
**SENATE COMMITTEE ON
BUSINESS, PROFESSIONS AND ECONOMIC DEVELOPMENT**
Senator Angelique Ashby, Chair
2025 - 2026 Regular

Bill No:	AB 759	Hearing Date:	July 14, 2025
Author:	Valencia		
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Urgency:	No	Fiscal:	Yes
Consultant:	Yeaphana La Marr		

Subject: Architects: architects-in-training

SUMMARY: Authorizes a candidate for licensure as an architect who has successfully passed the first division of the licensure examination, to use the title, “architect-in-training” for three years while meeting additional licensure requirements. Prohibits continued use of the title after January 1, 2032, and repeals the provisions on January 1, 2036.

Existing law:

- 1) Establishes the Architects Practice Act (Act) to regulate the practice of architecture in California. (Business and Professions Code (BPC) §§ 5501 et seq.)
- 2) Establishes, until January 1, 2029, the CAB within the Department of Consumer Affairs (DCA) to administer and enforce the Architects Practice Act. (BPC § 5510)
- 3) Defines “architect” as a person who is licensed to practice architecture in this state under the authority of the Act. (BPC § 5500)
- 4) Defines the practice of architecture as offering or performing, or being in responsible control of, professional services which require the skills of an architect in the planning of sites, and the design, in whole or in part, of buildings, or groups of buildings and structures. Architect’s professional services may include any or all of the following: investigation, evaluation, consultation, and advice; planning, schematic and preliminary studies, designs, working drawings, and specifications; coordination of the work of technical and special consultants; compliance with generally applicable codes and regulations, and assistance in the governmental review process; technical assistance in the preparation of bid documents and agreements between clients and contractors; contract administration; and construction observation. (BPC § 5501)
- 5) Makes it a misdemeanor, punishable by a fine of not less than \$100 nor more than \$5,000, or by imprisonment in a county jail not exceeding one year, or by both that fine and imprisonment, for any person who is not licensed to practice architecture to practice architecture in this state, to use any term confusingly similar to the word architect, to use the stamp of a licensed architect, or to advertise or put out any sign, card, or other device that might indicate to the public that the person is an architect, is qualified to engage in the practice of architecture, or is an architectural

designer. (BPC § 5536)

- 6) Requires a person to file their application for examination with the Board and pay the application fee, as specified, before taking the licensing examination. (BPC § 5550)
- 7) Requires an applicant for a license to practice architecture to not have committed acts or crimes constituting grounds for denial of a license, as specified, and provide evidence of having completed eight years of training and educational experience in architectural work. A five year degree from a school of architecture approved by the CAB is equivalent to five years of training and educational experience in architectural work. (BPC § 5552)

Existing Regulations:

- 1) Grants candidates training credit only when:
 - a) The supervising professional is licensed or registered in a United States jurisdiction or a Canadian province and the work experience is obtained or the project is located in a United States jurisdiction or Canadian province, or
 - b) The supervising professional is licensed or registered in a qualifying foreign country where the work experience is obtained or the project is located.

(Title 16 of the California Code of Regulations. (16 CCR), § 117 (c)(2))

- 2) Requires every candidate to earn at least one year of training credit for experience as or under the direct supervision of an architect(s) licensed or registered in a United States jurisdiction granted at 100% credit or at least two years of experience under the direct supervision of an architect(s) registered in a Canadian province granted at 50% credit. (16 CCR, § 117 (c)(4))

This bill:

- 1) Specifies that a person may apply to the CAB and obtain authorization to use the title “architect-in-training” once they have been identified as a candidate for licensure by the Board and have successfully passed at least one division of the Architect Registration Examination (ARE), as developed by the National Council of Architectural Registration Boards (Council).
- 2) Prohibits any abbreviation or derivative of the title “architect-in-training,” other than “AIT,” from being used.
- 3) Prohibits a person from using the title “architect-in-training” to independently offer or provide architectural services to the public.
- 4) Specifies that notwithstanding any other law, the Board may disclose a person’s authorization to use the title “architect-in-training” to a member of the public upon request.

- 5) States that unlawful use of the title “architect in training” may constitute unprofessional conduct and subject the user of the title to administrative action, including, but not limited to, citation, discipline, and denial of a license.
- 6) Authorizes the Board to charge a fee, not to exceed the reasonable cost to evaluate whether a candidate meets the requirements to use the title “architect-in-training.”
- 7) Limits how long a person may use the title “architect-in-training” to four years after approval by the Board, but allows a person to reapply for another four years if the person has passed another division of the examination during the four years immediately preceding reapplication.
- 8) Includes a January 1, 2036, sunset date of the provisions to allow a person to submit an application to use the title, “architect-in-training” and prohibits a person from applying to the CAB to obtain authorization to use the title “architect in training” on or after January 1, 2032.
- 9) Delays the bill’s implementation to January 1, 2027.
- 10) Repeals the section added by the bill effective January 1, 2036.

FISCAL EFFECT: This bill is keyed fiscal by Legislative Counsel. According to the Assembly Committee on Appropriations, the Board estimates needing limited-term funding of \$264,000 in FY 2026-2027 and \$248,000 in FY 2027-28 to support two positions to cover licensing and enforcement duties until it collects sufficient revenue to support the positions. The DCA Office of Information Services reports one-time absorbable costs of approximately \$6,000 to create a new basic application in Connect, DCA’s online application system.

COMMENTS:

1. **Purpose.** This bill is sponsored by the American Institute of Architects – California. The Author states, “Architectural candidates face significant challenges due to the extended timeline required to obtain a license. On average, it takes 13.3 years to complete this process, leading many aspiring architects to abandon their training and studies after just 5 years, roughly halfway through the requirements. This issue is further compounded by disparities in licensure timelines. AB 759 seeks to improve attrition for all candidates in the architectural profession by allowing them to use the title “Architect-in-Training.” By creating title protection for architectural candidates we will encourage them to complete licensure, ensure professionals receive the same recognition as other industries, and enable more job recruitment.”
2. **Background.** Generally, to become a licensed architect, a total of eight years of architectural training and education experience is required for licensure (BPC § 5552). Up to five years may be substituted with education on a year for year basis. The candidate must successfully take all divisions of the Architect Registration Examination (ARE), as well as the California Supplemental Examination. This bill would provide title protection for aspiring architects by allowing the unlicensed architect to use the title “architect-in-training” for three years after having completed

five years of education and/or experience and successfully taken the first division of the ARE.

The sponsors state, “This bill aims to promote diversity and encourage candidates to complete the licensure process, while also aligning these individuals with other esteemed career paths and industries.” Promoting diversity is an admirable goal; however, it is unclear how this bill would promote diversity. The National Council of Architectural Registration Boards (NCARB) reports [demographics](#) showing significant strides have been made toward reaching a diverse license population. In fact, NCARB data show 81% of new architects are under the age of 40, 47% of candidates identify as a person of color, and 46% of candidates identify as women. Of new architect licensees, NCARB reports 1 in 3 is a person of color and 2 in 5 are women. While NCARB reports a difference in time to obtain a license among racial groups, the gap is six months between shortest and longest timeframes. White candidates obtain their license in quickest timeframe of 12.9 years while Hispanic or Latino candidates earn their license in the longest timeframe of 13.5 years. This is a significant improvement from 2020 when there was approximately a three year disparity between groups.

Further, the purpose of title protection is to allow individuals who have attained a specific level of qualifications, education and experience to use a title. Unlike a license, which gives the practitioner authority to work in the given profession, title protection gives the beneficiary of title protection an advantage in the marketplace when competing against others who perform the same work without title protection.

There would be no similar benefit for an “architect-in-training” who would be working under a licensed architect (as required for licensure) because they would be employed under the supervision of a licensed architect as a condition of licensure. An “architect-in-training” would not be in the marketplace operating independently like other professions with title protection so it is not clear why title protection is necessary in this instance.

Comparison to "Engineer-in-Training". This bill would grant title protection to an unlicensed population of aspiring architects. This bill’s language is modeled after the Board for Professional Engineers, Land Surveyors, and Geologists’ (Engineers) engineer-in-training certificate. The engineer-in-training title is a certification that is used to identify those who have passed the first division of the examination, typically after their third year in school (see BPC § 6751(a)(3)) and was historically imposed by schools as a graduation requirement; however, schools have been eliminating the requirement that a student obtain the engineer-in-training certification prior to graduation. There is no similar graduation requirement for architect students to meet so there is no similar impetus to grant a title to an unlicensed individual.

Additionally, obtaining the engineer-in-training certificate is a required step in the process to become licensed as a professional engineer (BPC § 6751(c)(3)). Becoming an architect-in-training is not a requirement of licensure and consequently, should not be compared to the engineer-in-training certificate. Similarly, the BPELSG requires a land surveyor-in-training, which is also used for

comparison, but obtaining the certificate is a necessary step in the licensure process for those professions (BPC §§ 8741(d)(4)).

Prior legislation to create an AIT. AIA-CA sponsored SB 1132 (Galgiani of 2016), which was similar to this bill. That bill was vetoed by Governor Brown, whose veto message stated, “In May 2015, this very same Board discouraged the use of any title that implied a person was an architect, stating ‘architects are those who have met all the requirements to become licensed. Everyone else is not an architect.’ I agree with this assessment.”

Most recently, the Legislature considered this proposal as part of the Board’s 2024 sunset review. Committee staff recommended that the Board discuss the pros and cons of the proposal and advise the Assembly Business and Professions Committee and the Senate Business, Professions and Economic Development Committee on efforts to reduce barriers to entering the profession. The proposal was ultimately not included in SB 1452 (Ashby, Chapter 482, Statutes of 2024), the Board’s sunset review bill, based on the trend of state policy moving away from title protection and a lack of enforcement mechanisms in the proposal.

Effective and Sunset Dates. This bill contains a delayed implementation date of January 1, 2027, to allow the Board to create an application in its online application system, Connect, which has been under development for a number of years.

To allow the Board, stakeholders, and the Legislature to reassess whether allowing the “architect-in-training” title leads to reduced attrition, particularly in underrepresented demographics. This bill would allow the Legislature to review the title’s efficacy and determine whether a continued title for an unlicensed population is justified for this particular license.

3. **Related Legislation.** SB 1132 (Galgiani of 2016) would have allowed individuals to use the title architect-in-training if they had earned a high school diploma and were enrolled in the National Council of Architectural Registration Board’s Experience Program. *This bill was vetoed by the Governor.*

SB 1452 (Ashby, Chapter 482, Statutes of 2024), extended the sunset date for the CAB and the Landscape Architects Technical Committee (LATC) to January 1, 2029, and enacted technical changes, statutory improvements, and policy reforms in response to issues raised during the CAB’s and the LATC’s sunset review.

4. **Arguments in Support.** The American Institute of Architects (sponsor) writes, “The process of becoming a licensed architect in California is lengthy and rigorous, requiring at least five years of education, three years of supervised experience, completion of the Architectural Experience Program (AXP), and passing the Architect Registration Examinations (ARE) (6 individual exams) along with the California Supplemental Exam. This process results in an average time to licensure of just over 13 years according to the National Council of Architectural Registration Boards (NCARB). Despite these significant milestones, individuals on this path are currently prohibited from using any variation of the title “architect.” Instead, they must adopt generic job titles such as “designer” or “intern,” which fail to appropriately recognize their specialized expertise and commitment to the

profession. AB 759 proposes a much-needed change by allowing those who have passed the first division of the ARE to use the title “Architect-in-Training” (AIT).”

5. Policy Comments and Suggested Amendments.

Without enforcement, there is no reason for title protection. While this bill authorizes the Board to take enforcement action when an architect-in-training title is used without having Board approval, there are no other actions that would subject the individual using the title to be disciplined. Thus, the “architect-in-training” could perform any scope and not face consequences, for example, when that work is performed incompetently or recklessly in violation of BPC § 5585.

Because an architect-in-training is not an architect, the candidate should be supervised by a licensed architect who would be held responsible for any wrongdoing by an architect-in-training under their charge. Existing law requires an applicant to submit evidence of having completed eight years of training and educational experience (up to five years of education can be deemed five years of training) (BPC § 5552).

Board regulations require that experience to demonstrated on an Employment Verification Form (Title 16 of the Code of California Regulations, § 109(b)(10). The Employment Verification Form states applicants “must submit this form to document training (work) experience under the direct supervision of a licensed architect.” Consequently, to qualify to use the title of architect-in-training, a candidate should also demonstrate that they are working under the direct supervision of a licensed architect and that architect knows they are responsible for all work performed by the architect-in-training as a condition of approval. Amendments would require supervision to be similarly demonstrated to the Board. Finally, the sunset date should be extended by one year to coincide with the Board’s presumed sunset dates. As such, the bill should be amended according to the following:

Amend Business and Professions Code § 5500.2 to read:

5500.2. (a)(1) A person may apply to the board and obtain authorization to use the title “architect-in-training” once they have been identified as a candidate for licensure by the board and have successfully passed at least one division of the examination described in Section 5550.

(2) An applicant to obtain authorization to use the title “architect-in-training” must submit the name and license number of the licensed architect responsible for supervising the “architect-in-training” while using the title.

(3) The supervising architect must agree to be responsible for the work performed by the “architect-in-training” by submitting a form, as required by the board, prior to board approval.

(4) If the supervising architect changes, the “architect-in-training” must notify the board of the change, including the name and license number of the new supervisor, within 30 days.

(5) An applicant may request that the board place their authorization to use the title “architect-in-training” on inactive status during any period in which they are not under the supervision of a licensed architect. The board may reactivate the

authorization upon receipt of the name and license number of a new supervising architect, without requiring the applicant to reapply or pay an additional fee.

(b) An abbreviation or derivative of the title “architect-in-training,” other than “AIT,” shall not be used.

(c) A person shall not use the title “architect-in-training” to independently offer or provide architectural services to the public.

(d) Notwithstanding any other law, the board may disclose a person’s authorization to use the title “architect-in-training” to a member of the public upon request.

(e) The use of the title “architect-in-training” in violation of this section may constitute unprofessional conduct and subject the user of the title to administrative action, including, but not limited to, citation, discipline, and denial of a license.

(f) The board may charge a fee, not to exceed the reasonable cost to the board, to evaluate whether a candidate meets the requirements to use the title “architect-in-training.”

(g) (1) A person may use the title “architect-in-training” for no more than four years after approval by the board.

(2) A person may apply to the board and obtain authorization to use the title “architect-in-training” a second time if the person has passed a division of the exam described in Section 5500 in the four years immediately preceding the person’s application.

(h) A person shall not apply to the board to obtain authorization to use the title “architect-in-training” on or after January 1, ~~2032~~2033.

(i) This section shall become operative on January 1, 2027.

(j) This section shall remain in effect only until January 1, ~~2036~~2037, and as of that date is repealed.

Add Section 5587 to the Business and Professions Code to read as follows:

5587. The board may, upon its own initiative or upon the receipt of a complaint, investigate the actions of any “architect-in-training” and make findings thereon. The board may suspend or revoke approval to use the title “architect-in-training” if:

(1) A supervising licensed architect is no longer responsible for work performed by the “architect-in-training” regardless of who ended the supervision arrangement.

(2) The “architect-in-training” has committed any act of fraud, deceit, or misrepresentation in obtaining the “architect-in-training” certificate or authority as an architect.

(3) The “architect-in-training” violates any provision of this chapter or any regulation adopted by the board pursuant to this chapter or aids or abets any person in the violation of any provision of this chapter or any regulation adopted by the board pursuant to this chapter.

Add Section 5587.5 to the Business and Professions Code to read as follows:

5587.5. A licensed architect who is responsible for supervising an “architect-in-training” is subject to disciplinary action for violations of this chapter committed by the “architect-in-training” within the course and scope of their employment.

SUPPORT AND OPPOSITION:

Support:

American Institute of Architects - California

Opposition:

None received

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