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Fast-Track Regulation Agency Background Document

Agency name	Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers & Landscape Architects (APELSCIDLA)
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC10-20
VAC Chapter title(s)	Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers and Landscape Architects Regulations
Action title	HB 2154/SB 1310 Amendment (Architect Education Alternative)
Date this document prepared	January 27, 2026 (Revised March 2, 2026, and April 1, 2026)

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Order 19 (2022) (EO 19), any instructions or procedures issued by the Office of Regulatory Management (ORM) or the Department of Planning and Budget (DPB) pursuant to EO 19, the Regulations for Filing and Publishing Agency Regulations (1 VAC 7-10), and the *Form and Style Requirements for the Virginia Register of Regulations and Virginia Administrative Code*.

Brief Summary

Provide a brief summary (preferably no more than 2 or 3 paragraphs) of this regulatory change (i.e., new regulation, amendments to an existing regulation, or repeal of an existing regulation). Alert the reader to all substantive matters. If applicable, generally describe the existing regulation.

This action amends provisions of the Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers and Landscape Architects (“APELSCIDLA”) Regulations to implement changes resulting from the enactment of Chapters [534](#) and [541](#) of the 2025 Acts of Assembly.

The General Assembly enacted House Bill (HB) 2154 / Senate Bill (SB) 1310, which created § 54.1-406.1 of the Code of Virginia mandating the Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers, and Landscape Architects (“the Board” or “Board for APELSCIDLA”) establish an alternative pathway to licensure for architects who do not hold a professional degree from a NAAB-accredited program. The law directs the Board to adopt regulations creating work and education experience equivalencies as an alternative to the NAAB degree requirement.

The regulation establishes a credit system for combinations of work and education experience, requires a minimum of 10 years of qualifying education experience and work experience, and directs applicants to certify work and education experience annually.

Acronyms and Definitions

Define all acronyms used in this form, and any technical terms that are not also defined in the "Definitions" section of the regulation.

"AIA" means American Institute of Architects.

"APELSCIDLA" means Architects, Professional Engineers, Land Surveyors, Certified Interior Designers and Landscape Architects.

"DPOR" means Department of Professional and Occupational Regulation.

"NAAB" means National Architectural Accrediting Board.

"NCARB" means National Council of Architectural Registration Board.

Statement of Final Agency Action

Provide a statement of the final action taken by the agency including: 1) the date the action was taken; 2) that the agency has "adopted final amendments" to the regulation; 3) the name of the agency taking the action; and 4) the title of the regulation. A suggested statement is, "On [insert date] the Board/Department of [insert name] adopted final amendments to the [title of regulation(s)]."

On August 14, 2025, and March 31, 2026, the Board for APELSCIDLA adopted final amendments to the Board for APELSCIDLA Regulations.

Mandate and Impetus

Identify the mandate for this regulatory change and any other impetus that specifically prompted its initiation (e.g., new or modified mandate, petition for rulemaking, periodic review, or board decision). For purposes of executive branch review, "mandate" has the same meaning as defined in the ORM procedures, "a directive from the General Assembly, the federal government, or a court that requires that a regulation be promulgated, amended, or repealed in whole or part."

Consistent with Virginia Code § 2.2-4012.1, also explain why this rulemaking is expected to be noncontroversial and therefore appropriate for the fast-track rulemaking process.

The statutory mandate for this regulatory action is found in Chapters [534](#) and [541](#) of the 2025 Acts of Assembly which directs the Board to establish regulations for an alternative to the NAAB-accredited degree requirement for architect licensure.

This action is expected to be noncontroversial and appropriate for the fast-track rulemaking process. Virginia AIA, a professional society representing architects, was the principal proponent of the legislation mandating the regulatory change and participated in the development of the regulation. The action is also expected to be supported by the regulant population.

Legal Basis

Identify (1) the promulgating agency, and (2) the state and/or federal legal authority for the regulatory change, including the most relevant citations to the Code of Virginia and Acts of Assembly chapter number(s), if applicable. Your citation must include a specific provision, if any, authorizing the promulgating agency to regulate this specific subject or program, as well as a reference to the agency's overall regulatory authority.

The promulgating agency is the Board for APELSCIDLA. Chapter 4 of Title 54.1 of the Code of Virginia enumerates the legal authority for the Board to administer the licensure and certification of individuals and registration of businesses for the professional services of architecture, professional engineering, land surveying, landscape architecture, and interior design.

Section 54.1-404 of the Code of Virginia states, in part:

A. The Board shall promulgate regulations not inconsistent with this chapter governing its own organization, the professional qualifications of applicants, the requirements necessary for passing examinations in whole or in part, the proper conduct of its examinations, the implementation of exemptions from license requirements, and the proper discharge of its duties.

Section 54.1-404.2 of the Code of Virginia states, in part:

A. The Board shall promulgate regulations governing continuing education requirements for architects, professional engineers, land surveyors, and landscape architects licensed by the Board.

Section 54.1-406.1 of the Code of Virginia states, in part:

A. The Board shall adopt regulations establishing work and education experience equivalencies that shall provide an alternative to the requirement of a professional degree in architecture from a program accredited by the National Architectural Accrediting Board (NAAB) pursuant to 18VAC10-20-110. In establishing an alternative pathway to a NAAB-accredited degree, the Board shall require a minimum of 10 years of qualifying work experience, education experience, or combination of work and education experience.

B. In establishing qualifying work and education experience under this section, the Board shall adopt regulations establishing a credit system to account for varying degrees of work and education experience and such credit system shall be based on the applicability of such work or education experience to the practice of architecture.

C. The Board shall develop requirements for applicants seeking licensure to certify work and education experience on an annual basis.

Section 54.1-201 of the Code of Virginia provides, in part:

A. The powers and duties of regulatory boards shall be as follows:

1. To establish the qualifications of applicants for certification or licensure by any such board, provided that all qualifications shall be necessary to ensure either competence or integrity to engage in such profession or occupation.

5. To promulgate regulations in accordance with the Administrative Process Act (§ 2.2-4000 et seq.) necessary to assure continued competency, to prevent deceptive or misleading practices by practitioners and to effectively administer the regulatory system administered by the regulatory board. The regulations shall not be in conflict with the purposes and intent of this chapter or of Chapters 1 (§ 54.1-100 et seq.) and 3 (§ 54.1-300 et seq.) of this title.

Purpose

Explain the need for the regulatory change, including a description of: (1) the rationale or justification, (2) the specific reasons the regulatory change is essential to protect the health, safety or welfare of citizens, and (3) the goals of the regulatory change and the problems it is intended to solve.

The General Assembly has charged the Board with the responsibility of regulating those who practice or offer to practice as an architect by requiring such individuals obtain a license in order to engage in the profession.

The performing of professional work by those who lack sufficient expertise poses a risk to the public health, safety, and welfare. These risks include the potential for damage to property, personal injury, and death. In addition, the improper performing of professional work can pose a substantial risk of financial harm to property owners and the public, these include costs to remediate defective work.

The goals of this regulatory action are:

1. Align the regulation with statutory requirements by providing a pathway to licensure for individuals who do not have a professional degree in architecture from a program accredited by NAAB.
2. Ensuring that qualified individuals with significant education and work experience may become licensed through an alternative pathway.
3. Protecting the public by requiring substantial verified experience while also broadening access to the profession.

Substance

Briefly identify and explain the new substantive provisions, the substantive changes to existing sections, or both. A more detailed discussion is provided in the "Detail of Changes" section below.

Section 18VAC10-20-105, which provides the requirements for individuals to qualify for licensure as an architect, is to be revised to add an alternative education qualification for individuals to qualify based on prior education and prior work experience, in lieu of a degree from an NAAB-accredited architectural training program. The changes would allow applicants to qualify with at least 10 years of education experience, work experience, or a combination; and establish a credit system to account for varying degrees of work and education experience. The changes also include provisions as to what is considered acceptable education experience and work experience under the alternative education qualification, and require applicants using the alternative education pathway to annually certify their qualifying education and work.

Issues

Identify the issues associated with the regulatory change, including: 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions; 2) the primary advantages and disadvantages to the agency or the Commonwealth; and 3) other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, include a specific statement to that effect.

1. The primary advantages of this regulatory action for the public include expanded access to licensure through a new alternative pathway for individuals who do not hold a NAAB-accredited degree. By recognizing substantial supervised work and education experience, the regulation increases flexibility while maintaining rigorous safeguards that protect public health, safety, and welfare. This ensures that individuals with significant practical training and oversight may qualify for licensure without lowering professional standards.

There are no disadvantages to the public as the regulation continues to require documented education, verified supervised experience, and passage of the NCARB licensing examination to ensure competence. No reduction in public protection is anticipated.

2. The primary benefit to the agency and the Commonwealth is the potential positive economic impact resulting from the introduction of a new pathway to licensure.

No disadvantages to the Commonwealth or the agency have been identified.

3. There are no other pertinent matters of interest to the regulated community, government officials or the public.

Requirements More Restrictive than Federal

Identify and describe any requirement of the regulatory change which is more restrictive than applicable federal requirements. Include a specific citation for each applicable federal requirement, and a rationale for the need for the more restrictive requirements. If there are no applicable federal requirements, or no requirements that exceed applicable federal requirements, include a specific statement to that effect.

There are no applicable federal requirements.

Agencies, Localities, and Other Entities Particularly Affected

Consistent with § 2.2-4007.04 of the Code of Virginia, identify any other state agencies, localities, or other entities particularly affected by the regulatory change. Other entities could include local partners such as tribal governments, school boards, community services boards, and similar regional organizations. "Particularly affected" are those that are likely to bear any identified disproportionate material impact which would not be experienced by other agencies, localities, or entities. "Locality" can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulation or regulatory change are most likely to occur. If no agency, locality, or entity is particularly affected, include a specific statement to that effect.

Other State Agencies Particularly Affected

No other state agencies are particularly affected.

Localities Particularly Affected

No other localities are particularly affected.

Other Entities Particularly Affected

No other entities are particularly affected.

Economic Impact

Consistent with § 2.2-4007.04 of the Code of Virginia, identify all specific economic impacts (costs and/or benefits), anticipated to result from the regulatory change. When describing a particular economic impact, specify which new requirement or change in requirement creates the anticipated economic impact. Keep in mind that this is the proposed change versus the status quo.

Impact on State Agencies

<p><i>For your agency:</i> projected costs, savings, fees or revenues resulting from the regulatory change, including:</p> <ul style="list-style-type: none"> a) fund source / fund detail; b) delineation of one-time versus on-going expenditures; and c) whether any costs or revenue loss can be absorbed within existing resources 	<p>The agency could experience an increase in revenue should individuals elect to become licensed as architects through the alternative education pathway. No additional expenditures are anticipated. The program will be administered by DPOR within existing resources.</p>
<p><i>For other state agencies:</i> projected costs, savings, fees or revenues resulting from the regulatory change, including a delineation of one-time versus on-going expenditures.</p>	<p>No anticipated impact on other state agencies.</p>
<p><i>For all agencies:</i> Benefits the regulatory change is designed to produce.</p>	<p>The regulation expands access to the architecture profession by recognizing substantial professional experience and alternative education as equivalent to a NAAB-accredited degree. This pathway increases opportunities for experienced practitioners to obtain licensure, promotes workforce development, and aligns with the Commonwealth’s goals of reducing regulatory barriers while safeguarding public health, safety, and welfare through competency based standards.</p> <p>DPOR could experience an increase in revenue should individuals elect to become licensed as architects through the alternative education pathway. No benefit to other state agencies is anticipated.</p>

Impact on Localities

If this analysis has been reported on the ORM Economic Impact form, indicate the tables (1a or 2) on which it was reported. Information provided on that form need not be repeated here.

Projected costs, savings, fees or revenues resulting from the regulatory change.	No anticipated costs to localities.
Benefits the regulatory change is designed to produce.	<p>The regulation expands access to the architecture profession by recognizing substantial professional experience and alternative education as equivalent to a NAAB-accredited degree. This pathway increases opportunities for experienced practitioners to obtain licensure, promotes workforce development, and aligns with the Commonwealth's goals of reducing regulatory barriers while safeguarding public health, safety, and welfare through competency-based standards.</p> <p>No specific benefits to localities are anticipated.</p>

Impact on Other Entities

If this analysis has been reported on the ORM Economic Impact form, indicate the tables (1a, 3, or 4) on which it was reported. Information provided on that form need not be repeated here.

Description of the individuals, businesses, or other entities likely to be affected by the regulatory change. If no other entities will be affected, include a specific statement to that effect.	Affected individuals include prospective architect applicants without NAAB-accredited degrees but with significant professional experience or nontraditional education. Affected businesses include architectural firms that may employ or partner with these applicants once licensed. Current licensees are not directly affected.
Agency's best estimate of the number of such entities that will be affected. Include an estimate of the number of small businesses affected. Small business means a business entity, including its affiliates, that: a) is independently owned and operated and; b) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.	As of January 1, 2026, approximately 7,858 architects are licensed by the Board, along with 5,307 APELSCIDLA businesses across all regulated professions. Architecture firms employing these individuals may also be affected. Many architecture firms in Virginia meet the definition of small businesses, though precise estimates are not available. In addition, new applicants who do not hold NAAB-accredited degrees but possess the required qualifying experience will benefit. The exact number of such applicants is uncertain; however, stakeholders have indicated there is public interest in pursuing this alternative pathway.
All projected costs for affected individuals, businesses, or other entities resulting from the regulatory change. Be specific and include all costs including, but not limited to: a) projected reporting, recordkeeping, and other administrative costs required for compliance by small businesses; b) specify any costs related to the development of real estate for commercial or residential purposes that are a consequence of the regulatory change;	Applicants will be required to pay the standard licensing fees and to cover the cost of documenting and certifying their work and education experience on an annual basis, as required by the Board. These costs are expected to be minimal and consistent with existing application procedures. Businesses are not expected to incur any additional costs.

c) fees; d) purchases of equipment or services; and e) time required to comply with the requirements.	
Benefits the regulatory change is designed to produce.	The regulation expands access to the architecture profession by recognizing substantial professional experience and alternative education as equivalent to a NAAB-accredited degree. This pathway increases opportunities for experienced practitioners to obtain licensure, promotes workforce development, and aligns with the Commonwealth’s goals of reducing regulatory barriers while safeguarding public health, safety, and welfare through competency-based standards.

Refer to Table 1(a) of the ORM Form for additional information.

Alternatives to Regulation

Describe any viable alternatives to the regulatory change that were considered, and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the regulatory change. Also, include discussion of less intrusive or less costly alternatives for small businesses, as defined in § 2.2-4007.1 of the Code of Virginia, of achieving the purpose of the regulatory change.

There are no viable alternatives as regulation is required by Chapters 534 and 541 of the 2025 Acts of Assembly. The regulatory changes in this action are applicable to individuals and not business entities. However, individuals impacted by this action may be owners or employees of small businesses as defined in § 2.2-4007.1 of the Code of Virginia.

If this analysis has been reported on the ORM Economic Impact form, indicate the tables on which it was reported. Information provided on that form need not be repeated here.

Regulatory Flexibility Analysis

Consistent with § 2.2-4007.1 B of the Code of Virginia, describe the agency’s analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum: 1) establishing less stringent compliance or reporting requirements; 2) establishing less stringent schedules or deadlines for compliance or reporting requirements; 3) consolidation or simplification of compliance or reporting requirements; 4) establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the regulatory change.

There were no alternative regulatory methods considered as the Board must comply with the mandate to promulgate regulations to implement the requirements of Chapters 534 and 541 of the 2025 Acts of Assembly. The regulatory changes in this action are applicable to individuals and not business entities. However, individuals impacted by this action may be owners or employees of small businesses as defined in § 2.2-4007.1 of the Code of Virginia.

If this analysis has been reported on the ORM Economic Impact form, indicate the tables on which it was reported. Information provided on that form need not be repeated here.

Public Participation

Indicate how the public should contact the agency to submit comments on this regulation, and whether a public hearing will be held, by completing the text below.

Consistent with § 2.2-4011 of the Code of Virginia, if an objection to the use of the fast-track process is received within the 30-day public comment period from 10 or more persons, any member of the applicable standing committee of either house of the General Assembly or of the Joint Commission on Administrative Rules, the agency shall: 1) file notice of the objections with the Registrar of Regulations for publication in the Virginia Register and 2) proceed with the normal promulgation process with the initial publication of the fast-track regulation serving as the Notice of Intended Regulatory Action.

If you are objecting to the use of the fast-track process as the means of promulgating this regulation, please clearly indicate your objection in your comment. Please also indicate the nature of, and reason for, your objection to using this process.

Prior to adopting the regulation, the Board for APELSCIDLA sought public input on the development of the alternative architect education qualifications. The Board posted general notice to Virginia Regulatory Town Hall soliciting public comments. A public comment period was held between May 16, 2025, and June 17, 2025. The Board received comment from one individual. The Board also formed a committee of the Board to consider alternative education qualifications and develop the regulation. Membership of the committee included the Board's licensed architect members and a representative of Virginia AIA.

The Board for APELSCIDLA is providing an opportunity for comments on this regulatory proposal, including but not limited to (i) the costs and benefits of the regulatory proposal and any alternative approaches, (ii) the potential impacts of the regulation, and (iii) the agency's regulatory flexibility analysis stated in this background document.

Anyone wishing to submit written comments for the public comment file may do so through the Public Comment Forums feature of the Virginia Regulatory Town Hall web site at: <https://townhall.virginia.gov>.

Comments may also be submitted by mail, email or fax to:

Kate Nosbisch
Executive Director
9960 Mayland Drive
Perimeter Center, Suite 400
Richmond, VA 23233
APELSCIDLA@dpor.virginia.gov
(866) 465-6206 (fax)

In order to be considered, comments must be received by 11:59 pm on the last day of the public comment period.

A public hearing will not be held.

Detail of Changes

List all regulatory changes and the consequences of the changes. Explain the new requirements and what they mean rather than merely quoting the text of the regulation. For example, describe the intent of the language and the expected impact. Describe the difference between existing requirement(s) and/or agency practice(s) and what is being proposed in this regulatory change. Use all tables that apply, but delete inapplicable tables.

If an existing VAC Chapter(s) is being amended or repealed, use Table 1 to describe the changes between existing VAC Chapter(s) and the proposed regulation. If existing VAC Chapter(s) or sections are being repealed and replaced, ensure Table 1 clearly shows both the current number and the new number for each repealed section and the replacement section.

Table 1: Changes to Existing VAC Chapter(s)

Current chapter-section number	New chapter-section number, if applicable	Current requirements in VAC	Change, intent, rationale, and likely impact of new requirements
20-105	N/A	<p>This section outlines the qualifications required for licensure as an architect in Virginia. Applicants may apply for licensure upon completing the necessary education, experience, and examination requirements set forth by the Board.</p> <p>To meet the education requirement, applicants must hold a professional degree in architecture from a program accredited by the NAAB. The program must have achieved accreditation no later than two years after the applicant's graduation date.</p> <p>For those with degrees that are not NAAB-accredited, whether foreign or domestic, applicants must establish a record with the NCARB and have their academic credentials evaluated for equivalency through NAAB's evaluation service. The Board maintains discretion to reject any evaluation, and applicants are responsible for all related costs.</p>	<p>The education requirement for architect licensure is amended.</p> <p>The section is amended to require that an applicant for licensure hold a high school diploma or equivalent and provide documentation verifying that the applicant has met one of three educational qualifications established in the section.</p> <p>An applicant may qualify by meeting either of the existing requirements for those who hold a professional degree in architecture from an NAAB-accredited program, or those with a degree that is not NAAB-accredited.</p> <p>This action creates a new pathway that allows an applicant to qualify with at least 10 years of education experience, work experience, or a combination of education and work experience.</p> <p>The Board is establishing a credit system to account for varying degrees of work and education experience. The credit system is outlined in a table. Applicants may combine work experience and education experience as follows:</p> <ul style="list-style-type: none"> • An architecture baccalaureate degree, to include architectural design will count for four (4) years of education credit. An applicant must have six (6) years of

			<p>qualifying work experience or other education experience.</p> <ul style="list-style-type: none"> • A baccalaureate degree in a related discipline (engineering, interior design, landscape architecture, or building construction) will count for three (3) years of education experience. An applicant must have seven (7) years of qualifying work experience or other education experience. • A non-related baccalaureate degree will count for two (2) years of education experience. An applicant must have eight (8) years of qualifying work experience or other education experience. • An associate’s degree in the field of architecture will count for one (1) year of education experience. An applicant must have nine (9) years of qualifying work experience or other education experience. <p>Applicants may apply multiple degrees to receive education experience credit. For example, an applicant may apply an associate’s degree (one year of credit) and an architecture baccalaureate degree (four years of credit); for a total of five years of education credit. The applicant would still need to have five years of qualifying experience to reach the required 10 years of total education and work experience.</p> <p>However, an applicant would not receive credit for combining degrees if a lower degree was applied toward completion of a higher degree. For example, if an applicant completed an associate’s degree that was then used toward completion of a baccalaureate degree, the applicant would only receive credit for one of these degrees.</p> <p>Applicants will be required to submit official transcripts, and the Board retains authority to review the program to determine whether the degree qualifies as a related discipline.</p> <p>Graduate coursework in the field of architecture, related disciplines, and NAAB-accredited coursework may also be credited. Applicants may receive one</p>
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			<p>(1) year of education experience for each successfully completed full-time equivalent academic year for a graduate degree in the field of architecture. Applicants may receive six (6) months of education experience for each successfully completed full-time equivalent academic year for a graduate degree in a related discipline (i.e. engineering, interior design, landscape architecture, or building construction.) Applicants may receive one (1) year of education experience for each successfully completed full-time equivalent academic year for completed NAAB-accredited coursework.</p> <p>Applicants will receive work experience credit for work experience gained under the supervision of a licensed architect. The work experience must have been gained in 14 specific areas to qualify.</p> <p>An applicant may not combine work experience used to qualify to meet the alternative education pathway to then meet the separate architectural experience requirement for licensure specified in the section. Any experience used by an applicant to meet the experience requirement in the section would need to be in addition to any work experience used to meet the alternative education qualification.</p> <p>Applicants using the alternative education pathway must certify and report their qualifying education and work annually by January 31 for the preceding year.</p> <p>Definitions for the terms “education experience” and “work experience” as they are used in the alternative education pathway provisions are provided.</p>
20-9998	N/A	This section contains forms used to administer the regulation.	The forms section is updated to reflect changes to the regulation.