Regulatory Analysis

Notice of Intended Action to be published: 193B—Chapter 2
"Licensure"

Iowa Code section(s) or chapter(s) authorizing rulemaking: 544A.29
State or federal law(s) implemented by the rulemaking: Iowa Code chapter 544A

Public Hearing

A public hearing at which persons may present their views orally or in writing will be held as follows:

November 18, 2025	6200 Park Avenue
8 a.m.	Des Moines, Iowa

Information on virtual participation will be available on the Department of Inspections, Appeals, and Licensing's website prior to the hearing.

Public Comment

Any interested person may submit written or oral comments concerning this Regulatory Analysis, which must be received by the Architectural Examining Board no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

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Purpose and Summary

This proposed rulemaking establishes the minimum standards for architecture licensure, including the process for initial licensure, renewal, and reinstatement. These requirements ensure public safety by ensuring that any individual who holds a license has minimum competency. The proposed amendments allow for an individual who does not have a National Architectural Accrediting Board (NAAB) accredited degree to be eligible for initial licensure in Iowa.

Analysis of Impact

1. **Persons affected by the proposed rulemaking:**

- **Classes of persons that will bear the costs of the proposed rulemaking:**

There is no direct cost to the public for this rulemaking. There is a cost to the applicant to comply with the minimum requirements to enter the profession, such as schooling and the application fees.

- **Classes of persons that will benefit from the proposed rulemaking:**

Individuals in the architecture field will benefit from this rulemaking because it will allow for the initial licensure of individuals who meet all requirements for licensure, except for having a NAAB-accredited degree. Currently, the State of Iowa does not allow initial licensure in Iowa for an individual who does not have a NAAB-accredited degree. However, licensure by reciprocity is allowed for an individual licensed in another state, even if that person does not have a NAAB-accredited degree.

2. **Impact of the proposed rulemaking, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred:**

- **Quantitative description of impact:**

Estimation of the cost of education and other licensure requirements to become an Iowa licensed architect is as follows:

1. Education: According to the Association of Collegiate Schools of Architecture, the median tuition per year at a public institution for architecture is $10,125 for a bachelor's degree and $13,339 for a master's degree. At a private institution, the cost is $39,982 for a bachelor's degree and $40,273 for a master's degree.
2. Experience/training: There is not usually a cost for training since intern architects are paid for their work at a firm. Intern architects must pay $100 to the National Council of Architectural Registration Boards (NCARB) to participate in the training program.
3. Examination fee: $1,542 for initial licensure by examination only, paid to NCARB.
4. Licensure by examination application/license fee: $50 plus $5/month until renewal.

Nebraska's license fee is $100 for an initial license. Minnesota's application fee is $75, plus a $120 license fee.

- **Qualitative description of impact:**

In order to regulate and license professions as directed in statute, base standards for licensure are critical to protecting public safety. The cost of inaction would increase the potential for injury to the public by a licensee who is not qualified to perform the work in the field.

3. **Costs to the State:**

- **Implementation and enforcement costs borne by the agency or any other agency:**

Costs to the agency are the staff time needed to manage Board activities, which includes managing applications for initial licenses, renewals, and reinstatements. Staff salaries to support the work of the Board are covered by the Licensing and Regulation Fund established in 2023 Iowa Acts, Senate File 557. Licensing fees go to the fund to cover the operations of the regulated professional licensing boards.

- **Anticipated effect on State revenues:**

Costs associated with implementing this rulemaking are paid by individual licensees, not the State. There is no anticipated impact on State revenues as a result of this rulemaking.

Staff salaries to support the work of the Board are covered by the fund. Licensing fees go to the fund to cover the operations of the regulated professional licensing boards.

4. **Comparison of the costs and benefits of the proposed rulemaking to the costs and benefits of inaction:**

The Board believes all current requirements ensure public safety and ensure a minimum competency of service is provided to Iowans. Licensure requirements could be reduced or eliminated for the purpose of lowering the bar of entry into the profession, but the Board would be concerned about the public safety of Iowans in that scenario. In addition, the chapter provides consistency related to the licensure of architects in other states, which makes obtaining licensure in multiple states simpler for applicants.

5. **Determination whether less costly methods or less intrusive methods exist for achieving the purpose of the proposed rulemaking:**

The Board has not identified a more cost-effective alternative to licensure. The Board believes all current requirements ensure public safety and ensure a minimum competency of care is provided to Iowans. Licensure requirements could be reduced or eliminated for the purpose of lowering the bar of entry into the profession, but the Board would be concerned about the public safety of Iowans in that scenario. In addition, the chapter provides consistency related to the licensure in other states, which makes obtaining licensure in multiple states simpler for applicants. The Board believes the benefits achieved to license this profession justify the costs because licensure ensures that Iowans are able to safely interact with the built environment.

6. **Alternative methods considered by the agency:**

- **Description of any alternative methods that were seriously considered by the agency:**

The Board has not identified a more cost-effective alternative to licensure. While Iowa could deregulate the architecture profession, it would be the only state to do so. The Board believes all current requirements ensure public safety and ensure a minimum competency of care is provided to Iowans. Licensure requirements could be reduced or eliminated for the purpose of lowering the bar of entry into the profession, but the Board would be concerned about the public safety of Iowans in that scenario. Architects make sure that buildings are safe and meet state building codes. In addition, the chapter provides consistency related to the licensure in other states, which makes obtaining licensure in multiple states simpler for applicants.

- **Reasons why alternative methods were rejected in favor of the proposed rulemaking:**

The Board has not identified a more cost-effective alternative to the licensure. While Iowa could deregulate the architecture profession, it would be the only state to do so. The Board believes all current requirements ensure public safety and ensure a minimum competency of care is provided to Iowans. Licensure requirements could be reduced or eliminated for the purpose of lowering the bar of entry into the profession, but the Board would be concerned about the public safety of Iowans in that scenario. Architects make sure that buildings are safe and meet state building codes. In addition, the rule provides consistency related to the licensure in other states, which makes obtaining licensure in multiple states simpler for applicants.

Small Business Impact

If the rulemaking will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rulemaking on small business:

- Establish less stringent compliance or reporting requirements in the rulemaking for small business.
- Establish less stringent schedules or deadlines in the rulemaking for compliance or reporting requirements for small business.
- Consolidate or simplify the rulemaking's compliance or reporting requirements for small business.
- Establish performance standards to replace design or operational standards in the rulemaking for small business.
- Exempt small business from any or all requirements of the rulemaking.

If legal and feasible, how does the rulemaking use a method discussed above to reduce the substantial impact on small business?

The proposed amendments relate to public safety concerns that are present whether the business is a small business or a large organization. Chapter 2 is meant to ensure public safety in terms of licensing requirements. While some architects likely are running a small business of their own, some also work for large corporations and firms. To exempt a small business from adhering to the chapter would jeopardize any member of the public who sought services from that small business. The risk to the public is greater than the potential harm or cost to the small business.

Text of Proposed Rulemaking

ITEM 1. Amend rule 193B—2.1(544A,17A) as follows:

193B—2.1(544A,17A) Definitions. The following definitions apply as used in Iowa Code chapter 544A, and this chapter of the architectural examining board rules, unless the context otherwise requires.

"Applicant" means an individual who has submitted an application for licensure to the board.

"Approved education program" means a degree accredited by an organization that provides an accreditation system for architecture programs or education deemed equivalent by the board to the National Council of Architectural Registration Boards (NCARB) Education Standard that has been evaluated and found to be an equivalent standard based on the NCARB Alternatives to Education Requirement as identified in the NCARB Certification Guidelines demonstration of successful completion of an Education Evaluation Services for Architects.

"Architectural intern" or *"intern architect"* means an individual who ~~holds a professional degree from a NAAB-accredited program or the equivalent as deemed by the board~~ has completed or is completing an approved education program, has completed or is currently enrolled in the ~~National Council of Architectural Registration Boards (NCARB)~~ NCARB Architectural Experience Program (AXP), and intends to actively pursue licensure by completing the Architect Registration Examination.

"ARE" means the current Architect Registration Examination, as prepared and graded by the NCARB.

"AXP applicant" means an individual who has completed the AXP training requirements set forth in the NCARB Architectural Experience Program Guidelines and has submitted an application for licensure to the board.

"Examination" means the current Architect Registration Examination (ARE) accepted by the board.

"Inactive" means that an architect is not engaged in Iowa in any practice for which a certificate of licensure is required, including architects who have retired from active practice.

"Issuance" means the date of mailing of a decision or order or the date of delivery if service is by other means unless another date is specified in the order.

~~*"NAAB"* means the National Architectural Accrediting Board.~~

"NCARB" means the National Council of Architectural Registration Boards. The NCARB Architect Registration Examination Guidelines, NCARB Architectural Experience Program Guidelines, and NCARB Certification Guidelines are available through the National Council of Architectural Registration Boards, 1401 H Street NW, Suite 500, Washington, D.C. 20005; NCARB's website, www.ncarb.org; or the architectural examining board.

"NCARB Architect Registration Examination (ARE) Guidelines" means the edition of a document by the same title published by the National Council of Architectural Registration Boards in ~~February 2024~~ April 2025. The document outlines the requirements for examination.

"NCARB Architectural Experience Program Guidelines" means the edition of a document by the same title published by the National Council of Architectural Registration Boards in ~~May 2020~~ November 2025. The document outlines the requirements for training.

"NCARB Certification Guidelines" means the edition of a document by the same title published by the National Council of Architectural Registration Boards in July 2022. The document outlines the requirements for licensure as an architect.

"NCARB Education Guidelines" or *"NCARB Education Standards"* means the edition of a document by the same title published by the National Council of Architectural Registration Boards in December 2023. The document outlines the requirements for licensure as an architect.

ITEM 2. Amend subrule 2.2(1) as follows:

2.2(1) ~~*Examination*~~ *Initial licensure*. To be eligible for initial licensure by examination, all applicants will have ~~obtained an accredited professional architectural degree from the NAAB,~~ satisfied the architecture education requirements as detailed in paragraph 2.2(1)*"a,"* have passed all divisions of the ARE ~~prepared and~~ as provided by the NCARB, have completed the NCARB Architectural Experience Program~~,~~ as detailed in paragraph 2.2(1)*"a,"* and have ~~attained~~ established an NCARB council record. A completed NCARB council record shall be transmitted to and filed in the board office. Upon receipt of the council record from NCARB, the board will provide the applicant with an application for licensure form, which must be completed and returned to the board within three

months of receipt of the council record. The board shall issue a license number to the applicant upon receipt of the completed application form and appropriate fee.

a. The education and experience requirements are met when an applicant completes one of the following:

(1) A professional degree in architecture from a program the satisfies the NCARB Education Standard or education deemed equivalent by the board and completion of the NCARB AXP one time.

(2) A degree from a four-year bachelor degree program that includes at least 60 semester credit hours in architecture-related subjects as referenced in the NCARB Certification Guidelines in the Education Alternative section and completion of the NCARB AXP two times.

(3) A two-year associate degree program that includes at least 30 semester credit hours in architecture-related subjects as referenced in the NCARB Certification Guidelines in the Education Alternative section and completion of the NCARB AXP three times.

(4) A high school degree or its equivalent and completion of the NCARB AXP four times.

NOTE: To complete each multiple of the NCARB AXP, the candidate must meet the full program requirements for each multiple as defined in the AXP Guidelines. For example, if a candidate is completing the AXP four times, the candidate must document the required number of hours in each experience area four times. Minimum and maximum hours in each experience setting apply.

~~*a.*~~ *b.* Examinations for licensure as an architect shall be conducted by the board or its authorized representative.

(1) and (2) No change.

~~*b.*~~ *c.* Examination admittance requirements.

~~(1) Have completed the eligibility requirements of the education standards for NCARB certification, which include a professional degree from a program accredited by the NAAB or other NCARB-approved education program, or be a student actively participating in an NCARB-accepted Integrated Path to Architectural Licensure (IPAL) option within an NCARB-approved education program.~~

~~(2) Be enrolled in or have completed the NCARB AXP.~~

(1) An applicant will have established an NCARB record.

(2) NCARB shall notify the testing service of the applicant's eligibility prior to the applicant's scheduling of an examination.

~~*c.*~~ *d.* AXP eligibility requirements will be verified and satisfied in accordance with the NCARB Architectural Experience Program Guidelines. Documentation of AXP training units will be submitted on AXP report forms published by NCARB and will be verified by signatures of the licensed architects serving as the intern architect's supervisors in accordance with the requirements outlined in the NCARB Architectural Experience Program Guidelines. The completed AXP report form shall demonstrate attainment of an aggregate of the minimum number of value units in each training area and shall be submitted to NCARB for evaluation.