

## **Establishing an Equivalent Path to Licensure in Minnesota**

AIA Minnesota is proposing an equivalent path to architect licensure for our state – one that maintains the significant rigor and emphasis on protecting the public health, safety, and welfare of the current path while offering expanded education-through-experience options that have long been implemented in the 17 other U.S. jurisdictions that have paths to licensure that do not require a NAAB-accredited degree.

We believe this step is necessary to increase the opportunities for qualified applicants to become licensed in Minnesota. Many other states have similar pathways to what we are proposing, and we believe the public benefit of keeping a strong pipeline of prospective architects, in the context of the ever-increasing cost of higher education and competition for STEM talent, is significant.

Minnesota has already expanded pathways for landscape architect licensure<sup>1</sup>, and NCARB continues also supports equivalent pathways to licensure. It is time for Minnesota to embrace this opportunity to strengthen the profession and include a wider group of qualified professionals in our future.

### **Consistent Requirements: Current Path and Equivalent Path**

AIA Minnesota's proposed equivalent path would require passage of all ARE exams and completion of all required AXP hours, as is currently required (and would continue to be) for a prospective licensee with a NAAB-accredited degree.

### **Additional Education-Through-Experience Requirements for Equivalent Path**

The only modification to the current path to licensure AIA Minnesota is proposing is to allow additional supervised experience – overseen and signed off by an architect licensed in Minnesota or another state – for those who have not attained a NAAB-accredited degree to supplement educational achievement at varying levels. The equivalent path proposed does not include automatic acceptance of foreign education; prospective licensees would need to complete the NCARB process for the recognition of a foreign education. This model of additional experience beyond AXP hours for those who hold degrees different from NAAB-accredited degrees is present in nearly all jurisdictions that allow for an equivalent path to licensure.

The additional hours suggested are to be added onto AXP hours; they are not intended to count toward / be a repeat of AXP. This model allows prospective applicants to broaden and deepen their learning through experience with health, safety, and welfare requirements across the spectrum of practice types in which they plan to work. AIA Minnesota also recommends that where additional experience leaves gaps in training for health, safety, and welfare considerations, additional education in the form of AIA-approved continuing education credits and/or community education offered by Minnesota-based schools of architecture be used to round out training.

The recommended additional hours reflect average numbers from the 17 jurisdictions that provide these equivalent paths to licensure and should be calculated as multiple years of additional work at the federal annual hours calculation (2,080), minus 8 holidays and 10 days of time away.

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<sup>1</sup> As adopted in June 2023, allowing additional experience to supplement non-accredited education Minnesota Rules 1800.1500 subpart 4 <https://mn.gov/aelslagid/rulemaking/proposedrules-r04764.pdf>

## **Reciprocity and NCARB Certificate Holders**

AIA Minnesota suggests that existing reciprocity rules should continue to apply among U.S. jurisdictions, with the amendment that those registered architects from other states who do not have a NAAB-accredited degree must have completed the ARE and the required work experience hours, performed in any US jurisdiction, to be signed off by the Minnesota AELSLAGID licensing board. Prospective licensees who hold an NCARB certificate would continue to be eligible for reciprocal licensing consideration.

## **Short-Term Lookback for Equivalent Path**

AIA Minnesota requests that for the first two years following the adoption of the equivalent path to licensure, a lookback period for prospective applicants to include as part of their licensed architect reviewed hours should be available to avoid restarting the clock for professionals who have completed significant work in the field.

## **Portfolio Review Not Recommended**

AIA Minnesota explored the portfolio review concept and found that it is not commonly used in other jurisdictions with equivalent paths to licensure. It also introduces a significant additional workload for the AELSLAGID Board and may create subjectivity concerns that limit the Board's ability to consistently apply rules. Therefore, AIA Minnesota does not believe adding portfolio review is necessary or appropriate in the equivalent path.

## **Additional Examination Not Recommended**

AIA does not recommend additional examination or interview elements for architects licensed under the proposed equivalent path. These additional requirements would create significant additional workload and are not commonly used in other jurisdictions that allow for equivalent paths to licensure.

## **Other Considerations**

Administrators of the Minnesota schools of architecture with NAAB-accredited degree programs were actively-engaged members of the task force that developed this recommendation and support its advancement to expand pathways for design professionals in architecture to become licensed.

AIA Minnesota is prepared to work with the AELSLAGID Board to: establish criteria for architect signoff of hours beyond AXP; educate the design community about the opportunity and the significant investment of time involved for design professionals wishing to utilize and to support individuals pursuing the equivalent pathway; remain connected to NCARB as they further refine recommendations for equivalent paths to licensure (as related to foreign-educated architects and design professionals, in particular); and support implementation efforts in any other way the Board requests.