

Regulatory Analysis Form

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LEGISLATIVE
REVIEW COMMISSION

(1) Agency

Department of State

Bureau of Professional and Occupational Affairs

State Architects Licensure Board

(2) I.D. Number (Governor's Office Use)

16A-416

IRRC Number: 2261

(3) Short Title

Annual Renewal Fees for Registered Architecture Firms

(4) PA Code Cite

49 Pa. Code, §§ 9.3, 9.41 – 9.52,
9.111 – 9.118 and 9.131 – 9.132

(5) Agency Contacts & Telephone Numbers

Primary Contact: Roberta L. Silver, Assistant Counsel
State Architects Licensure Board (717) 783-7200

Secondary Contact: Joyce McKeever, Deputy Chief
Counsel, Department of State (717) 783-7200

(6) Type of Rulemaking (check one)

- ☒ Proposed Rulemaking
☐ Final Order Adopting Regulation
☐ Policy Statement

(7) Is a 120-Day Emergency Certification
Attached?

- ☒ No
☐ Yes: By the Attorney General
☐ Yes: By the Governor

(8) Briefly explain the regulation in clear and nontechnical language.

The State Architects Licensure Board (Board) proposes to amend 49 Pa. Code § 9.3 (relating to fees), by implementing an annual renewal fee for registered architecture firms and eliminating reference to cost and procedures for taking the Architect Registration Examination (ARE) which is given by the National Council of Architectural Registration Boards (NCARB), as set forth in Annex A. The Board further proposes to amend 49 Pa. Code §§ 9.41 – 9.49(a) and §§ 9.111 – 9.132 by rearranging license eligibility and examination requirements in a more cohesive and orderly fashion, as set forth in Annex A.

(9) State the statutory authority for the regulation and any relevant state or federal court decisions.

The amendments are adopted under Sections 8, 11 and 13 of the Architects Licensure Law, Act of December 14, 1982, P.L. 1227, as amended, 63 P.S. §§ 34.11, 34.13.

Regulatory Analysis Form

(10) Is the regulation mandated by any federal or state law or court order, or federal regulation? If yes, cite the specific law, case or regulation, and any deadlines for action.

Yes. The Board is required by statute to adopt regulations setting fees as specified in Sections 11 and 13 of the Architects Licensure Law, Act of December 14, 1982, P.L. 1227, as amended, 63 P.S. §§ 34.11, 34.13.

(11) Explain the compelling public interest that justifies the regulation. What is the problem it addresses?

General operating and enforcement expenses of the Board are apportioned to the general licensee population through the collection of license renewal fees. No renewal fee has been established for architecture firms. The Board seeks to establish a renewal fee for renewing the registration of architecture firms, thereby causing licensed firms to contribute to the general operating and enforcement expenses of the Board.

(12) State the public health, safety, environmental or general welfare risks associated with nonregulation.

Nonregulation would adversely impact the fiscal integrity of the Board.

(13) Describe who will benefit from the regulation. (Quantify the benefits as completely as possible and approximate the number of people who will benefit.)

The licensing population and the general public will benefit in that the Board will have the fiscal integrity to carry on its mandate of issuing licenses, registering architect firms, regulating the profession, and protecting consumers.

Regulatory Analysis Form

(14) Describe who will be adversely affected by the regulation. (Quantify the adverse effects as completely as possible and approximate the number of people who will be adversely affected.)

The Board has not identified any group of individuals or entities who will be adversely affected by the regulation.

(15) List the persons, groups or entities that will be required to comply with the regulation. (Approximate the number of people who will be required to comply.)

All registered architecture firms will be required to comply with this regulation. The Board anticipates that approximately 2,000 firms will renew their registration biennially.

(16) Describe the communications with and input from the public in the development and drafting of the regulation. List the persons and/or groups who were involved, if applicable.

Copies were provided to those interested parties who requested an opportunity to provide input. On July 27, 2001, the Board solicited input from the American Institute of Architects of Pennsylvania and NCARB. The Board did not receive comments or suggestions.

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures which may be required.

The Board estimates that there are presently 2,000 registered architecture firms that would be affected by this proposed regulation. The total aggregate cost for the regulated community is approximately \$100,000 annually or \$200,000 biennially.

Regulatory Analysis Form

(18) Provide a specific estimate of the costs and/or savings to local governments associated with compliance, including any legal, accounting or consulting procedures which may be required.

Local governments will not be affected by the regulation.

(19) Provide a specific estimate of the costs and/or savings to state government associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required.

The Board will not incur an increase in administrative costs by implementing the regulation. Indeed, the amendments will permit the Board to recoup the costs of sending out renewal notices, collecting fees, and performing other administrative tasks associated with the registration of architecture firms.

Regulatory Analysis Form

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY Year	FY +1 Year	FY +2 Year	FY +3 Year	FY +4 Year	FY +5 Year
SAVINGS:	\$	\$	\$	\$	\$	\$
Regulated Community						
Local Government						
State Government						
Total Savings						
COSTS:						
Regulated Community	100,000	100,000	100,000	100,000	100,000	100,000
Local Government						
State Government						
Total Costs						
REVENUE LOSSES:						
Regulated Community						
Local Government						
State Government						
Total Revenue Losses						

(20a) Explain how the cost estimates listed above were derived.

The cost estimates are based upon the following number of registered firms that will avail themselves of the specified services over a fiscal year (one-half biennium) period multiplied by the savings or additional costs to the applicant for services:

Annual renewal $\$50 \times 2,000 = \$100,000$

Regulatory Analysis Form

(20b) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3	FY -2	FY -1	Current FY
See attached fee report form.	247,480.26	236,308.10	228,921.41*	247,000
* Additional expenses (approximately \$2,000) may post up to 6/30/02 because of a waiver for the System Automation project.				

(21) Using the cost-benefit information provided above, explain how the benefits of the regulation outweigh the adverse effects and costs.

The amendments to the existing regulations will assure that the Board will be able to recover the costs of its biennial expenditures.

(22) Describe the nonregulatory alternatives considered and the costs associated with those alternatives. Provide the reasons for their dismissal.

No nonregulatory alternatives were considered because the Board's enabling statute requires the Board to promulgate regulations to establish fees that generate revenue sufficient to match the Board's expenditures.

(23) Describe alternative regulatory schemes considered and the costs associated with those schemes. Provide the reasons for their dismissal.

No alternative regulatory schemes were considered because the Board's enabling statute requires the Board to promulgate regulations to establish fees that generate revenue sufficient to match the Board's expenditures.

Regulatory Analysis Form

(24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulation.

There are no federal licensure standards.

(25) How does this regulation compare with those of other states? Will the regulation put Pennsylvania at a competitive disadvantage with other states?

Maryland	\$ 30/annual
New Jersey	\$500/biennial
New York	\$ 35/annual
Ohio	\$ 25/annual

The regulation will not put Pennsylvania at a competitive disadvantage with other states.

(26) Will the regulation affect existing or proposed regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

This regulation will have no effect on other registrations of the Board or other state agencies.

(27) Will any public hearings or informational meetings be scheduled? Please provide the dates, times, and locations, if available.

The Board reviews regulatory proposals at regularly scheduled bi-monthly public meetings. However, in light of the statutory mandate, the Board has not scheduled public hearings or informational meetings regarding this regulation.

Regulatory Analysis Form

(28) Will the regulation change existing reporting, record keeping, or other paperwork requirements? Describe the changes and attach copies of forms or reports which will be required as a result of implementation, if available.

Additional paperwork and record keeping will be necessary because of the implementation of the new annual fee, collected biennially.

(29) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

The Board has perceived no special needs of any subject of its applicants or licensees for whom special accommodations should be made.

(30) What is the anticipated effective date of the regulation; the date by which compliance with the regulation will be required; and the date by which any required permits, licenses or other approvals must be obtained?

The regulation will be effective upon publication as final rulemaking in the *Pennsylvania Bulletin*.

(31) Provide the schedule for continual review of the regulation.

The Board reviews its revenues and costs of its programs on a fiscal year and biennial basis.

**FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU**

(Pursuant to Commonwealth Documents Law)

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REVIEW ROOM

DO NOT WRITE IN THIS SPACE

#2261

Copy below is hereby approved as to form and legality. Attorney General

BY: *Cristina J. O'Connell*
(DEPUTY ATTORNEY GENERAL)

Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:

State Architects Licensure Board
(AGENCY)

Copy below is approved as to form and legality. Executive or Independent Agencies

BY: *John V. Turner*

MAR 06 2002

DATE OF APPROVAL

DOCUMENT/FISCAL NOTE NO. 16A-416

DATE OF ADOPTION: _____

BY: *Ann Shepard Houston*
Ann Shepard Houston, President

DATE OF APPROVAL

2/20/02

(Deputy General Counsel
(Chief Counsel,
Independent Agency
(Strike inapplicable
title)

TITLE: Chairperson
(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

[] Check if applicable
Copy not approved.
Objections attached.

[] Check if applicable. No Attorney General approval or objection within 30 day after submission.

PROPOSED RULEMAKING
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE ARCHITECTS LICENSURE BOARD
49 PA. CODE, CHAPTER 9

EXAMINATION FEES

ANNUAL RENEWAL FEE FOR
REGISTERED ARCHITECTURE FIRMS

The State Architects Licensure Board (Board) proposes to amend 49 Pa. Code § 9.3 (relating to fees), by implementing an annual renewal fee for registered architecture firms and eliminating reference to the cost and procedures for taking the Architect Registration Examination (ARE) which is given by the National Council of Architectural Registration Boards (NCARB), as set forth in Annex A. The Board further proposes to amend 49 Pa. Code §§ 9.41 – 9.49(a) and §§ 9.111 – 9.132 by rearranging license eligibility and examination requirements in a more cohesive and orderly fashion, as set forth in Annex A.

A. Effective Date

The amendment will be effective upon publication of the final form regulation in the Pennsylvania Bulletin.

B. Statutory Authority

The amendments are authorized under Sections 8, 11 and 13 of the Architects Licensure Law (Act) (63 P.S. § 34.8, § 34.11 and § 34.13).

C. Background and Purpose

Deletion of Reference To The ARE Fee

The Board proposes to eliminate reference to the ARE examination fee over which the Board has no control or involvement. The ARE is a recognized uniform examination used throughout the United States. The General Assembly has indicated its preference for the recognition of national uniform examinations and grading services in accordance with Section 812.1 of the Administrative Code of 1929 (71 P.S. § 279.3(a)). The fee for the examination is established by the national examiner and communicated directly to the applicants. Applicants for the examination pay the examination fee directly to the national examiner. Thus, it is unnecessary and impractical for the Board to continue to publish the national examiner's examination fee in the Board's regulations.

In lieu of publishing the cost of the examination, the Board proposes § 9.41(a), as set forth in Annex A, which promulgates the adoption of national board examinations, including the fee established by NCARB.

Annual Renewal Fee For Registered Architecture Firms

General operating and enforcement expenses of the Board are apportioned to the general licensee population through the collection of license renewal fees. Section 11(a) of the Act, 63 P.S. § 34.11(a), requires the Board to increase fees by regulation if the revenues raised by fees, fines and civil penalties are not sufficient to meet expenditures over a two-year period.

Section 13(j) of the Act, 63 P.S. § 34.13(j), states that the Board shall, by promulgation of rules and regulations, require that registered architecture firms file with the Board information concerning their officers, directors, partners, professional association board of governors, beneficial owners, members or managers and such other aspects of their organization as the Board deems appropriate. This section also authorizes the Board to charge each registered architecture firm an annual filing fee in an amount determined by the Board.

No renewal fee has been established for architecture firms. The Board seeks to establish a renewal fee for renewing the registration of architectural firms, thereby causing licensed firms to contribute to the general operating and enforcement expenses of the Board.

The annual fee of \$50, as set forth in Annex A, will be collected by the Board biennially. This means that, every two years, the Board will collect \$100 from each registered architecture firm.

Examination and Grading Procedures

Section 8(c) of the Act, 63 P.S. § 34.8(c), authorizes the Board to adopt the examination and recommended grading procedures adopted by NCARB. Because the adoption of NCARB's examination and grading procedures would eliminate the Board's role in the process, the Board proposes to delete regulations outlining its role in the administration of the examination.

D. Description of Amendment

Renewal Fee For Registered Architecture Firms

The following table outlines the affected fee and change:

<u>Application</u>	<u>Current Fee</u>	<u>Proposed Fee</u>
Annual renewal fee for registered architecture firms	\$0.00	\$ 50.00

Licensure By Examination

Section 9.41 informs candidates that the subject matter of the ARE examination is available from NCARB.

Section 9.41a proposes the adoption of national board examinations, including the fee established by NCARB.

Section 9.49a (a) informs candidates that information concerning the Intern Development Program (IDP) of NCARB is available directly from NCARB.

Section 9.49a (b) directs candidates to have NCARB transmit a certificate of completion of IDP to the Board.

Grading And Review

Sections 9.51 and 9.52 are identical to §§ 9.131 and 9.132. The Board proposes that these two sections become §§ 9.51 and 9.52, so that they will appear alongside the related regulations referring to Licensure By Examination and Examination. Sections 9.131 and 9.132 would then be deleted.

Examination

Section 8(c) of the Act, 63 P.S. § 34.8(c), authorizes the Board to adopt the examination and recommended grading procedures adopted by NCARB. As such, it is unnecessary to continue to publish §§ 9.111 – 9.118, relating to dates of examination, location of examination, due notice, admittance and proctors. Therefore, the Board proposes that those sections of the regulations be deleted.

E. Compliance with Executive Order 1996-1

In compliance with the requirements of Executive Order 1996-1 (February 6, 1996), in drafting and promulgating the regulation, the Board considered the regulation as both required by

law and the least restrictive means of covering the costs of services required to be performed by the Board. Further, on July 27, 2001, the Board solicited input from the American Institute of Architects of Pennsylvania and the National Council of Architect Registration Boards.

F. Fiscal Impact and Paperwork Requirements

The proposed amendment will implement an annual renewal fee for registered architecture firms in the Commonwealth, but, otherwise, should have no fiscal impact on the private sector, the general public or political subdivisions.

The proposed amendment will require the Board to alter some of its forms to reflect the new fee; however, the proposed amendments should create no additional paperwork for the private sector.

G. Sunset Date

The Board continuously monitors the cost effectiveness of its regulations. Therefore, no sunset date has been assigned.

H. Regulatory Review

Pursuant to Section 5(a) of the Regulatory Review Act, (71 P.S. § 745.5(a)), the Board submitted a copy of this proposed regulation on March 21, 2002, to the Independent Regulatory Review Commission (IRRC) the Senate Consumer Protection and Professional Licensure Committee (SCP/PLC), and the House Professional Licensure Committee (HPLC). In addition to submitting the proposed rulemaking, the Board has provided IRRC, SCP/PLC, and HPLC with a copy of a detailed Regulatory Analysis Form prepared by the Board in compliance with Executive Order 1996-1, "Regulatory Review and Promulgation." A copy of this material is available to the public upon request.

Under Section 5(g) of the Regulatory Review Act (71 P.S. § 745.5(g)), if IRRC has objections to any portion of the proposed rulemaking, it will notify the Board within 10 days of the close of the SCP/PLC and HPLC review period. The notification shall specify the regulatory review criteria which have not been met. The Regulatory Review Act specifies detailed procedures for review of objections by the Board, the General Assembly, and the Governor prior to publication of the regulations.

I. Public Comment

Interested persons are invited to submit written comments, suggestions or objections regarding this proposed rulemaking to Dorna Thorpe, State Architects Licensure Board, 116 Pine Street, P.O. Box 2649, Harrisburg, PA 17105-2649 (dthorpe@state.pa.us) within 30 days following publication of this proposed rulemaking in the *Pennsylvania Bulletin*.

Ann Shepard Houston, President
State Architects Licensure Board

ANNEX A

**TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS
PART I. DEPARTMENT OF STATE
SUBPART A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS
CHAPTER 9. STATE ARCHITECTS LICENSURE BOARD**

GENERAL PROVISIONS

§ 9.3. Fees.

[(a)] The cost of the ARE is \$980. The fee for each portion is:

Predesign.....	\$ 92
Site Planning.....	\$129
Building Planning.....	\$155
Building Technology.....	\$145
General Structures.....	\$108
Lateral Forces.....	\$ 79
Mechanical and Electrical.....	\$ 83
Material and Methods	\$ 90
Construction Documents and Services.....	\$ 99
[(b)][a] Initial License.....	\$ 40
[(c)][b] Reciprocal license with NCARB Certification.....	\$ 30
Reciprocal license without NCARB Certification.....	\$ 50
[(d)][c] Certification of licensure, registration or scores.....	\$ 25
[(e)][d] Biennial renewal of license.....	\$100
[(f)][e] Reactivation of lapsed or expired license.....	\$ 30
[(g)][f] Firm practice registration or modification <u>requiring new corporate structure</u>	\$ 50
[(h)][g] License or registration verification.....	\$ 15
<u>[(h)] Annual renewal fee for registered architecture firms.....</u>	<u>\$ 50</u>
<u>(\$100 fee shall be assessed biennially)</u>	

* * *

LICENSURE BY EXAMINATION

§ 9.41. General Requirements.

Licensure may be granted to an applicant who has successfully passed the ARE examination. The subject matter is [described in detail in the NCARB's Circular of Information No. 2 which is] available from NCARB. [the Board or from the National Council of Architectural Registration Boards, 1735 New York Avenue, N.W., Suite 700, Washington, D.C. 20006.]

§ 9.41a. Adoption of National Board Examinations.

- (a) The Board has adopted the ARE given by NCARB. Candidates for examination shall obtain applications directly from NCARB and pay the fee for the examination directly to NCARB.
- (b) Candidates shall comply with examination procedures and conduct standards as established by NCARB.

§ 9.46. Requirements for examination eligibility.

A candidate for the examination shall have:

- (1) A professional degree in architecture from an accredited program.
- (2) Three years of diversified training experience demonstrated by training requirements of the IDP.
- (3) An architectural degree candidate applying for first time licensure is required to pass the entire professional licensure examination of the Board within 5 years of the date of [notice by the Board of] eligibility to take the examination. The Board may waive this requirement upon proof of medical hardship or other extraordinary circumstances.

§ 9.49a. Diversified training requirements.

- (a) The Board has adopted NCARB Training Requirements for IDP. [as set forth in Appendix B to the 1985-1986 NCARB Circular of Information No. 1. The 1985-1986

NCARB Circular of Information No. 1] This information is available from[: National Council of Architectural Registration Boards, 1735 New York Avenue, N.W., Suite 700, Washington, D.C. 20006.] NCARB.

(b) The candidate shall keep records of required diversified training experience in accordance with NCARB IDP requirement. The candidate is responsible for having NCARB transmit a certificate of completion of IDP to the Board. [as part of the candidate's application. An application which does not contain a certificate will not be reviewed.]

GRADING AND REVIEW

§ 9.51. Examination Grading.

The ARE shall be graded using procedures developed by NCARB in consultation with a professional testing organization. Examination results shall be recorded by the Board in the record of the candidate and shall be maintained in accordance with § 9.27 (relating to inactive records).

§ 9.52. Grading Compilation.

To qualify for licensure, a candidate shall receive a passing grade on each part or division of the examination. Grades received in individual parts or divisions will not be averaged. A candidate will have opportunities, subject to § 9.46(3) (relating to requirements for examination eligibility), to retake those portions of the examination which were failed.

EXAMINATION

§ 9.111. [Dates of examination.

The ARE shall be given on dates and in the form as made available to the Board by the NCARB.] “(Reserved.)”

§ 9.113. [Location of examination site.

The ARE shall be given at locations determined by the Board in conjunction with the NCARB.] “(Reserved.)”

§ 9.114. [Due notice.

A candidate eligible to take the examination will be given due notice of the date, time and place of examinations and will be given specific preexamination instructions. Candidates may schedule and reschedule examinations in accordance with NCARB Administration Procedures. The NCARB will notify candidates of scheduling deadlines and costs of rescheduling at the time the candidate first is scheduled to take the examination.] “(Reserved.)”

§ 9.116. [Admittance.

A candidate shall present his admission letter and form of positive identification for admittance to the examination. Candidates shall comply with examination procedures and conduct standards as established by NCARB.] “(Reserved.)”

§ 9.117. [Proctors.

The professional testing organization will arrange for proctors at an examination whose duty it is to administer the conduct of the examination. Candidates will be given specific instructions as to conduct which will be deemed to constitute suspected cheating. A candidate found to have engaged in suspected cheating shall be dismissed from the examination. Proof of the activity may result in disqualification to sit for future examinations.] “(Reserved.)”

§ 9.118. [NCARB standard examination; transition candidate.

- (a) The examination will be the ARE in computer-administered form as adopted by the NCARB.
- (b) A candidate who did not successfully complete the entire examination in written format will be required to complete only the computer-administered portions which were not successfully completed in written format.
 - (1) A candidate who has not passed both parts of Division B: Site Design on or before June 30, 1996, will be required to successfully complete the Site Planning part.

- (2) A candidate who did not successfully complete Division C: Building Design on or before June 30, 1996, will be required to successfully complete the Building Planning and Building Technology parts.] “(Reserved.)”

GRADING AND REVIEW

§ 9.131. [Examination grading.]

The ARE shall be graded using procedures developed by NCARB in consultation with a professional testing organization. Examination results shall be recorded by the Board in the record of the candidate and shall be maintained in accordance with § 9.27 (relating to inactive records).] “(Reserved.)”

§ 9.132. [Grading compilation.]

To qualify for licensure, a candidate shall receive a passing grade on each part or division of the examination. Grades received in individual parts or divisions will not be averaged. A candidate will have unlimited opportunities, subject to § 9.46(3) (relating to requirements for examination eligibility), to retake those portions of the examination which were failed.] “(Reserved.)”

COMPARISON ARCH firm renewal FEES

FEE COMPARISON					
ARCHITECT FIRM RENEWAL FEE					
	PA	NJ	NY	MD	OH
(annual renewal)	50	500 (biennial)	35	30	25

FEE REPORT FORM

Agency: State - BPOA

Date: 7/2/2001

Contact: David Williams

Phone No. 783-7194

Fee Title, Rate and Estimated Collections:

Architect Firm Practice Registration Annual Renewal Fee: \$50.00

Estimated Biennial Revenue: \$200,000.00 (2,000 firms x \$100)

(The \$50.00 annual renewal fee will be collected on a biennial basis)

Fee Description:

The fee will be charged to every applicant for registration renewal.

Fee Objective:

The fee should defray a portion of the operational costs of the State Board of Architects.

Analysis, Comment, and Recommendation:

It is recommended that an annual renewal fee of \$50.00 be established to renew firm practice registrations, thereby causing registered architecture firms to contribute to the operational costs of the Board.



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE ARCHITECTS LICENSURE BOARD**

**Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
(717) 783-3397**

March 21, 2002

The Honorable John R. McGinley, Jr., Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harrisstown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

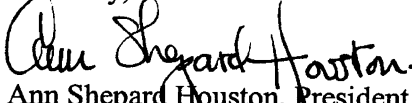
Re: Proposed Regulation
State Architects Licensure Board
16A-416: Annual Renewal Fee for Registered Architecture Firms

Dear Chairman McGinley:

Enclosed is a copy of a proposed rulemaking package of the State Architects Licensure Board pertaining to an annual renewal fee for registered architecture firms.

The Board will be pleased to provide whatever information the Commission may require during the course of its review of the rulemaking.

Sincerely,


Ann Shepard Houston, President
State Architects Licensure Board

ASH/RLS/kmh

Enclosure

cc: Albert H. Masland, Commissioner
Bureau of Professional and Occupational Affairs
John T. Henderson, Jr., Chief Counsel
Department of State
Joyce McKeever, Deputy Chief Counsel
Department of State
Philip Zarone, Regulatory Counsel
Department of State
Gerald S. Smith, Senior Counsel in Charge
Department of State
Roberta L. Silver, Counsel
State Architects Licensure Board
State Architects Licensure Board

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE
REGULATORY REVIEW ACT**

I.D. NUMBER: 16A-416

SUBJECT: State Architects Licensure Board - Annual Renewal Fee for Registered Architecture Firms

AGENCY: DEPARTMENT OF STATE

TYPE OF REGULATION

X Proposed Regulation

Final Regulation

Final Regulation with Notice of Proposed Rulemaking Omitted

120-day Emergency Certification of the Attorney General

120-day Emergency Certification of the Governor

Delivery of Tolled Regulation

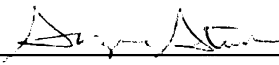
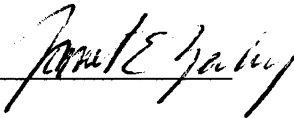
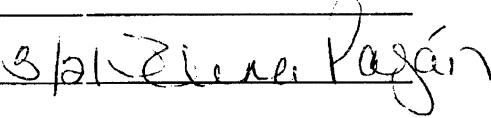
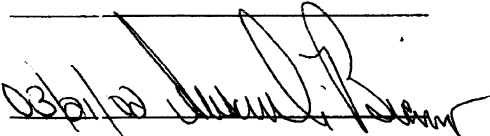
a. With Revisions

b.

Without Revisions

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FILING OF REGULATION

DATE	SIGNATURE	DESIGNATION
3/21/02		HOUSE COMMITTEE ON PROFESSIONAL LICENSURE
3/21/02		SENATE COMMITTEE ON CONSUMER PROTECTION & PROFESSIONAL LICENSURE
3/21/02		INDEPENDENT REGULATORY REVIEW COMMISSION
		ATTORNEY GENERAL
03/21/02		LEGISLATIVE REFERENCE BUREAU

March 7, 2002