

December 4, 2012

Richard Lim, Director  
Small Business Regulatory Review Board (SBRRB)  
Department of Business and Economic Development and Tourism  
No 1 Capitol District Building, 250 South Hotel Street, 5<sup>th</sup> floor,  
Honolulu, HI 96813



RE: December 10, 2012 1 pm, Meeting of SBRRB: New Business Item IV.C. Proposed amendments to HAR Title 16 Chapter 115 (EASLA)

**JOINT TESTIMONY IN STRONG SUPPORT OF EASLA draft rule change to amend HRS to allow early eligibility for the Architectural Registration Examination (A.R.E)**

Attention Director Lim and SBRRB Members:

The American Institute of Architects, AIA Honolulu and AIA Hawaii State Council, offer their **strong support** of the proposed amendment to allow for early Architectural Registration Examination (ARE) eligibility HAR §16-115- 54 (a) (3).

The AIA Hawaii State Council represents over 850 AIA members across the state on matters of state-wide interest to the profession. AIA Honolulu is the membership organization on the local level providing services and representing approximately ~ 750 members on the islands of Oahu, Hawaii, Kauai.

This key measure under consideration would allow degree-holders of a bachelor's, master's or higher degree in architecture from a school or college approved by the Board as of satisfactory standing, and who are enrolled in the Intern Development program (IDP), *to sit concurrently for the Architectural Record Examination (ARE).*

**(§16-115- 54) Examination: qualifications, application, fees, documents required.** (a) To be eligible for the [NCARB architectural licensing examination] A.R.E. the person shall:

**INSERT (3): Hold a bachelor's, master's or higher education degree in architecture from a school or college approved by the board as of satisfactory standing, and be enrolled in IDP:**

This important and singular change to the Hawaii Administrative Rules governing the examination qualifications for the NCARB architectural licensing examination (§16-115-54) would have far-reaching positive outcomes that will enhance Hawaii's economy, support many Hawaii small businesses, and strengthen our state's work force:

1. The change would empower architectural interns to achieve their long-term goal of becoming licensed practitioners in their chosen career field of architecture, and ultimately strengthen Hawaii's work force. The existing rule, which make it necessary to have completed all experiential requirements prior to sitting for the ARE, is an unnecessary deterrent to many committed, intelligent and capable candidates who could otherwise begin and complete the exam sooner. Early examination would also enhance integration of the knowledge and skills gained during the intern experience with ongoing studies undertaken in preparation for

the examination.

2. Hawaii is currently losing some of the best and the brightest that are frustrated by Hawaii's outdated administrative rules. There are many anecdotal stories of candidates who have left Hawaii to complete their licensing requirements in State's that allow for this concurrency. Hawaii is one of only 7 jurisdictions across the country which does not allow ARE examination. There are 47 other jurisdictions across the country that enacted this key change, first recommended by the National Council of Architectural Registration Boards (NCARB) for state consideration in 2007.
3. Candidates, who are capable of successfully passing all divisions of the exam, regardless of when they do so, have proven their ability to uphold the health, safety and welfare of the public by virtue of the very nature and intent of the exam. By enabling candidates to get licensed, the EASLA board and the State of Hawaii are fulfilling their key mission to insure the public's welfare. By enabling completion, we reduce the number of design professionals who are working "under the supervision" of someone else in their firm – in many occasions doing all of the work, and yet relying on someone else to officiate their work.
4. Architectural firms across the state, the majority which are small businesses, are benefited by having a larger talent pool of licensed professionals available to fill their growing staffing needs. Hawaii, like the rest of the U.S. has suffered from a severe economic downturn that is thankfully showing signs of improvement. Hawaii architectural firms need "new blood." They need licensed, experienced individuals trained on the latest technologies and advancements in the building industry to stay competitive and to grow their businesses and Hawaii's economy.

We applaud the efforts of the EASLA board to finalize this much anticipated and critical change to support the licensure and practice of architecture in Hawaii. The design and construction industry in Hawaii is a key element of our economic engine and prosperity. This enabling change to the administrative rules governing eligibility for licensure will only serve to strengthen the critical role architects play in protecting the *health, safety and welfare* of our general public in all matters related to the built environment.

Sincerely,



Pip White, AIA  
2012 President, AIA Honolulu



John Fullmer, AIA  
2012/2013 President-elect, AIA Hawaii State Council