



Virginia Department of Planning and Budget **Economic Impact Analysis**

18 VAC 10-20 Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers and Landscape Architects Regulations
Department of Professional and Occupational Regulation
Town Hall Action/Stage: 6967 / 11113
April 4, 2026

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with § 2.2-4007.04 of the Code of Virginia (Code) and Executive Order 19. The analysis presented below represents DPB’s best estimate of the potential economic impacts as of the date of this analysis.¹

Summary of the Proposed Amendments to Regulation

Pursuant to a 2025 legislative mandate,² the Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers and Landscape Architects (Board) seeks to “establish an alternative pathway to licensure for architects who do not hold a professional degree from a program accredited by the National Architecture Accrediting Board (NAAB). The law directs the Board to adopt regulations creating work and education experience equivalencies as an alternative to the NAAB degree requirement.”

Background

The current regulation requires applicants to either (i) hold a professional degree in architecture from an NAAB-accredited program, or (ii) to have a non-accredited degree (or coursework) evaluated for NAAB-equivalency by the National Council of Architectural Registration Boards (NCARB) at the applicant’s expense. The current regulation states that the

¹ Code § 2.2-4007.04 requires that such economic impact analyses determine the public benefits and costs of the proposed amendments. Further the analysis should include but not be limited to: (1) the projected number of businesses or other entities to whom the proposed regulatory action would apply, (2) the identity of any localities and types of businesses or other entities particularly affected, (3) the projected number of persons and employment positions to be affected, (4) the projected costs to affected businesses or entities to implement or comply with the regulation, and (5) the impact on the use and value of private property.

² See <https://townhall.virginia.gov/L/ViewAction.cfm?actionid=6967>.

Board reserves the right to reject any evaluation submitted. In addition to the education requirements, the current regulation also has a work experience requirement and an examination requirement, which are required by the NCARB. These work experience requirement and examination requirements were not addressed by the 2025 legislation, nor would they be amended by this regulatory action.³

There are currently only three educational institutions in Virginia that offer NAAB-accredited professional programs in architecture: Virginia Tech offers a five-year bachelor's program as well as a master's program, Hampton University offers a five-year master's program (for undergraduate enrollment), and the University of Virginia offers a three-year master's program (for graduate enrollment).⁴ However, the University of Virginia and Norfolk State university offer non-accredited bachelor's degrees in architecture, and at least six community colleges offer associates degrees in architecture or related fields.⁵ The Department of Professional and Occupational Regulation (DPOR) reports that the NAAB-accreditation process is rigorous and costly to schools, which in turn restricts the opportunities available to individuals who want to become licensed architects.

Chapters 534 and 541 of the 2025 *Acts of Assembly* added § 54.1-406.1 to the Code of Virginia, directing the Board to establish an alternative to the current education requirement for the licensure of architects. The legislation specifically directs the Board to (i) require a minimum of ten years of qualifying work experience, education experience, or combination of work and education experience; (ii) establish a credit system to account for varying degrees of work and education experience based on the applicability of such experience to the practice of architecture; (iii) develop requirements for applicants seeking licensure to certify work and education on an annual basis. Further, the legislation requires the Board to review applicants' past work and education experience in addition to the annual reporting until July 1, 2028.

³ The experience and examination components are required by the NCARB; more details can be found at <https://www.ncarb.org/sites/default/files/AXP-Guidelines.pdf>; this hyperlink is included in the regulation.

⁴ See <https://naab-dir.weaveaccreditation.com/>.

⁵ Richard Bland College (Architecture and Related Services), Northern Virginia Community College (Architecture Technology), Brightpoint Community College (Architectural Engineering Technology), J Sargeant Reynolds Community College (Architectural and Engineering Technology – Building Construction Management Specialization), Central Virginia Community College (Engineering – Architectural/Civil), and Tidewater Community College (Architectural Drafting and Design Technology). These were found on the State Council for Higher Education's Education Wizard:

DPOR reports that AIA [American Institute of Architects] Virginia, a professional society representing architects, was the principal proponent of the legislation mandating this regulatory change and participated in the development of the regulation. Information shared with the Board by AIA VA indicates that the legislation was motivated by a desire to increase and diversify the workforce and number of architects in Virginia, while continuing to protect the health, safety, and welfare of the public. The alternative pathway is intended to support individuals who cannot afford the expenses/debt of higher education and individuals who acquire knowledge differently. The 2025 legislation and proposed regulation would align Virginia with 17 other states that allow an alternative path.⁶

Pursuant to the legislative mandate, the Board seeks to establish an alternative education pathway by creating the following credit system:

- A baccalaureate degree in architecture or architectural design provides four years of credit, requiring six years of supplemental work or education experience.
- A baccalaureate degree in a related discipline provides three years of credit, requiring seven years of supplemental work or education experience. (“Related disciplines” include engineering, interior design, landscape architecture, and building construction.)
- A non-related baccalaureate degree provides two years of credit, requiring eight years of supplemental work or education experience.
- An associate’s degree in the field of architecture provides one year of credit, requiring nine years of supplemental work or education experience.

The proposed language would prohibit double counting of education experience in the alternative pathway when an applicant has more than one degree by not allowing lower degrees, such as an associate degree, to be counted separately if credits from that degree were applied toward a higher degree, such as a baccalaureate degree. In that case, only the baccalaureate degree would be counted. However, credits for two non-overlapping baccalaureate degrees, or for a baccalaureate degree in a related or non-related discipline and an associate’s degree in architecture could be combined.

⁶ See <https://www.ncarb.org/earn-a-degree/study-architecture/accredited-programs/education-alternatives>.

In addition, applicants may be awarded one year of education experience for each completed full-time equivalent academic year for a graduate degree in the field of architecture or six months of education experience for each completed full-time equivalent academic year for a graduate degree in a related discipline, defined above. Applicants may also be awarded one year of education experience for each successfully completed full-time equivalent academic year for NAAB accredited coursework.

The proposed language would also (i) specify that all work experience must have been gained under the supervision of a licensed architect and (ii) provide a list of activities/areas for the work experience to meet the statutory requirement of being “applicable to the practice of architecture.”

To meet the annual certification requirement in statute, the proposed language would require education and/or work experience to be reported on a board-approved form by January 31 for the preceding year. The Department of Professional and Occupational Regulation (DPOR) reports that the Board has an Architect Experience Verification Form and an Architect Degree Verification Form, both of which may be submitted annually with no fee. Procedurally, DPOR reports that Board staff will send letters at the beginning of December each year to remind applicants who have applied through this new pathway to resubmit their experience and degree verification forms, and that candidates will be asked to submit a transcript to verify the completion of a degree.

Estimated Benefits and Costs

A “license wage premium” for a professional license refers to the additional wages earned by a license-holder relative to individuals in the same field with the similar educational backgrounds, skills, and experience who do not possess a license. Thus, the benefits and costs of the alternative pathway include its impact on the magnitude and distribution of the license wage premium.

Individuals who seek an architect license but cannot qualify for it under the current pathways would now have the option to utilize the alternative pathway. These individuals would benefit from the alternative pathway as long as the expected license wage premium accrued over the remainder of their careers is greater than any upfront costs resulting from the required education and the efforts to find appropriate work experience.

Thus, the alternative pathway offers the greatest benefit to future high school graduates who would be able to refer to the proposed credit system and accordingly decide exactly what combination of education and work experience would be most appropriate, accessible, and affordable. For example, if high school graduates using the alternative pathway are able to become licensed roughly 15 years after graduating high school (ten years for the alternative pathway plus five years for the NCARB's experience and examination requirements), they would be expected to accrue the license wage premium over the longest time horizon. In contrast individuals who use the alternative pathway to make a mid-career transition would have less time to accrue the license wage premium.

However, individuals who already meet some or all of the requirements of the alternative pathway could apply for licensure with the Board at any point (once the regulation becomes effective) as long as they are able to provide transcripts and verify that their work experience was obtained under a supervision of a licensed architect and included the areas described in the regulation. Early- or mid-career applicants may require additional years of work experience credit; they would benefit from the alternative pathway provided that the expected license wage premium accrued over the remainder of their careers is greater than any upfront costs associated with finding or switching jobs to obtain the appropriate work experience.

On the other hand, graduates of NAAB-accredited professional programs (NAAB graduates) would face increased competition, both pre-licensure when seeking employment to meet the NCARB work experience requirement and subsequently when seeking employment as licensed architects. NAAB graduates seeking licensure must currently complete 3,740 hours of work experience, as required by the NCARB and the current regulation, of which a minimum of 1,860 hours must be work performed for an architecture firm under the direct supervision of an architect licensed in a U.S. or Canadian jurisdiction. As mentioned previously, this experience requirement would also apply to individuals seeking licensure under the alternative pathway after they have acquired 10 years' worth of credit.

In the short run, unless there was some growth in the employment opportunities for candidates specifically seeking work experience under a licensed architect, the competition for such jobs would intensify and wages for unlicensed workers in these positions would be expected to fall. While this would benefit licensed architects (or firms) by expanding their hiring

pool and suppressing the wages they could offer, there may be a glut of candidates to sort through and the quality of candidates from the new alternative pathway may be unpredictable. As a result, in the medium run, it may take longer for candidates to meet the experience requirements (and then pass the exam) which could suppress the growth of applications for initial licensure.⁷ In the long run, as the alternative pathway gradually increases the overall supply of licensed architects in the market, the resulting increase in competition will cause the license wage premium to shrink unless (a) the demand for licensed architects increases or (b) the supply of licensed architects is simultaneously decreased by attrition or retirement by current license-holders.

Thus, although the legislation and proposed regulation could benefit a number of individuals who would not otherwise have had a pathway to licensure, the long term effects would make the profession more competitive and could suppress wage growth for both licensed architects as well as candidates for licensure seeking work experience. At the same time, colleges offering non-NAAB accredited degrees, including community colleges offering associates degrees, in architecture and/or related fields, may benefit from higher enrollment in those programs, whereas NAAB-accredited programs may see a decrease in applicants.

Businesses and Other Entities Affected

As described above, the proposed amendments would directly affect applicants seeking initial licensure as an architect under the alternative pathway, architects or firms that would employ candidates seeking work experience under the alternative pathway, and non-NAAB accredited programs that offer bachelor's or associate's degrees in architecture or related fields. NAAB-accredited programs and their graduates would be indirectly affected as described above.

The number of individuals who may seek licensure under the alternative pathway is currently unknown. However, the Board received an average of 144 applicants by exam per year between 2023-2025. AIAVA reported to the Board that roughly two percent of initial applicants in Virginia do not hold an NAAB degree and that this number is roughly twenty to thirty percent

⁷ It should be noted that most license applicants in Virginia apply through comity (soon to be considered "endorsement"). DPOR reports that over a three-year period, beginning January 1, 2023, and ending December 31, 2025, the Board received an average of 144 applicants by exam per year, and an average of 354 applicants by comity per year.

in states that already allow alternative pathways to licensure; this would imply an additional 25 to 40 new applicants per year.

DPOR reports that as of January 1, 2026, approximately 7,858 architects are licensed by the Board; however, the number of licensed architects who are able to employ others and supervise their work may be significantly smaller. Employers would benefit from an increase in the number of candidates seeking work experience. Lastly, the following schools, which offer non-NAAB accredited programs may benefit from a growth in applicants/enrollment: The University of Virginia, Norfolk State University, Richard Bland College, Northern Virginia Community College, Brightpoint Community College, J Sargeant Reynolds Community College, Central Virginia Community College, and Tidewater Community College.

The Code of Virginia requires DPB to assess whether an adverse impact may result from the proposed regulation.⁸ An adverse impact is indicated if there is any increase in net cost or reduction in net benefit for any entity, even if the benefits exceed the costs for all entities combined.⁹ As described above, NAAB graduates seeking employment to meet the work experience requirements for licensure would face greater competition and lower wages; in the long run, the license wage premium for architects could shrink. However, since these reductions in benefits result from the 2025 legislative mandate, an adverse impact from this regulatory change is not indicated.

Small Businesses¹⁰ Affected:¹¹

DPOR reports that there are 5,307 APELSCIDLA businesses across all regulated

⁸ Pursuant to Code § 2.2-4007.04(D): In the event this economic impact analysis reveals that the proposed regulation would have an adverse economic impact on businesses or would impose a significant adverse economic impact on a locality, business, or entity particularly affected, the Department of Planning and Budget shall advise the Joint Commission on Administrative Rules, the House Committee on Appropriations, and the Senate Committee on Finance.

⁹ Statute does not define “adverse impact,” state whether only Virginia entities should be considered, nor indicate whether an adverse impact results from regulatory requirements mandated by legislation. As a result, DPB has adopted a definition of adverse impact that assesses changes in net costs and benefits for each affected Virginia entity that directly results from discretionary changes to the regulation.

¹⁰ Pursuant to § 2.2-4007.04 of the Code of Virginia, small business is defined as “a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.”

¹¹ If the proposed regulatory action may have an adverse effect on small businesses, Code § 2.2-4007.04 requires that such economic impact analyses include: (1) an identification and estimate of the number of small businesses subject to the proposed regulation, (2) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the proposed regulation, including the type of professional skills necessary for preparing required reports and other documents, (3) a statement of the probable effect of the proposed

professions, all of which likely fall within the meaning of “small business” as defined in Virginia Code § 2.2-4007.1. However, as mentioned previously, the proposed amendments would benefit small businesses by increasing their hiring pool.

Localities¹² Affected¹³

The proposed amendments do not disproportionately affect particular localities or directly affect costs for local governments.

Projected Impact on Employment

The proposed amendments would likely increase the number of candidates seeking employment under a licensed architect, as well as eventually increasing the number of licensed architects seeking employment.

Effects on the Use and Value of Private Property

The proposed amendments could marginally increase the value of firms that would employ candidates seeking employment under a licensed architect or firms that employ licensed architects by reducing their hiring costs. However, the value of these firms may decrease if they eventually face greater competition for the same clients or projects. If wages for licensed architects eventually decrease, or architects’ wage growth is suppressed, as a result of an increase in the supply of architects, this may marginally reduce real estate development costs.

regulation on affected small businesses, and (4) a description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation. Additionally, pursuant to Code § 2.2-4007.1, if there is a finding that a proposed regulation may have an adverse impact on small business, the Joint Commission on Administrative Rules shall be notified.

¹² “Locality” can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulatory change are most likely to occur.

¹³ § 2.2-4007.04 defines “particularly affected” as bearing disproportionate material impact.