

## Concise Explanatory Statement

**Second Public Comment Period 4/6/2021 to 5/6/2021**

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**AGENCY:** Rhode Island Department of Business Regulation

**DIVISION:** Board of Examination and Registration of Architects

**RULE IDENTIFIER:** 415-RICR-00-00-1

**REGULATION TITLE:** Rules and Regulations for Architects

**RULEMAKING ACTION:** Full Rulemaking, Amendment

**REASON FOR RULEMAKING:**

The impetus for the amendments was when the Board received an inquiry from the Emerging Professionals Network of AIA Rhode Island regarding the Board's policy for the National Council of Architectural Registration Boards (NCARB) Integrated Path to Architectural Licensure (IPAL). The IPAL option allows students in the process of earning an accredited architecture degree to complete the experience requirements and portions of the Architectural Registration exam (ARE) concurrently. (The ARE is a multi-part exam given in 6 divisions, which are administered in separate sittings. The exam length is a total of 21 hours.) The goals of IPAL are to streamline and hopefully shorten the path to licensure for architecture students and provide them with work experience prior to graduation. There are currently 21 schools nationwide that have established an IPAL option, with U Mass Amherst and Boston Architectural College being the closest to RI.

After reviewing the comments received from January 8, 2021 to February 7, 2021, comment period, the Board and the Department have made some additional changes to the Continuing Education section to clarify existing practices. In addition, new provisions would allow members of state architect licensing boards and certain other RI state and local boards to receive up to four continuing education credits for membership on those public bodies. Only one credit will be awarded per meeting, provided that the meeting was at least 50 minutes long and the architect can prove that they were in attendance.

### CHANGES TO TEXT OF THE RULE:

Two comments were received which supported the proposed amendments. No changes to the text of the rule were made. Therefore, the final rule is the same as what was proposed.

### REGULATORY ANALYSIS

With its recognition of NCARB's IPAL program, the Board is helping to streamline the path to licensure for RI applicants. This benefits the current group of emerging professionals seeking to

apply for initial registration in RI. This is positive for the industry in the state and may encourage more new architect registrations in RI. This may also result in the accredited architecture degree programs in RI adopting the IPAL program as well.

The continuing education amendments recognize the volunteer service registered architects to state architect licensing boards and RI boards involved in reviewing building plans and building codes.

The additional amendments in response to commentary received in the first comment period (1/8/21 to 2/7/21) are to clarify some ambiguous provisions in the regulation. These amendments codify the status quo of architect continuing education requirements in the regulation by explaining specifically that the Board does not approve course providers and classes, that AIA transcripts and course completion certificates with HSW designations are proof of completion and that the Board will review those documents if the architect is audited for CE compliance. We also clarify that courses may be taken in person or online (live or asynchronous), which is also the status quo.

Any small business impact is positive. In the development of the proposed amendment consideration was given to: (1) alternative approaches; (2) overlap or duplication with other statutory and regulatory provisions; and (3) significant economic impact on small business. No alternative approach, duplication, or overlap was identified based upon available information.