates may submit for work experience and it also identifies the requirements for the licensure application.

Recent updates to CCR sections 116 and 117 necessitate updating related language in CCR section 109 as they relate to language on the EVF and examinations. Candidates have more training experience that is allowable due to the updates in CCR section 117. Additionally, they are no longer required to document experience prior to examination eligibility. This proposal will update the language to reflect the current examination requirements and provide further clarity as to when candidates are eligible for the

licensure application.

Anticipated benefits from this regulatory action:

This proposal will remove conflicting language within the Board's regulations and provide further clarity about allowable credit submitted on Employment Verification Forms as well as the eligibility requirements for the licensure application.

Specific purpose of, and rationale for, each adoption, amendment, or repeal:

1. Amend 16 CCR section 109(b)(3)(C)(iii)

Purpose: Amends (b)(3)(C)(iii) by removing "NEW 6/2024" and adding "REV 5/2026" to incorporate the revised Employment Verification Form (EVF).

Anticipated Benefit/Rationale: The Board has updated its EVF to reflect the changes that were made to CCR sections 116 and 117. The form no longer refers to obsolete language related to Architect Registration Examination (ARE) eligibility, clarifies the form will not be accepted if experience has already been credited as part of the Architectural Experience Program, clarifies acceptable signatures, and provides that eight (8) years of credit is required for licensure eligibility. Additionally, the project list requirements and employment identifiers are struck, and clarification is added so that work experience is granted in accordance with CCR section 117.

2. Amend Employment Verification Form, 19-C2, Instructions – Reciprocity Candidates

Purpose: Amends the EVF Reciprocity Candidates Instructions by replacing the reference to "California Supplemental Examination" with "license"; adds "Acceptable Signature:", "electronic or", and "typed"; removes "rubber" and "In addition, forms"; and adds a new bullet and "Forms".

Anticipated Benefit/Rationale: These amendments are made to update the requirements for licensure due to the Board's changes to examination eligibility in CCRs sections 116 and 117. The changes clarify which signatures are acceptable, and create a new item on the list to provide clarity about acceptable edits to the form.

3. Amend Employment Verification Form, 19-C2, Instructions – Initial Licensure Candidates

Purpose: Amends the EVF Initial Licensure Candidates Instructions by removing instructions on when the form should not be completed, reference to Architect Registration Examination (ARE) eligibility; adds language on when to complete the form, adds a bullet and language clarifying eight years of educational and work experience (evaluated at 40-hours per week) are required for license eligibility; removes ARE and adds license; adds a bullet and language clarifying what an acceptable signature is; and adds a bullet for the last item on the list.

Anticipated Benefit/Rationale: These updates are made to remove outdated language

related to when the form is not required and clarify the requirements for licensure due to the Board's changes to examination eligibility in CCR sections 116 and 117. The amendments provide the amount of experience required for licensure, acceptable signatures and what will be accepted, and create a new item on the list to provide clarity about acceptable edits to the form.

4. Amend Employment Verification Form, 19-C2, Project List – Submitting Work Experience for Yourself

Purpose: Amends the EVF – Project List Requirement – Submitting Work Experience for Yourself by removing this language and the listed requirements.

Anticipated Benefit/Rationale: This is being removed as it is no longer required. The project list was eliminated from CCR section 117 when it was updated therefore this language is now obsolete.

5. Amend Employment Verification Form, 19-C2, Limits on Training Experience

Purpose: Amends the EVF – Limits on Training Experience by adding that training and education are granted in accordance with CCR section 117, and directs candidates to visit the Board website for the recent Architect Practice Act to see how experience credit is granted.

Anticipated Benefit/Rationale: This language is being added to clarify how the Board evaluates education and work experience as well as where candidates can find this information. This will reduce candidate confusion and provide them with resources on where to find current information related to experience evaluation.

6. Amend Employment Verification Form, 19-C2, Reasons for Rejection or Zero Credit

Purpose: Amends the EVF – Reasons for Rejection or Zero Credit by replacing “original” with “acceptable”, adds “(as identified in the instructions)”, and removes the bulleted item “independent contractor”.

Anticipated Benefit/Rationale: This language is being updated from “original” to “acceptable” to align with the modification in the instructions portion. Additionally, it directs candidates to where they can find the acceptable signature information, and removes the independent contractor from the rejection list as that is no longer allowed after the updates to CCR section 117.

7. Amend Employment Verification Form, 19-C2, Completion and Submission of Form

Purpose: Amends the EVF – Completion and Submission of Form by adding “or electronically”, removing “applying for authorization to take the ARE”, and adding “documenting work experience for licensure”.

Anticipated Benefit/Rationale: This language is being modified to allow electronic signatures and to reflect the updates that candidates are required to document

experience for licensure and not the ARE. Electronic signatures allow candidates to submit documentation electronically which will reduce delays in licensure, and the update from the ARE to licensure requirements stems from the changes in examination eligibility from CCR section 116.

8. Amend Employment Verification Form, 19-C2, Section 1 – to be Completed by the Licensure Candidate

Purpose: Amends the EVF – Section 1 – to be Completed by the Licensure Candidate by replacing “Month”, “Day” and “Year” with “MM”, “DD” and “YYYY”.

Anticipated Benefit/Rationale: This language is being simplified on the form for ease of entry and to clarify that numerical entries are preferred.

9. Amend Employment Verification Form, 19-C2, Section 2 – to be Completed by the Supervisor

Purpose: Amends the EVF – Section 1 – to be Completed by the Supervisor by adding “Use additional Employment Verification Forms if” and removes “If” and “, use additional Employment Verification Forms”.

Anticipated Benefit/Rationale: This language is being simplified for readability.

10. Amend Employment Verification Form, 19-C2, Employment Information

Purpose: Amends the EVF – Employment Information to remove “and work as indicated”, “☐ an employee under my direct supervision”, “☐ an independent contractor”, and replace “Month”, “Day” and “Year” with “MM”, “DD” and “YYYY”.

Anticipated Benefit/Rationale: The language being removed is no longer needed by the Board because the limitation on independent contractor was removed, and all work must be performed under direct supervision. The updated date format is for readability and to clarify that numerical entries are preferred.

11. Amend Employment Verification Form, 19-C2, Licensee Supervisor’s Information

Purpose: Amends the EVF – Licensee Supervisor’s Information by replacing “Month”, “Day” and “Year” with “MM”, “DD” and “YYYY”.

Anticipated Benefit/Rationale: This language is being simplified on the form for ease of entry and to clarify that numerical entries are preferred.

12. Amend Employment Verification Form, 19-C2, Note to Supervisor Completing this Form”

Purpose: Amends the EVF – Note to Supervisor Completing this Form by removing “form”, adding “Employment Verification Form (including attachments)” and “,”, removing “and”, and adding “, and contain no material omissions of fact to the best of my

knowledge and belief”.

Anticipated Benefit/Rationale: The language is being amended ensures the supervisor acknowledges the EVF is complete, signed by them and is completed to the best of their knowledge to eliminate any source of confusion in the future.

13. Amend Employment Verification Form, 19-C2, Footer

Purpose: Amends the Footer to update the version of the form by replacing “NEW 6/2024” with “REV 5/2026”.

Anticipated Benefit/Rationale: This language is being updated to reflect the revised form and date the revision was approved by the Board. This clarifies the version of the form on the document so candidates know they are using the correct form as referenced in regulation.

14. Amend 16 CCR section 109(d)

Purpose: Amends 109 by adding “the following”, removing a “,” and adding a “.” to the statement related to the Board retaining supporting documentation.

Anticipated Benefit/Rationale: This update is being made to correct sentence structure and improve readability to enhance clarity.

15. Amend 16 CCR section 109(h)

Purpose: Amend (h) by adding “passing the ARE, CSE, and completing the requirements in subdivision (b)(2) if applicable,”, removing “completion of the CSE, each person”, and adding “candidates”.

Anticipated Benefit/Rationale: These changes are being made to align the requirements for licensure due to recent updates to CCR section 116 which changed the eligibility requirements for the CSE. The language is being updated to provide that candidates must meet examination and experience requirements before they are eligible for licensure. This will make the process more clear for candidates.

Underlying Data

1. May 21, 2026 Board Meeting Agenda, Relevant Materials, and Minutes

Business Impact:

The Board has made the initial determination that the proposed regulations will not have significant statewide adverse economic impact directly affecting businesses including the inability of California businesses to compete with businesses in other states.

This initial determination is based on the fact that the proposed regulations simply clarify allowable credit and requirements for the licensure application. The regulations do not

result in additional workload or costs for businesses and therefore are not anticipated to result in any significant adverse impacts.

Economic Impact Assessment:

The Board has determined that this regulatory proposal will have the following effects:

It will not create or eliminate jobs within the State of California because it only clarifies document submittal information and eligibility.

It will not create new business or eliminate existing businesses within the State of California because it only clarifies document submittal information and eligibility.

It will not affect the expansion of businesses currently doing business within the State of California because it only clarifies document submittal information and eligibility.

This regulatory proposal will not affect the health and welfare of Californians because it does not relate to health and welfare.

This regulatory proposal does not affect worker safety because it does not involve worker safety.

This regulatory proposal does not affect the state's environment because it does not involve the environment.

Specific Technologies or Equipment:

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives:

The Board has made an initial determination that 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.

No such alternatives have been proposed; however, the Board welcomes comments from the public.

Description of reasonable alternatives to the regulation that would lessen any adverse impact on small business:

No such alternatives have been proposed, however, the Board welcomes

comments from the public.