

# AIA Pennsylvania

A Society of The American Institute of Architects

RECEIVED

# 2629

2008 JUL 22 AM 7:31

INDEPENDENT REGULATORY  
REVIEW COMMISSION



July 21, 2008

Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Re: No. 2629 State Architects Licensure Board #16A-419:  
Requirements for Examination Eligibility

To whom it may concern:

The American Institute of Architects of Pennsylvania (AIA PA) is pleased to submit written comments on the proposed regulation No. 2629 State Architects Licensure Board #16A-419. AIA PA's comments are limited to the proposed revisions applicable to the State Architects Licensure Board.

As background, AIA PA was founded in 1909 and is the statewide society of the American Institute of Architects. AIA PA has 2800 architect and associate members in the Commonwealth. Although separately incorporated, AIA PA is linked to the national American Institute of Architects.

The above-referenced proposed regulations were published by the State Architects Licensure Board (Board) pursuant to Section 6(a) and (d) of the Architects Licensure Law, 63 P.S. §§ 34.6(a) and (d). Traditionally, the Architects Licensure Law and the Board's rulemaking procedures have granted deference to the National Council of Architecture Registration Boards (NCARB) standards. *See* 49 Pa. Code § 9.11 (providing for Board membership in NCARB) and § 9.41a (providing that candidates shall comply with examination procedures and conduct standards established by NCARB).

The proposed change to the regulations seeks to adopt the NCARB's national "rolling clock". During NCARB's 2004 Annual Meeting, the Council passed a resolution officially creating a "rolling clock" requirement for the Architect Registration Examination (ARE). NCARB's Procedures & Documents Committee recommended a rolling clock after extensively studying the issue. By establishing this standard, NCARB Member Boards recognize that the practice of architecture changes over time. Likewise, ARE content, its format, and its administration can change over time as well.

Long before NCARB introduced this resolution, nine State Boards had already implemented a rolling clock requirement, among them Texas, Delaware, and South Carolina. With

NCARB's adoption of a national rolling clock requirement there will be a uniform standard for all jurisdictions, thus facilitating reciprocity.

Essentially, the Pennsylvania State Architects Licensure Board has been applying this "rolling clock" standard on a case-by-case basis. AIA PA supports the Board's proposed adoption of the "rolling clock" as a formal regulation as set forth in the proposed rulemaking.

If you have any questions, please do not hesitate to contact, Caroline Boyce or myself.

Very truly yours,



Caroline E. Boyce  
Executive Director



Elmer B. Burger, II, AIA, LEED, AP  
President

cc: B. Merenda  
D. Connell