

**CALIFORNIA ARCHITECTS BOARD
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE
INITIAL STATEMENT OF REASONS**

Hearing Date: **April 11, 2011**

Subject Matter of Proposed Regulation: **Education and Training Credits**

Sections Affected: California Code of Regulations (CCR), Title 16, Division 26, Sections 2615 and 2620

As a result of legislative reorganization, the Landscape Architects Technical Committee (LATC), established on January 1, 1998, replaced the former Board of Landscape Architects and was placed under the purview of the California Architects Board (Board). Business and Professions Code section 5630 authorizes the Board to adopt, amend, or repeal rules and regulations that are reasonably necessary in order to carry out the provisions under the Landscape Architects Practice Act.

SPECIFIC PURPOSE OF AMENDMENT

Section 2615 – Form of Examinations

This proposal would modify CCR section 2615 with the following changes: 1) add new language that clarifies the education and work experience requirements to apply for eligibility to take the Landscape Architect Registration Examination (LARE); and 2) add new language that allows candidates with specific educational experience defined under CCR 2620 to apply for eligibility to take the multiple-choice sections of the LARE.

Section 2620 – Education and Training Credits

This proposal would retain the Board's existing education and training credits and make the following changes: 1) add new language under Section 2620(a) allowing education credit for partial completion of a degree in landscape architecture from an approved school; education credit for partial completion of an extension certificate in landscape architecture from an approved school and a degree from a school with a four-year curriculum; and education credit for an accredited degree in architecture with a four-year curriculum; 2) add new language under Section 2620(b) that defines "partial completion" as specified under subsections (a)(7) and (8); 3) add new language under Section 2620(c)(1)(B) allowing candidates with education credit under subsections (a)(7) and (8) to gain one year of training/practice credit under the direct supervision of a landscape architect licensed in a United States jurisdiction; and 4) make additional clarifying edits to the language.

FACTUAL BASIS/RATIONALE

The Joint Legislative Sunset Review Committee's (JLSRC) 2004 Recommendations and the LATC 2005 Strategic Plan directed the LATC to review the existing six-year education and

experience requirement for examination, identify eligibility issues and propose solutions. The Strategic Plan further directed the LATC to, if necessary, modify examination eligibility requirements under California Code of Regulations, Title 16, Division 26, Section (CCR) 2620, and prepare “guidelines” for meeting examination education and experience requirements.

As a result of the JLSRC’s recommendations, the LATC formed an Education Subcommittee to evaluate California’s eligibility requirements for the LARE in order to ensure that applicants have appropriate training and educational experience. Specifically, the Subcommittee was to determine appropriate levels of education as they relate to public health, safety and welfare in California and successfully preparing applicants for the LARE. The Subcommittee recommended that the LATC: 1) grant credit for accredited professional degrees in architecture; 2) grant credit for partial completion of an accredited degree in landscape architecture; 3) define “partial completion” as completion of 80% of the total units required for completion of a four-year degree or extension certificate program; 4) allow candidates with a degree in landscape architecture from an approved school or an extension certificate in landscape architecture from an approved school to apply to take the multiple-choice sections of the LARE prior to meeting the training experience requirements.

The Education Subcommittee was created in August 2004 in response to the JLSRC’s recommendation to further evaluate California’s eligibility requirements and access to landscape architecture licensure in California. The intent of the evaluation was to ensure that applicants have appropriate educational and training experience prior to taking the required examination.

The Subcommittee met between October 2004 and December 2009, during which time it reviewed education and training experience requirements in other landscape architecture licensing jurisdictions, the Council of Landscape Architectural Registration Boards’ examination requirements, and the examination eligibility requirements of other California licensing Boards of related professions.

The Subcommittee’s recommendation to accept an accredited degree in architecture was based on the following: 1) the JLSRC raised concerns regarding the fact that, prior to 1997, California applicants could receive educational credit for holding any type of bachelors degree with a four-year curriculum; 2) the Board grants educational credit for designated degrees related to architecture and unrelated degrees; 3) a review of the neighboring and larger landscape architectural licensing jurisdictions (New York, Florida, Texas, Arizona, Hawaii, Nevada, New Mexico, Oregon, and Washington) revealed that at least six out of those nine jurisdictions recognize degrees related to landscape architecture; and 4) CLARB currently allows applicants to sit for the licensing examination with any type of bachelors degree, plus three years of diversified experience under the direct supervision of a licensed landscape architect. In addition, a survey sent out by LATC staff in May 2005 to the landscape architectural licensing jurisdictions listed above confirmed that: 1) many of the states accept various related degrees; 2) a few of the states accept any degree; and 3) most of the states that accept non-landscape architecture degrees accept architecture and civil engineering degrees.

The Subcommittee agreed to recommend one-year of educational credit be granted for completion of an accredited architecture degree because the Subcommittee determined the

curricula examined for such degree programs did not include sufficient specific exposure to landscape architecture related topics, but did address a certain measure of critical thinking and technical skills that are necessary to address health, safety and welfare issues related to the practice of landscape architecture. The Subcommittee felt there was not clear and/or comparable rationale for granting similar credit for other related degree programs based on their insufficient curriculum and/or lack of accreditation standards.

The Subcommittee based its recommendation to grant educational credit for partial completion of a degree in landscape architecture from an approved school or an approved extension certificate program on the following: 1) the former Board of Landscape Architects previously granted credit for partial completion of degree programs; 2) the California Architects Board also recognizes partial completion of various degree programs (i.e., architecture degrees and related degrees); and 3) granting educational credit for partial completion would expand the pathways to licensure. The Subcommittee determined that an 80 percent partial completion standard was sufficient to ensure the applicants complete more than the general education courses.

The proposed partial completion standard required the LATC to re-evaluate its requirement for candidates to gain at least one year of training/practice credit under the direct supervision of a landscape architect licensed in a United States jurisdiction after graduation. By granting educational credit for partial completion of a degree, a candidate would also need credit for training under a licensed landscape architect before graduation in order to fulfill the training credits requirement. The LATC proposed amending subsection (c)(1)(B) to allow candidates to fulfill the one year of training under a licensed landscape architect requirement after completion of 80 percent of a degree in landscape architecture from an approved school or an approved extension certificate program.

The Subcommittee discussed allowing candidates to take the multiple-choice sections of the LARE before completing the work experience requirements. These discussions centered on the fact that CLARB and other CLARB member jurisdictions allow candidates to take the multiple-choice sections of the LARE after completion of the educational requirements and without any work experience. LATC staff contacted CLARB and these member jurisdictions to gather additional information on their examination standards. CLARB reported that pass rate data did not show any correlation between early eligibility to take the multiple-choice sections of the LARE and the pass rates for these exam sections. The member jurisdictions that responded to the LATC's inquiries reported several positive impacts to allowing early eligibility for taking the multiple-choice sections of the LARE, such as increasing the pool of potential licensees and increasing the volume of candidates taking these sections of the LARE. These findings led the Subcommittee to recommend allowing candidates with an approved degree in landscape architecture to qualify for the multiple-choice sections of the LARE. The Subcommittee also recommended allowing candidates with an approved extension certificate plus four-year degree to qualify for the multiple-choice sections of the LARE based on the belief that extension certificate holders are equally qualified for early eligibility as accredited degree holders.

The Subcommittee submitted its final findings and recommendations to the LATC at its January 2010 meeting, which included changes to the LATC's education and experience requirements for examination applicants (*The Evaluation of Education and Experience Requirements to Examine for Licensure*, 2010). At this meeting, the LATC approved the Subcommittee's proposed

changes to CCR sections 2615 and 2620. The Board approved the proposed changes at its March 2010 meeting.

By expanding eligibility opportunities for students and candidates, these regulations compliment the Department of Consumer Affairs' Licensing for Job Creation Initiative by enabling more individuals to become licensed and do so more efficiently.

UNDERLYING DATA

1. Summary Report – Education Subcommittee, March 4, 2005
2. Summary Report – Education Subcommittee, June 17, 2005
3. Summary Report – Education Subcommittee, December 2, 2005
4. Summary Report – Education Subcommittee, November 8, 2006
5. Summary Report – Education Subcommittee, February 7, 2007
6. Summary Report - Landscape Architects Technical Committee, January 20, 2010
7. Meeting Minutes - California Architects Board, March 18, 2010
8. Snapshot: Landscape Architecture Laws, Eligibility Requirements: Education, Experience & Examination, May 1, 2004
9. June 17, 2005, Education Subcommittee Meeting Agenda Item C Cover Sheet & Council of Landscape Architectural Registration Boards (CLARB) member board jurisdictions – 2005 Examination/Licensure Eligibility Requirements Survey Results
10. December 2, 2005, Education Subcommittee Meeting Agenda Item D.1 Cover Sheet; 2005 Review of Planning Degree Requirements in California and Review of Accrediting Agencies for Related Degrees
11. February 27, 2007, Education Subcommittee Meeting Agenda Item C.4 & Comparison of Curriculum for Accredited Degrees in Architecture and Civil Engineering
12. December 2, 2005, Education Subcommittee Meeting Agenda Item D.2 & Transcripts and Course Requirements for Three Accredited Undergraduate Landscape Architecture Degree Programs
13. December 2, 2005, Education Subcommittee Meetings Agenda Item D.3; CLARB's Standards of Eligibility for Council Certification; Questions Asked of CLARB Regarding Multiple Choice Sections of the Exam; and Comments from Christine Anderson and Steve Lang

BUSINESS IMPACT

This regulation will not have a significant adverse economic impact on businesses.

SPECIFIC TECHNOLOGIES OR EQUIPMENT

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

CONSIDERATION OF ALTERNATIVES

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.