TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS
DIVISION 2.
California Architects Board
DEPARTMENT OF CONSUMER AFFAIRS

INITIAL STATEMENT OF REASONS

Hearing Date: No hearing scheduled.

Subject Matter of Proposed Regulations: Examination Transition Credit

Section(s) Affected: Sections 118.5, 119.7, and 119.8 of Article 3 of Division 2 of Title 16, California Code of Regulations (CCR).

BACKGROUND AND STATEMENT OF THE PROBLEM

The California Architects Board (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 (Chapter 3 (commencing with section 5500) of Division 3 of the Business and Professions Code (BPC)) (Act). The Board is authorized to establish necessary rules and regulations for the enforcement of the Act and the laws subject to its jurisdiction. (Bus. & Prof. Code, § 5526.)

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 requirement for licensure, and 5550.3 allows the Board to delegate authority to grade the examination of applicants.

The Board's examination transfer credit regulation, 16 CCR section 118.5, was created to describe the method by which candidates would receive transfer credit for examinations passed in relation to the Architect Registration Examination (ARE). Additionally, the regulation contains references to other CCR sections that contain specific transitional credit charts for the California Architect Licensing Examination (CALE) and the ARE.

16 CCR section 119.7 contains the examination transition plan for ARE 3.1 to ARE 4.0. This transition plan contains specific information on how candidates would receive credit

for ARE 3.1 divisions as the examination transitioned to ARE 4.0, and at what point candidates would no longer be able to take ARE 3.1.

16 CCR section 119.8 contains the examination transition plan for ARE 4.0 to ARE 5.0. This transition plan contains specific information on how candidates would receive credit for ARE 4.0 divisions as the examination transitioned to ARE 5.0, and at what point candidates would no longer be able to take ARE 4.0.

The current regulations follow the requirements set forth by the National Council of Architectural Registration Boards (NCARB), who develops and administers the ARE. CCR section 118.5 is being updated to remove the requirement that candidates must have passed an examination in another United States or Canadian jurisdiction, and adds that a candidate who has passed an examination prepared by NCARB will receive credit and transitional credit as dictated by NCARB. Repealing CCRs 119.7 and 119.8 will remove unnecessary language included in the Board's regulations. It will allow candidates to follow the NCARB's documented examination transition and retention policy, which is the national standard for this examination. ARE development and transitions are both maintained by NCARB and agreed to by its member boards. This allows candidates to follow transitional guidelines set by NCARB, rather than wait for the Board to propose and adopt regulations that mimic these NCARB transitions in their entirety. Additionally, candidates will be able to rely on NCARB provided dates for when examinations will no longer be available or counted for credit.

ANTICIPATED BENEFITS FROM THIS REGULATORY ACTION

This proposal will clarify that candidates will refer to NCARB transition guidelines when completing NCARB administrated examinations. Additionally, this proposal will repeal unnecessary and outdated language related to examination transition credit.

SPECIFIC PURPOSE OF, AND RATIONALE FOR, EACH ADOPTION, AMENDMENT, OR REPEAL:

1. Amend 16 CCR section 118.5

Purpose: Amends 118.5 by adding "the National Council of Architectural Registration Boards, strikes "in another United States or Canadian jurisdiction", adds "and", strikes "119.7, and 119.8", and adds "A candidate who has passed an examination prepared by NCARB or divisions thereof shall receive transitional credit between examination versions as dictated by NCARB."

Anticipated Benefit/Rationale: These amendments are being made to clarify that candidates who take the ARE shall follow the direction of NCARB when referring to any

transitional credit obtained when the ARE changes versions. Striking the requirement that divisions must be passed in another United States or Canadian jurisdiction offers candidates more testing opportunities as the ARE is offered outside the United States and Canada, and foreign candidates are able to take the ARE. Striking section 119.7 and 119.8 is being done since those sections are being repealed and will longer point to a valid section.

2. Amend 16 CCR section 118.5 Authority and Reference

Purpose: Amends the authority and reference by adding BPC 5550.3.

Anticipated Benefit/Rationale: BPC 5550.3 allows the Board to delegate its authority to grade the examination, which is current practice. Updating the authority and reference is allows candidates to review the proper BPC section.

3. Repeal CCR 119.7

Purpose: Repeal CCR 119.7 and all language contained.

Anticipated Benefit/Rationale: This section is no longer necessary because the Board requires and candidates follow the ARE transition set by NCARB. NCARB sets the transition of examination as part of development and administration of the examination. As NCARB releases examination transition information, candidates are directed to them for information, and therefore, this section may cause confusion if not repealed.

4. Repeal CCR 119.8

Purpose: Repeal CCR 119.8 and all language contained.

Anticipated Benefit/Rationale: This section is no longer necessary because the Board requires and candidates follow the ARE transition set by NCARB. NCARB sets the transition of examination as part of development and administration of the examination. As NCARB releases examination transition information, candidates are directed to them for information, and therefore, this section may cause confusion if not repealed.

UNDERLYING DATA

Technical, theoretical, or empirical studies, reports, or documents relied upon:

1. May 21, 2026 Board Meeting Agenda, Relevant Materials, and Minutes
2. Business and Professions Code Section 5550.3
3. NCARB ARE 5.0 Transition Calculator website (https://arecalc.ncarb.org/)

BUSINESS IMPACT

The Board has made the initial determination that the proposed regulations will not have a 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 facts that the proposed regulations simply clarify allowable credit and requirements for the licensure application. The regulations do not result in additional workload or costs to businesses and therefore are not anticipated to result in any negative 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 will not create new business or eliminate existing businesses within the State of California because…

It will not affect the expansion of businesses currently doing business within the State of California because…

This regulatory proposal does not affect the health and welfare of California residents 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

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.