

Regulatory Analysis Form (Completed by Promulgating Agency) (All Comments submitted on this regulation will appear on IRRC's website)		INDEPENDENT REGULATORY REVIEW COMMISSION RECEIVED Independent Regulatory Review Commission November 24, 2025	
(1) Agency Department of State, Bureau of Professional and Occupational Affairs, State Architects Licensure Board		IRRC Number: 3468	
(2) Agency Number: 16A Identification Number: 4120			
(3) PA Code Cite: 49 Pa. Code §§ 9.2, 9.3, 9.61, 9.62, 9.65, 9.66, 9.93 and 9.211			
(4) Short Title: Licensure by Endorsement			
(5) Agency Contacts (List Telephone Number and Email Address): Primary Contact: Marc J. Farrell, Regulatory Counsel, Department of State, P.O. Box 69523, Harrisburg, PA 17106-9523; phone (717) 783-7200; marcfarrel@pa.gov. Secondary Contact: Ashley B. Goshert, Board Counsel, State Architects Licensure Board, P.O. Box 69523, Harrisburg, PA 17106-9523; phone (717) 783-7200; agoshert@pa.gov.			
(6) Type of Rulemaking (check applicable box): ☒ PROPOSED REGULATION ☐ Final Regulation ☐ Final Omitted Regulation		☐ Emergency Certification Regulation; ☐ Certification by the Governor ☐ Certification by the Attorney General	
(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less) This proposed rulemaking effectuates 63 Pa.C.S. § 3111 (relating to licensure by endorsement) for applicants licensed in other jurisdictions where the licensure requirements are substantially equivalent to or exceed those established by the Board. The Board is required to determine methods of demonstrating competency, including completion of continuing education or experience in the profession/occupation for at least 2 of the preceding 5 years, and must establish, by regulation, the expiration of provisional endorsement licenses. This proposed rulemaking sets forth eligibility criteria for licensure by endorsement, the specific methods required to demonstrate competency, and requirements for provisional endorsement licenses.			

(8) State the statutory authority for the regulation. Include specific statutory citation.

63 Pa.C.S. § 3111(a) requires licensing boards and commissions to issue a license, certificate, registration or permit to an applicant, provided the applicant is licensed in good standing in another jurisdiction and meets the requirements for licensure by endorsement. The Board is proposing regulations to implement § 3111(a)(1)-(5), relating to information required to determine: whether another jurisdiction's standards for licensure are substantially equivalent to or exceed those established by the Board; the methods of demonstrating competency; whether an applicant has committed an act that would be grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice in the profession or occupation in this Commonwealth, and whether such act should be an impediment to licensure; disciplinary actions and whether such discipline should be an impediment to licensure; and the fee as established by the Board by regulation. 63 Pa.C.S. § 3111(b) also requires boards and commissions that issue provisional licenses, certificates, registrations or permits to set the expiration of the provisional endorsement license by regulation.

Section 303(a)-(d) of the Architects Licensure Law (act) (63 P.S. § 34.303(a)-(d)) authorizes the Board to establish reasonable rules and regulations to carry out the provisions of the act, including standards of professional conduct for architects, the examination of applicants, and the issuance of licenses and certificates (including by reciprocity).

Section 506 of the Admin. Code (71 P.S. §186) empowers the heads of all administrative departments, the several independent administrative boards and commissions, the several departmental administrative boards and commissions to prescribe rules and regulations not inconsistent with law, for the government of their respective departments, boards or commissions.

The act of July 1, 2020 (P.L. 575, No. 53) added 63 Pa.C.S. § 3111 as part of the consolidation of the act of July 2, 1993 (P.L. 345, No. 48) (Act 48) (repealed) into 63 Pa.C.S. Chapter 31 (relating to powers and duties). The text of 63 Pa.C.S. § 3111 was originally added to Act 48 by the act of July 1, 2019 (P.L. 292, No. 41) (Act 41).

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation, as well as any deadlines for action.

63 Pa.C.S. § 3111(a)(5) requires the Board to set the fee to be charged by regulation and subsection (b)(2) requires the Board to set an expiration of the provisional endorsement license. Section 2 of Act 41 directed that each licensing board and commission promulgate final regulations implementing Act 41. Otherwise, this rulemaking is not mandated by any Federal or state law or court order, or Federal regulation.

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

The regulation is needed to implement 63 Pa.C.S. § 3111 to provide for licensure by endorsement to applicants from other states, territories and countries. This provision was enacted due to a recognition that licensed professionals from other jurisdictions have difficulty obtaining a license to practice in this Commonwealth. 63 Pa.C.S. § 3111 eliminates unnecessary barriers to licensure for citizens from other

jurisdictions and for military personnel and their spouses while maintaining sufficient safeguards to ensure public protection. 63 Pa.C.S. § 3111 enables boards and commissions under the Bureau of Professional and Occupational Affairs (Bureau) to issue a license by endorsement, and further provides for a provisional endorsement license to quickly move these professionals into the workforce without unnecessary delays, which reduces barriers to employment.

Since the effective date of Act 41 (August 30, 2019), the Board has not received or considered any applications, nor issued any licenses, certificates, registrations or permits, by endorsement under 63 Pa.C.S. § 3111. Licensure by endorsement may not be widely used by architects licensed in the United States and its territories because the National Council of Architectural Registration Boards (NCARB) Certificate offers an established path for multi-state licensing. Holding an NCARB Certificate effectively pre-certifies that an architect has met certain requirements. Because NCARB is a uniform and widely accepted national standard, its certification process facilitates reciprocal licensure and has become the primary method for architects to secure licensure in multiple states. In its simplest form, an architect with an NCARB Certificate who is licensed in State A can obtain a license in State B through a simple process of ordering the transmittal of their NCARB Record to State B. There is no similarly smooth and widely-accepted pathway for individuals licensed outside the United States to become licensed in the U.S., and therefore it is possible this proposed regulation could provide a pathway to licensure in this Commonwealth for architects from other countries.

Based upon the number of applications received since 2019 and the availability of multi-state licensure through NCARB Certification, the Board estimates receiving approximately 0-2 applications for licensure by endorsement under 63 Pa.C.S. § 3111 on an annual basis.

(11) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations.

There are no federal standards applicable to the subject matter of the regulation.

(12) How does this regulation compare with those of the other states? How will this affect Pennsylvania's ability to compete with other states?

This regulation will not adversely affect Pennsylvania's ability to compete with other states. The purpose of 63 Pa.C.S. § 3111 is to make it easier for out-of-state applicants, including military spouses, who have an out-of-state professional or occupational license to work in Pennsylvania. The purpose of 63 Pa.C.S. § 3111 is also to reduce barriers to employment, which will make Pennsylvania more competitive. 63 Pa.C.S. § 3111 and the Board's proposed regulations will encourage skilled workers and their families to move to Pennsylvania, which will enhance the workforce, provide more talent for businesses and help grow Pennsylvania's economy. Surrounding states also have similar laws and regulations for licensure by endorsement in the professional architecture field.

In comparing the proposed regulation to other states, the Board researched states in the Northeastern region of the United States. The Board identified one other state (New Jersey) as having a comprehensive license by endorsement law applicable to the various professional licensing boards in New Jersey. Similar to 63 Pa.C.S. § 3111, New Jersey requires its professional licensing boards to issue a license to any person who holds a current professional or occupational license in good standing in another jurisdiction whose licensure standards are substantially equivalent to the current standards of New Jersey. New Jersey

requires applicants to demonstrate competency through experience in the practice of the profession within the 5 years immediately preceding the filing of the application. 63 Pa.C.S. § 3111 allows for additional methods of demonstrating competency that New Jersey does not, including completion of continuing education. Additionally, unlike the Board's proposed regulations, New Jersey does not provide for the issuance of discretionary provisional endorsement licenses.

The Board also researched whether other state boards of architecture have similar licensure by endorsement laws and regulations applicable to the architect profession. For those states that have similar licensure by endorsement laws and regulations applicable to professional architects, the Board compared other states' standards in areas where the Board is using its discretion in proposing regulations for eligibility requirements (substantial equivalence or other standard), competency methods, and the issuance and expiration of provisional licenses.

In addition to New Jersey, three of the surrounding states have architect provisions for licensure by endorsement/reciprocity that allow for competency through experience, these states being Delaware (5 years with approved degree and 13 years without) and New York (5 years). Two states have provisions for licensure by endorsement/reciprocity that allow for competency to be established through a passing score on the ARE (West Virginia and New York). None of the surrounding states have provisions that allow for licensure by endorsement/reciprocity through proof of having completed a certain amount of continuing education hours. Three of the surrounding states require the applicant's home state to have substantially equivalent licensure requirements to their state (Maryland, Delaware, with options for non-equivalency, and New York). Two states that do not provide for substantial equivalency in licensure by endorsement/reciprocity require either board recognition of the applicant's home state (Ohio and West Virginia).

Additional details are set forth below:

Ohio:

The Ohio Architects Board recognizes an NCARB certificate as evidence of meeting certain qualifications. If an architect holds an NCARB certificate and is registered in another state or jurisdiction recognized by the Ohio Board, they can apply for registration in Ohio by reciprocity. By submitting evidence of their NCARB certificate and registration from a recognized authority, the applicant is exempt from Ohio's training requirements. Ohio does not provide for the issuance of discretionary provisional endorsement licenses.

West Virginia:

An applicant to the West Virginia Board of Architects who holds a current and valid certification issued by NCARB shall be registered without the necessity of complying with the West Virginia Board's requirements, provided the applicant holds a current and valid registration issued by a registration authority recognized by the Board. The West Virginia Board may award reciprocal registration to an applicant who meets the Board's requirements, has passed the Architect Registration Examination (ARE), and has completed 5 years of practical experience after registration as an architect in any states or jurisdictions recognized by NCARB. The practical experience must be obtained either practicing as a registered architect in another jurisdiction or practicing under the direct supervision of a registered architect in any jurisdiction. West Virginia does not provide for the issuance of discretionary provisional endorsement licenses.

Maryland:

The Maryland Board of Architects may issue a license by reciprocity to practice architecture to an individual who is licensed to practice architecture in another state or country, or is certified by NCARB. The applicant must provide adequate evidence that when the applicant became licensed in the other state, the other state's requirements were at least equivalent to those then required by the laws of Maryland. Maryland does not provide for the issuance of discretionary provisional endorsement licenses.

Delaware:

The Delaware Board of Architects will grant a license to an applicant who holds an NCARB certificate. The Board will also grant a license to an applicant who presents proof of current registration in good standing in another jurisdiction whose standards for licensure are substantially similar to those of this State. The Board will even grant a license to an applicant who is licensed in a jurisdiction whose standards are not substantially similar to Delaware's, if: (1) an applicant has held an active license in good standing in the other jurisdiction for a minimum of 5 years and holds a NAAB-accredited professional degree in architecture; or (2) an applicant who has held an active license in good standing in the other jurisdiction for a minimum of 13 years. Delaware does not provide for the issuance of discretionary provisional endorsement licenses.

New York:

New York does not have direct reciprocity with any other U.S. state, territory or foreign country. However, U.S. and Canadian licensed architects who have passed the ARE and who have obtained 5 years of acceptable professional practice following licensure in a U.S. State or Canadian province within the 7 years immediately preceding application are eligible to apply via endorsement. An applicant from another jurisdiction must demonstrate they meet the same requirements as those seeking licensure through examination, presenting evidence to the New York Office of the Professions. New York does not provide for the issuance of discretionary provisional endorsement licenses.

Based on this research relating to other states' licensure by endorsement and/or reciprocity requirements, the Board believes the amendments will not put Pennsylvania at a competitive disadvantage. To the contrary, by allowing applicants to become licensed through endorsement if they can demonstrate competency by experience for at least 2 of the 5 years immediately preceding the date of application, or by completing 24 hours of continuing education during the 24 months immediately preceding the date of application, and by providing for discretionary provisional licenses which allow an applicant to commence practicing in this Commonwealth while the applicant is satisfying remaining requirements for licensure by endorsement, Pennsylvania will be at a competitive advantage over states that do not have licensure by endorsement and/or do not provide for the issuance of a discretionary provisional license. The proposed regulation will lower, not raise, barriers to out-of-state licensees. Of the states that do have licensure by endorsement provisions, the requirements for licensure by endorsement in those states are similar to those of 63 Pa.C.S. § 3111.

(13) Will the regulation affect any other regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

This rulemaking does not affect other regulations of the Board or other state agencies.

(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. (“Small business” is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

The Board discusses its regulatory proposals at regularly scheduled public meetings. Representatives of the professional associations representing the regulated community routinely attend those meetings.

In drafting the proposal, the Board circulated an exposure draft and solicited comments from stakeholders and other interested parties. The Board received comments from the American Institute of Architects – Pennsylvania (AIA-PA), wherein AIA-PA wondered if licensure by endorsement under 63 Pa.C.S. § 3111 might create a path to licensure for applicants from other states, territories or countries that is easier (i.e., less stringent) than the Board’s current requirements for the more traditional, existing pathways to licensure (by examination and by reciprocity). The Board noted it must abide by the statutory mandates of 63 Pa.C.S. § 3111, including the fact that applicants must be licensed in good standing in jurisdictions whose licensing requirements are substantially equivalent to or exceed the requirements of the Board, and must also demonstrate competency by methods determined by the Board. Applicants must also not have committed any act or received any discipline that would warrant refusal, suspension or revocation of a license.

With regard to competency methods, AIA-PA suggested that the Board should add a third option – in addition to experience or education – for applicants to establish competency, namely, a passing score on the Architect Registration Examination (ARE). The Board agreed with the importance of the ARE, but noted that passage of the ARE is already taken into account as a component of the “substantially equivalent” analysis the Board must undertake. The Board looks to the jurisdiction in which the applicant is licensed to determine whether passage of the ARE (or an examination that is substantially equivalent to the ARE) is required. The board chose the two methods identified in 63 Pa.C.S. § 3111 – experience or continuing education – as being acceptable measures of competency, and did not believe it was necessary or appropriate to add passage of the ARE because passage of the examination, standing alone, does not necessarily establish present-day competency. For example, an architect may have passed the examination many years ago, and then done nothing thereafter as far as actively practicing or keeping current with the profession by taking continuing education.

With regard to the documentation needed to support an applicant who chose to demonstrate competency via continuing education, AIA-PA inquired as to whether an AIA-PA Continuing Education Transcript would be acceptable proof of having obtained the necessary 24 hours. The Board anticipates that such documentation would be acceptable, but did not feel it necessary to actually write language into the regulation specifying the AIA-PA CE Transcript.

AIA-PA also raised concerns about architects acting as the “architect of record” and using a seal while practicing under a provisional license. So long as the provisional license holder was following the applicable laws and regulations at the time a document was signed or sealed, any subsequent assessment of that document’s validity should be unaffected by whether or not the provisional license ultimately became a full license.

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation.

How are they affected?

This rulemaking only affects individuals who apply for licensure by endorsement under 63 Pa.C.S. § 3111. For purposes of this rulemaking, the Board estimates that 0-2 individuals will apply for licensure by endorsement on an annual basis.

According to the Small Business Administration (SBA), there are approximately 1,131,036 small businesses in Pennsylvania, which is 99.6% of all Pennsylvania businesses. Of the 1,131,036 small businesses, 228,272 are small employers (those with fewer than 500 employees) and the remaining 902,764 are non-employers. Thus, the vast majority of businesses in Pennsylvania are considered small businesses.

According to the Pennsylvania Department of Labor & Industry (L&I), architects (except landscape and naval) held 126,700 jobs on the national level in 2020 (the most recent year for which data is available). The largest employers of this industry were: architectural, engineering and related services (71%), self-employed workers (17%), government (3%) and construction (3%). Similarly, according to an L&I 2022 report (the most recent year for which data is available), the largest employers of architects (except landscape and naval) within this Commonwealth were architectural, engineering and related services (80.20%), self-employed workers as a primary job (10.89%) and the federal government (1.43%).

Small businesses are defined in section 3 of the Regulatory Review Act (71 P.S. § 745.3), which provides that a small business is defined by the SBA's Small Business Size Regulations under 13 CFR Ch. 1 Part 121. These size standards have been established for types of businesses under the North American Industry Classification System (NAICS). In applying the NAICS standards to the types of businesses where architects may work, a business classified as "architectural services" (NAICS code 541310) is considered a small business if it has \$12.5 million or less in average annual receipts. Businesses classified as "engineering services" (NAICS code 541330) are considered small businesses if they have \$25.5 million or less in average annual receipts. Businesses classified as "drafting services" (NAICS code 541340) are considered small businesses if they have \$9.0 million or less in average annual receipts. Professionals who are self-employed obviously work in small businesses.

The Board does not collect data relating to business size generally, nor does it collect information on the size of the businesses where its licensees are employed specifically. Nevertheless, in view of the small business thresholds set by NAICS for the businesses in which architects work, the Board believes that the majority of architects in the Commonwealth work in "small businesses" as that term is defined by the SBA and the Regulatory Review Act. Moreover, for purposes of determining the economic impact on small businesses, the Board must assume that a large number of its licensees either are, or work for, small businesses.

This rulemaking only affects individuals seeking licensure by endorsement under 63 Pa.C.S. § 3111. These individuals would be impacted by the \$30 application fee (for individuals licensed in jurisdictions that require NCARB certification) or \$50 (for individuals licensed in jurisdictions that do not require NCARB certification). However, these fees are the same as those currently charged by the Board for individuals applying for licensure by reciprocity with, or without, NCARB certification, respectively. Whether small businesses will be impacted by the regulation depends on whether the businesses would pay the application fee for licensure by endorsement and whether employers would voluntarily pay the costs of completing competency requirements, which may include completion of continuing education courses. Because the application fees and other costs are incurred by individuals applying for initial licensure by endorsement, any business (small or otherwise) could avoid these costs by requiring employees to pay their own

licensure costs.

The Board believes this proposed rulemaking will have a positive impact in that it is implementing 63 Pa.C.S. § 3111, which provides an additional pathway to licensure that previously did not exist.

(16) List the persons, groups or entities, including small businesses, that will be required to comply with the regulation. Approximate the number that will be required to comply.

Applicants for licensure by endorsement as a professional architect will be required to comply with the rulemaking. The Board estimates that 0-2 licensure by endorsement applications will be considered each year. Small businesses will only be impacted to the extent they voluntarily pay licensure fees and other costs for applicants.

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

The Commonwealth will benefit from licensure by endorsement under 63 Pa.C.S. § 3111. The purpose of 63 Pa.C.S. § 3111 is to make it easier for out-of-state applicants, including military spouses, who have an out-of-state professional or occupational license to work in Pennsylvania. 63 Pa.C.S. § 3111 also reduces barriers to employment, which will make Pennsylvania more competitive. 63 Pa.C.S. § 3111 and the Board's regulations will encourage skilled workers and their families to move to Pennsylvania, which will enhance the workforce, provide more talent for businesses and help grow Pennsylvania's economy.

The citizens of Pennsylvania will also benefit from the enhanced workforce and growth in the economy while still having assurance of a level of competence on par with existing licensees in this Commonwealth. The Board has selected methods of competence, including experience and continuing education. These methods assure competency because they show that the applicant has remained current with technological advancements and other updates within the profession, and has the requisite knowledge and skills to practice as an architect.

The financial impact of the regulation falls primarily on applicants for licensure and the Board. Individuals seeking licensure by endorsement will incur costs associated with qualifying for and obtaining a license. As noted above, an applicant applying for licensure by endorsement under 63 Pa.C.S. § 3111 would be required to pay an application fee, which covers the costs of processing the application. This fee would be \$30 for applicants licensed in jurisdictions that require NCARB certification, or \$50 for applicants licensed in jurisdictions that do not require NCARB certification. For the latter, additional review is undertaken to determine whether the other jurisdiction's laws and regulations require something substantially equivalent to NCARB certification. As set forth in amended § 9.3 (relating to fees), the application fees for licensure by endorsement are the same as those incurred by applicants for licensure by reciprocity, depending upon whether the applicant holds or does not hold NCARB certification. There may be additional costs associated with demonstrating competency through continuing education, as there would be the cost of registration for continuing education courses. For foreign applicants, if the other law, regulation or other rule is in a language other than English, § 9.65(a)(1)(ii) would require the applicant to have it professionally translated at the applicant's expense. To date, the Board has not yet received any applications under 63 Pa.C.S. § 3111 from applicants licensed in other countries or territories.

The positive impact for the applicants is that 63 Pa.C.S. § 3111 and the proposed regulation provide a new pathway to licensure that did not previously exist.

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

As previously discussed, 63 Pa.C.S. § 3111 benefits this Commonwealth, its citizens and individual applicants wishing to obtain licensure. The costs associated with obtaining licensure are outweighed by the need of the Board to set fees to cover its costs for processing applications to maintain the fiscal integrity of the Board, and by the equity of assessing the costs of processing applications to the applicants themselves, as opposed to the existing licensee population bearing these costs through increased biennial renewal fees. The General Assembly contemplated and weighed the impact of imposing fees on applicants in 63 Pa.C.S. § 3111(a)(5) against the benefits of providing an additional pathway to licensure to individuals from other jurisdictions. While avoiding economic impact to applicants is always preferable, the General Assembly recognized that board fees are necessary in order to pay for the costs associated with the filing of applications. Additionally, whether an applicant obtains licensure via one of the Board's existing pathways or by licensure by endorsement under 63 Pa.C.S. § 3111, applicants face the same costs (i.e., application fee, Criminal History Records Check (CHRC) fee); therefore, any additional cost to a licensure by endorsement applicant will be minimal, if any.

Regarding the cost of translating the law, regulation or other rule to English, this is a necessary part of the application process. If the Board is unable to understand the other jurisdiction's requirements, it will not be able to determine whether those requirements are substantially equivalent. To date, the Board has not received any licensure by endorsement applications that required a translation of the law, regulation or rule into English, nor does the Board anticipate that many, if any, applicants will incur this cost. Nevertheless, the Board anticipates that the cost of translation would be approximately \$25 per page with the length ranging between two and five pages. Applicants for licensure by endorsement would incur fees for a CHRC; however, applicants incur this fee regardless of whether they apply by endorsement or by a more traditional pathway such as licensure by examination.

Regarding costs associated with demonstrating competency, the Board is authorized to select the appropriate methods of competency under 63 Pa.C.S. § 3111(a)(2) and has provided applicants with two alternatives. Applicants who demonstrate competency through experience in the practice of professional architecture in one or more substantially equivalent jurisdictions for at least 2 of the 5 years immediately preceding the filing of their application will incur no costs to demonstrate competency. Applicants who demonstrate competency by completing 24 hours of continuing education during the 24 months immediately preceding the filing of their application may incur costs associated with any continuing education course registration fees.

Regardless of which alternative the applicant chooses, the costs that may be incurred would be outweighed by the benefits of this proposed regulation. Moreover, demonstrating competency is a statutory requirement; it helps to ensure applicants are safe to practice the profession and will not present a danger to the public.

(19) Provide a specific estimate of the costs and/or savings to the **regulated community** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

An individual applying for licensure by endorsement under 63 Pa.C.S. § 3111 will incur some costs,

including paying a \$30 or \$50 application fee and a fee associated with conducting a criminal background check – currently \$22 for a Pennsylvania CHRC obtained through the Pennsylvania State Police (PSP), plus additional CHRC fees charged by any other states in which an applicant has lived, worked or completed professional training/studies for the past 5 years. These are fees/costs that all applicants for licensure must endure, not just those applying for licensure by endorsement under 63 Pa.C.S. § 3111. Since the effective date of 63 Pa.C.S. § 3111, the Board has not considered or approved any licensure by endorsement applications. Therefore, during this period, the total costs incurred for application fees was \$0. Based upon this information, the Board anticipates that 0-2 licensure by endorsement applications will be considered each year, which will result in approximate application costs in the amount of \$60 annually for those who are licensed in a jurisdiction that requires NCARB certification (2 applicants x \$30 application fee) or \$100 annually for those who do not hold are licensed in a jurisdiction that does not require NCARB certification (2 applicants x \$50 application fee).

If an applicant chooses to demonstrate competency by experience in 2 of the last 5 years, there should be no added costs. Applicants who choose to demonstrate competency through continuing education may have to pay the cost of course registrations for some or all of the required 24 credit hours. Registration fees for continuing education courses can vary widely, from \$0 (free) to many hundreds of dollars. Assuming a cost of \$30 per credit, the cost for the full 24 credit hours of continuing education would be \$720 (24 credits x \$30 per credit). If two applicants chose to demonstrate competency through continuing education each year, this would result in approximate continuing education costs of \$1,440 annually (2 applicants x \$720 each). In some instances, an applicant may have already accumulated some or all of the needed credits as part of maintaining their license in the jurisdiction(s) in which they are licensed, in which case the applicant would incur no, or lower, costs to demonstrate competency by continuing education. Finally, an applicant who needed to have a jurisdiction's laws or regulations translated into English may incur translation fees of approximately \$25 per page with the average length expected to range between two and five

Below are cost estimates for the application fee, CHRC fee and various combinations of competency methods (exclusive of any translation costs):

Applicants licensed in jurisdictions that require NCARB certification (\$30 application fee):

Applicant who demonstrates competency *via experience*: \$30 application fee + \$22 CHRC = \$52 per applicant, multiplied by two applicants = **\$104** annually

Applicant who demonstrates competency *via C.E.* and *has already accumulated all 24 credits*: \$30 application fee + \$22 CHRC = \$52 per applicant, multiplied by two applicants = **\$104** combined total, annually

Applicant who demonstrates competency *via C.E.* and *needs to accumulate all 24 hours* (assuming a rate of \$30 per credit): \$30 application fee + \$22 CHRC fee + \$720 C.E. course registration fees = \$772 per applicant, multiplied by two applicants = **\$1,544** combined total, annually

Applicants licensed in jurisdictions that do not require NCARB certification (\$50 application fee):

Applicant who demonstrates competency *via experience*: \$50 application fee + \$22 CHRC = \$72 per applicant, multiplied by two applicants = **\$144** annually

Applicant who demonstrates competency *via C.E.* and *has already accumulated all 24 credits*: \$50

application fee + \$22 CHRC = \$72 per applicant, multiplied by two applicants = **\$144** combined total, annually

Applicant who demonstrates *competency via C.E.* and *needs to accumulate all 24 hours* (assuming a rate of \$30 per credit): \$50 application fee + \$22 CHRC fee + \$720 C.E. course registration fees = \$792 per applicant, multiplied by two applicants = **\$1,584** combined total, annually

If fewer than two applicants apply for licensure by endorsement under 63 Pa.C.S. § 3111 in a given year, then obviously the above figures for combined total costs would be lower. At the lowest end, assuming at least one individual from a jurisdiction that requires NCARB certification applied for licensure by endorsement under 63 Pa.C.S. § 3111 each year, and that individual demonstrated competency by either experience or 24 previously-acquired continuing education credits, the total cost annual cost would be \$52, consisting of the \$30 application fee and \$22 CHRC fee. The highest end scenario (\$1,584) would be if two applicants from jurisdictions that do not require NCARB certification applied for licensure by endorsement under 63 Pa.C.S. § 3111, each of whom chose to demonstrate competency via continuing education and had not previously accumulated any of the required 24 credits.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

The regulation would not result in costs or savings to local governments.

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

The Board will incur increased operational costs to implement licensure by endorsement under 63 Pa.C.S. § 3111. The costs incurred by the Board should be recouped in the form of application fees paid by applicants.

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

There should be no legal, accounting or consulting procedures associated with this rulemaking. Like all other applicants under the Board, affected individuals will be required to submit an application for licensure accompanied by required documentation and payment of a fee.

(22a) Are forms required for implementation of the regulation?

Yes, applicants are required to submit an online application.

(22b) If forms are required for implementation of the regulation, **attach copies of the forms here**. If your agency uses electronic forms, provide links to each form or a detailed description of the information required to be reported. **Failure to attach forms, provide links, or provide a detailed description of the information to be reported will constitute a faulty delivery of the regulation.**

The Bureau uses an online platform for the submission of applications for licensure through PALS, which also encompasses applications for licensure by endorsement under 63 Pa.C.S. § 3111. Within the online platform, applicants are asked a series of questions. Applicants are asked if they are currently licensed in another jurisdiction and the type of license for which they are applying. Applicants currently licensed in another jurisdiction, which is defined in the proposed rulemaking as another state, territory or country, are directed to submit a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license, translated into English if needed. Applicants are required to indicate whether they have been disciplined by the jurisdiction in which they are licensed or any other jurisdiction. Applicants with disciplinary history must upload appropriate documentation related to the discipline. Applicants must also provide a recent Criminal History Records Check (CHRC). Based upon the above, applications are then forwarded to Board counsel, and to the Board, if necessary, to determine eligibility under 63 Pa.C.S. § 3111. The Bureau is working towards creating a more detailed electronic application process specific to 63 Pa.C.S. § 3111 applications, which will decrease the need for manual review of applications. The Board attaches a paper application which will be the basis for developing the electronic licensure by endorsement application. (See Attachment “A”.)

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY 24-25	FY +1 25-26	FY +2 26-27	FY +3 27-28	FY +4 28-29	FY +5 29-30
SAVINGS:						
Regulated Community	N/A	N/A	N/A	N/A	N/A	N/A
Local Government	N/A	N/A	N/A	N/A	N/A	N/A
State Government	N/A	N/A	N/A	N/A	N/A	N/A
Total Savings	N/A	N/A	N/A	N/A	N/A	N/A
COSTS:						
Regulated Community	\$52 - \$1,584	\$52 - \$1,584	\$52 - \$1,584	\$52 - \$1,584	\$52 - \$1,584	\$52 - \$1,584
Local Government	N/A	N/A	N/A	N/A	N/A	N/A
State Government	N/A	N/A	N/A	N/A	N/A	N/A
Total Costs	\$52 - \$1,584	\$52 - \$1,584	\$52 - \$1,584	\$52 - \$1,584	\$52 - \$1,584	\$52 - \$1,584
REVENUE LOSSES:						
Regulated Community	N/A	N/A	N/A	N/A	N/A	N/A
Local Government	N/A	N/A	N/A	N/A	N/A	N/A
State Government	N/A	N/A	N/A	N/A	N/A	N/A
Total Revenue Losses	N/A	N/A	N/A	N/A	N/A	N/A

(23a) Provide the past three-year expenditure history for programs affected by the regulation.

Program	FY –3 2022-2023	FY –2 2023-2024	FY –1 2024-2025	Current FY 2025-2026
State Architects Licensure Board	\$487,278	\$498,898	\$667,502	\$702,000

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

- (a) An identification and estimate of the number of small businesses subject to the regulation.
- (b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record.
- (c) A statement of probable effect on impacted small businesses.
- (d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.

Responses:

- (a) This rulemaking will not have an adverse impact on small businesses unless small businesses voluntarily pay application fees or other costs relating to establishing competency. Because these fees are incurred by individuals applying for licensure, any business (small or otherwise) could avoid these costs by requiring employees to pay their own licensure costs.
- (b) This rulemaking will not impose additional reporting, recordkeeping or other administrative costs on small businesses.
- (c) The probable effect on impacted small businesses would be positive because 63 Pa.C.S. § 3111 and the Board's regulations will encourage skilled workers and their families to move to Pennsylvania, which will enhance the workforce, provide more talent for businesses and help grow Pennsylvania's economy.
- (d) The Board could discern no less costly or less intrusive alternative methods to effectuate the purpose of 63 Pa.C.S. § 3111 that would be consistent with the Board's mandate to produce enough revenue to cover its costs of operations and to administer the act in the public interest.

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

No special provisions have been developed for any affected groups or persons.

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

Other than AIA-PA's suggestion that a passing score on the ARE be added to the available methods of establishing competency without regard to when the passing score was obtained, no alternative regulatory provisions were considered. The board chose the two methods identified in 63 Pa.C.S. § 3111 – experience or continuing education – as being acceptable measures of competency, and did not believe it was necessary or appropriate to add passage of the ARE because passage of the exam does not necessarily establish present-day competency, particularly if the passing score was obtained many years ago. Instead, the board factors in passage of the exam when it does its analysis of the other jurisdiction's licensure requirements, and specifically, when it determines whether the other jurisdiction requires passage of the ARE or a substantially equivalent exam. The board believes this proposal represents the least burdensome acceptable alternative.

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

- a) The establishment of less stringent compliance or reporting requirements for small businesses;
- b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses;
- c) The consolidation or simplification of compliance or reporting requirements for small businesses;
- d) The establishment of performing standards for small businesses to replace design or operational standards required in the regulation; and
- e) The exemption of small businesses from all or any part of the requirements contained in the regulation.

Responses:

- a) & b) The Board did not consider less stringent reporting requirements or deadlines for small businesses or for applicants that intend to work for small businesses. All applicants for licensure are treated equally.
- c) There are no compliance or reporting requirements that could be consolidated or simplified. The application process is the same whether a particular licensee is employed by a small business or a large business.
- d) The regulations do not contain design or operational standards that need to be altered for small businesses.
- e) To exclude any applicant from the requirements contained in the regulation based on the size of their employers would not be consistent with 63 Pa.C.S. § 3111.

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or

supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

No data, studies or references were used to justify the regulation.

(29) Include a schedule for review of the regulation including:

- | | |
|---|--|
| A. The length of the public comment period: | 30 days |
| B. The date or dates on which any public meetings or hearings will be held: | No public hearings were scheduled or held. The Board discusses its regulatory proposals at regularly scheduled public meetings. This rulemaking was discussed at public board meetings on: September 5, 2019; November 14, 2019; March 12, 2020; July 9, 2020; September 9, 2021; October 28, 2021; March 10, 2022; and July 14, 2022. |
| C. The expected date of delivery of the final-form regulation: | Winter 2025 |
| D. The expected effective date of the final-form regulation: | Upon publication as final. |
| E. The expected date by which compliance with the final-form regulation will be required: | Upon publication as final. |
| F. The expected date by which required permits, licenses or other approvals must be obtained: | N/A |

(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

The Board continually reviews the efficacy of its regulations, as part of its annual review process under Executive Order 1996-1. The Board reviews its regulatory proposals at regularly scheduled public meetings. The Board will meet on the following remaining date in 2025: November 7, 2025. In 2026, the Board is scheduled to meet on January 8, March 12, May 14, July 9, September 10 and November 12, 2026. More information can be found on the Board's website.

ATTACHMENT A

STATE ARCHITECTS LICENSURE BOARD

P.O. Box 2649
Harrisburg, PA 17105-2649

Telephone: 833-367-2762
Website: www.dos.pa.gov/arch
E-Mail: ST-ARCHITECT@pa.gov

Courier Address:
2525 N 7th Street
Harrisburg, PA 17110

APPLICATION FOR LICENSURE BY ENDORSEMENT UNDER 63 Pa.C.S. § 3111

PLEASE NOTE: If a pending application is older than one year from the date submitted and the applicant wishes to continue the application process, the State Architects Licensure Board (Board) shall require the applicant to submit a new application including the required fee.

In order to complete the application process, many of the supporting documents associated with the application cannot be more than six months from the date of issuance. All background check documents cannot be older than 90 days from the date of issuance.

1. REQUIREMENTS

Persons applying for licensure by endorsement under 63 Pa.C.S. § 3111 must:

- A. Hold a current license, certificate, registration or permit in good standing to practice architecture in a jurisdiction whose standards are substantially equivalent to or exceed those of the Board.
- B. Demonstrate competency by one the following:
 - Experience in the practice of architecture by demonstrating, at a minimum, that the applicant has actively engaged in the practice of architecture in the jurisdiction that issued the license, certificate, registration or permit for at least 2 of the last 5 years immediately preceding the filing of this application with the Board.
 - Completion of 24 continuing education hours related to the practice of architecture during the 24 months immediately preceding the date of the application.
- C. Have not committed any act that constitutes grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice architecture under the act (63 P.S. § 34.901) or 49 Pa. Code § 9.151 and has not been disciplined by the jurisdiction that issued the license, certificate, registration or permit or by any other jurisdiction.
- D. Pay the \$30 application fee (for those who hold a license in a jurisdiction that requires NCARB certification for licensure in that jurisdiction) or the \$50 application fee (for those who hold a license in a jurisdiction that does not require NCARB certification for licensure in that jurisdiction).
- E. Provide a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license. The copy of the applicable law, regulation or other rule must include the enactment date. If the applicable law, regulation or other rule is in a language other than English, at the applicant's expense, the applicable law, regulation or other rule shall be translated by a professional translation service and verified to be complete and accurate.

2. APPLICATION CHECKLIST

Persons licensed in other jurisdictions who possess a current license, registration, certificate or permit in good standing:

- ☐ Complete pages 1, 2 and 3 of the application.

If any documentation submitted in connection with this application will be received in a name other than the name under which you are applying, you must submit a copy of the legal document(s) indicating the name change (i.e., marriage certificate, divorce decree which indicates the retaking of your maiden name, legal document indicating the retaking of a maiden name, or court order).

- ☐ \$30 or \$50 Application Fee – Check or money order made payable to the Commonwealth of Pennsylvania.

Fees are not refundable or transferable. A processing fee of \$20.00 will be charged for any check or money order returned unpaid by your bank, regardless of the reason for non-payment.

- ☐ Have the out-of-state licensing authorities in which you hold or have held a license submit a letter of good standing directly to the Board with a state seal affixed to the letter.
- ☐ A Criminal Background Check from the state in which you reside must be submitted. The criminal background check must be completed within 90 days of submission of this application to the Board.

3. INFORMATION

- A. Any change in disciplinary status between the date of submission of the application and the date of passing the examination, if applicable, must be reported to the Board in writing.

STATE ARCHITECTS LICENSURE BOARD

Mailing Address:

P.O. Box 2649
Harrisburg, PA 17105-2649
Telephone: (833) 367-2762
Fax: (717) 705-5540

Courier Address:

2525 N 7th Street
Harrisburg, PA 17110
www.dos.pa.gov/arch
ST-ARCHITECT@pa.gov

APPLICATION FOR LICENSURE BY ENDORSEMENT UNDER 63 Pa.C.S. § 3111

INITIAL APPLICATION FEE: \$30 (FOR THOSE LICENSED IN A JURISDICTION THAT REQUIRES NCARB CERTIFICATION FOR LICENSURE IN THAT JURISDICTION) OR \$45 (FOR THOSE LICENSED IN A JURISDICTION THAT REQUIRES NCARB CERTIFICATION FOR LICENSURE IN THAT JURISDICTION) PAYABLE TO THE COMMONWEALTH OF PENNSYLVANIA. FEES ARE NOT REFUNDABLE OR TRANSFERABLE. A PROCESSING FEE OF \$20.00 WILL BE CHARGED FOR ANY CHECK OR MONEY ORDER RETURNED UNPAID BY YOUR BANK, REGARDLESS OF THE REASON FOR NON-PAYMENT.

1. Name _____ (Last) (First) (Middle)
2. Will any documentation submitted in connection with this application be received in a name other than the name under which you are applying? YES ☐ NO ☐ If yes, please provide the other name or names: _____
3. Address _____ (Street) _____ (City) (State) (Zip Code) <i>The address you provide is the address that will be associated with this application to which all correspondence will be mailed. Please note that licenses are not forwardable.</i>
4. Telephone _____ Fax _____
5. E-Mail Address _____
6. Date of Birth _____ Social Security Number: _____
7. Select the license for which you are applying: ☐ Registered Architect
8. Competency Requirement (one of the following):

Experience:

Have you actively engaged in the practice of architecture in the jurisdiction that issued your license, certificate, registration or permit, for at least 2 of the last 5 years immediately preceding the filing of this application?

☐ Yes

☐ No

Provide a curriculum vitae demonstrating this experience.

Continuing education:

Have you completed 24 hours of continuing education during the 24 months immediately preceding the date of this application?

☐ Yes

☐ No

If "yes," submit proof of completion of continuing education hours.

9. Name of state or jurisdiction where initial license to practice was issued.

Date initial license was issued _____

List any other state, territory or country where you hold or have held a license/certificate.

Have the licensing authority listed above submit a letter of good standing (verification of licensure) directly to the Board with state seal affixed to the letter. Provide a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license.

		YES	NO
10.	Do you hold, or have you ever held, a license, certificate, permit, registration or other authorization to practice any other profession in any state or jurisdiction? If you answered YES to the above question, please provide the profession and state or jurisdiction. Please do not abbreviate the profession. _____ _____ The Board must receive verification of any license, certificate, permit, registration or other authorization to practice any other profession directly from the state or jurisdiction. <i>PLEASE NOTE: The Board does NOT need to receive verification for licenses issued by one of the licensing boards within the Pennsylvania Bureau of Professional and Occupational Affairs.</i>	☐	☐
If you answer YES to any of the following questions, provide complete details as well as copies of relevant documents to the Board office.		YES	NO

11.	Have you had disciplinary action taken against a professional or occupational license, certificate, permit, registration or other authorization to practice a profession or occupation issued to you in any state or jurisdiction or have you agreed to voluntary surrender in lieu of discipline?	☐	☐
12.	Do you currently have any disciplinary charges pending against your professional or occupational license, certificate, permit or registration in any state or jurisdiction?	☐	☐
13.	Have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?	☐	☐
14.	Do you currently have any criminal charges pending and unresolved in any state or jurisdiction?	☐	☐

NOTICE: Disclosing your Social Security Number on this application is mandatory in order for the State Boards to comply with the requirements of the Federal Social Security Act pertaining to Child Support Enforcement, as implemented in the Commonwealth of Pennsylvania at 23 Pa.C.S. § 4304.1(a). At the request of the Department of Human Services (DHS), the licensing boards must provide to DHS information prescribed by DHS about the licensee, including the social security number. In addition, Social Security Numbers are required in order for the Board to comply with the reporting requirements of the U.S. Department of Health and Human Services, National Practitioner Data Bank.

Applicant's Statement:

I verify that this application is in the original format as supplied by the Department of State and has not been altered or otherwise modified in any way. I am aware of the criminal penalties for tampering with public records or information under 18 Pa.C.S. § 4911.

I verify that the statements in this application are true and correct to the best of my knowledge, information and belief. I understand that false statements are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities) and may result in the suspension, revocation or denial of my license, certificate, registration or permit.

Applicant's Signature

Date

**FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU**

(Pursuant to Commonwealth Documents Law)

RECEIVED

Independent Regulatory
Review Commission

November 24, 2025

DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to form and legality. Attorney General BY: <u></u> (DEPUTY ATTORNEY GENERAL) <u>November 10, 2025</u> DATE OF APPROVAL ☐ Check if applicable Copy not approved. Objections attached.	Copy below is here by certified to be a true and correct copy of a document issued, prescribed or promulgated by: <u>State Architects Licensure Board</u> (AGENCY) DOCUMENT/FISCAL NOTE NO. <u>16A-4120</u> DATE OF ADOPTION: _____ By: <u></u> Mary E. McClenaghan, RA TITLE <u>Board President</u> (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)	Copy below is hereby approved as to form and legality. Executive or Independent Agencies. Digitally signed by Cynthia K. Montgomery DN: cn=Cynthia K. Montgomery, o, ou, email=cymontgome@pa.gov, c=US Date: 2025.10.16 11:30:26 -04'00' BY: <u></u> Deputy General Counsel, Chief Counsel Independent Agency (Strike inapplicable title) <u>October 16, 2025</u> DATE OF APPROVAL ☐ Check if applicable. No Attorney General approval or objection within 30 days after submission.
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PROPOSED RULEMAKING

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE ARCHITECTS LICENSURE BOARD**

TITLE 49 PA CODE CHAPTER 9

§§ 9.2, 9.3, 9.61, 9.62, 9.65, 9.66, 9.93 and 9.211

LICENSURE BY ENDORSEMENT

The State Architects Licensure Board (Board) proposes to amend §§ 9.2, 9.3, 9.61, 9.62, 9.93 and 9.211, and add §§ 9.65 and 9.66 (relating to licensure by endorsement; and provisional endorsement license) to read as set forth in Annex A.

Effective Date

This proposed rulemaking will be effective upon publication of the final-form rulemaking in the *Pennsylvania Bulletin*.

Statutory Authority

Section 3111 of 63 Pa.C.S. (relating to licensure by endorsement) requires licensing boards and commissions to “issue a license, certificate, registration or permit to an applicant to allow practice in this Commonwealth” provided the applicant meets the following criteria: “[h]olds a current license, certificate, registration or permit from another state, territory or country” whose licensing “requirements are substantially equivalent to or exceed the requirements . . . in this Commonwealth”; “demonstrates competency”; “[h]as not committed any act that constitutes grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice that profession or occupation in this Commonwealth, unless the board or commission determines” such conduct is not an impediment to granting the license, certificate, registration or permit; “[i]s in good standing and has not been disciplined by the jurisdiction that issued the license, certificate, registration or permit, unless the . . . board or . . . commission determines” such conduct is not an impediment to granting the license, certificate, registration or permit, and the applicant pays fees, as established by regulation. Additionally, 63 Pa.C.S. § 3111 authorizes boards and commissions to “issue a provisional license, certificate, registration, or permit” while an applicant is satisfying remaining requirements for licensure by endorsement, for which the Board must set by regulation the terms of expiration.

Additionally, section 303(a)-(d) of the Architects Licensure Law (act) (63 P.S. § 34.303(a)-(d)) authorizes the Board to establish reasonable rules and regulations to carry out the provisions of the act, including standards of professional conduct for architects, the examination of applicants, and the issuance of licenses and certificates (including by reciprocity).

Section 506 of the Admin. Code (71 P.S. §186) empowers the heads of all administrative departments, the several independent administrative boards and commissions, and the several departmental administrative boards and commissions, to prescribe rules and regulations not inconsistent with law, for the government of their respective departments, boards, or commissions.

The act of July 1, 2020 (P.L. 575, No. 53) added 63 Pa.C.S. § 3111 as part of the consolidation of the act of July 2, 1993 (P.L. 345, No. 48) (Act 48, now repealed) into 63 Pa.C.S. Chapter 31 (relating to powers and duties). The text of 63 Pa.C.S. § 3111 was originally added to Act 48 by the act of July 1, 2019 (P.L. 292, No. 41) (Act 41).

Background and Need for the Amendments

This proposed rulemaking is needed to effectuate 63 Pa.C.S. § 3111, which requires the Board to issue a license, certificate, registration or permit to an applicant who is licensed in good standing in another jurisdiction and meets the requirements for licensure by endorsement as set forth in 63 Pa.C.S. § 3111. Under 63 Pa.C.S. § 3111(a)(1), the Board must determine whether the other jurisdiction's standards for licensure are substantially equivalent to or exceed those established by the Board. Additionally, 63 Pa.C.S. § 3111(a)(2) requires the Board to determine the methods of competency, including experience in the profession or occupation for at least 2 of the 5 years immediately preceding the filing of the application, or completion of continuing education. Under 63 Pa.C.S. § 3111(b)(2), the Board must also establish, by regulation, the expiration of provisional endorsement licenses.

This proposed rulemaking sets forth the Board’s criteria for eligibility for licensure by endorsement, including the specific methods required for an applicant to demonstrate competency. It also sets forth the requirements for granting a provisional endorsement license. Section 3111 of 63 Pa.C.S. further provides that the Board may establish appropriate fees for this licensure.

In accordance with the requirements of Executive Order 1996-1 (4 Pa. Code §§ 1.371—1.382), the Board sent an exposure draft of this proposed rulemaking to stakeholders and other interested parties. One comment was received from the American Institute of Architects, Pennsylvania (AIA-PA), who expressed concerns that Act 41 might create a path to licensure for applicants from other states, territories or countries that is easier (that is, less stringent) than the Board’s current requirements for the more traditional, existing pathways to licensure (by examination and by reciprocity). While the Board understands AIA-PA’s concerns, the Board is bound to abide by the statutory mandates of 63 Pa.C.S. § 3111, including first and foremost that applicants must be in good standing to practice in jurisdictions whose licensing requirements are substantially equivalent to or exceed the requirements of the Board. Second, to be granted a license, applicants must also demonstrate competency by methods determined by the Board. Applicants must also not have committed any act or received any discipline that would warrant refusal, suspension or revocation of a license.

With regard to competency methods, AIA-PA suggested that the Board should add a third option – in addition to experience or education – for applicants to establish competency, namely, a passing score on the Architect Registration Examination without regard to when the passing score was obtained. The board chose the two methods identified in 63 Pa.C.S. § 3111 – experience or continuing education – as being acceptable measures of competency, and did not believe it was necessary or appropriate to add passage of the ARE because passage of the exam alone does not

necessarily establish present-day competency. For example, an architect may have passed the examination many years ago and then done nothing thereafter as far as actively practicing or keeping current with the profession by taking continuing education. Instead, the board factors in passage of the ARE as a component of the “substantially equivalent” analysis. The Board will determine whether the jurisdiction in which the applicant is licensed requires passage of the ARE or an examination that is substantially equivalent to the ARE. With regard to the documentation needed to support an applicant who chose to demonstrate competency via continuing education, AIA-PA inquired as to whether an AIA-PA Continuing Education Transcript would be acceptable proof of having obtained the necessary 24 hours. The Board anticipates that such documentation would be acceptable, but did not feel it necessary to actually write language into the regulation specifying the AIA-PA CE Transcript.

AIA-PA also raised concerns about architects acting as the “architect of record” and using a seal while practicing under a provisional license. So long as the provisional license holder was following all applicable laws and regulations at the time a document was signed or sealed, any subsequent assessment of that document’s validity should be unaffected by whether or not the provisional license ultimately became a full license.

Description of the Proposed Amendments

The Board proposes to amend § 9.2 (relating to definitions) by adding a definition for the term “jurisdiction” consistent with 63 P.S. § 3111. For purposes of consistency, corresponding amendments are proposed to §§ 9.61, 9.62, 9.93 and 9.211, replacing the words “state,” “territory” and “country” (and combinations thereof) with the term “jurisdiction.”

Proposed § 9.65 (relating to licensure by endorsement) requires an applicant to satisfy six criteria for licensure by endorsement. Under subsection (a)(1), an applicant shall have a current

license, certificate, registration or permit in good standing to practice in another jurisdiction whose standards are substantially equivalent to or exceed those established by the Board under section 501 of the act (63 P.S. § 34.501), and §§ 9.41 and 9.46 (relating to general requirements; and requirements for examination eligibility). Proposed subsection 9.65(a)(1) further requires an applicant to submit a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license, certificate, registration or permit. This proposed rulemaking would also require that the copy of the applicable law, regulation or other rule include the enactment date. Additionally, because 63 Pa.C.S. § 3111 is applicable to territories and other countries where the applicable law, regulation or other rule may be in a language other than English, the Board would require translation of the applicable law, regulation or other rule by a professional translation service, at the applicant's expense.

Proposed subsection (a)(2) requires demonstration of competency. Under this provision, an applicant shall provide proof of competency by demonstrating either experience in the practice of the profession or completion of continuing education. To demonstrate competency by experience, an applicant must show active engagement in the practice of the profession under a license, certificate, registration or permit in one or more jurisdictions that have substantially equivalent standards for at least 2 of the 5 years immediately preceding the filing of the application. To demonstrate competency through continuing education, an applicant must submit proof of completion of 24 hours of continuing education. The continuing education must have been completed during the 24 months immediately preceding the filing of the application. The Board proposes 24 months because a 24-month limitation correlates with the Board's biennial renewal continuing education requirement.

Proposed subsection (a)(3) incorporates the statutory prohibition in 63 Pa.C.S. § 3111 pertaining to conduct that would constitute grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice the profession or occupation. Similarly, proposed subsection (a)(4) incorporates the statutory prohibition pertaining to prior discipline by the jurisdiction that issued the license, certificate, registration or permit.

Proposed subsection (a)(5) provides for payment of an application fee, as required by 63 Pa.C.S. § 3111(a)(5). As reflected in the proposed amendments to § 9.3 (relating to fees), no new fees are being proposed. Instead, for applicants licensed in a jurisdiction that requires NCARB certification, the applicable fee for licensure by endorsement under 63 Pa.C.S. § 3111 will be \$30, the same as the existing “reciprocal license with NCARB certification” fee in § 9.3. For applicants who are licensed in a jurisdiction that does not require NCARB certification, the applicable fee for licensure by endorsement under 63 Pa.C.S. § 3111 will be \$50, the same as the existing “reciprocal license without NCARB certification” fee. In instances of the latter, additional review is undertaken to determine whether the other jurisdiction’s laws and regulations require something substantially equivalent to NCARB certification.

Proposed subsection (a)(6) requires applicants to apply for licensure in accordance with the act and in the manner and format prescribed by the Board.

In proposed § 9.65(b), the Board may require a personal interview or additional information to assist the Board in determining eligibility and competency. When a personal interview is necessary, the applicant may request that the interview be conducted by video teleconference for good cause shown.

Consistent with 63 Pa.C.S. § 3111(a)(3) and (4), proposed § 9.65(c) authorizes the Board, in its discretion, to determine that an act prohibited under section 901 of the act (63 P.S. §§ 34.901)

or § 9.151 (relating to standards of professional conduct), or disciplinary action by another jurisdiction, are not impediments to the granting of a license, certificate, registration or permit by endorsement under 63 Pa.C.S. § 3111. The Board routinely considers whether discipline or prohibited acts are impediments to licensure. The Board may consider the facts and circumstances surrounding the prohibited act or disciplinary action, an increase in age or maturity of the individual since the date of the prohibited act or disciplinary action, disciplinary history (or lack thereof) before and after the date of the prohibited act or disciplinary action, successful completion of education and training activities relating to the prohibited act or disciplinary action, and any other information relating to the fitness of the individual for licensure.

Consistent with section 63 Pa.C.S. § 3111(b), proposed § 9.66(a) provides that the Board may, in its discretion, issue a provisional endorsement license while an applicant is satisfying remaining requirements under 63 Pa.C.S. § 3111 and proposed § 9.65. Proposed subsection (b)(1) sets the expiration of a provisional endorsement license at 1 year, unless the Board determines that an expiration date of less than 1 year is appropriate. Additionally, under subsection (b)(2), upon a written request, the Board may extend the term of the provisional license for no longer than 1 year upon a showing of good cause. Proposed subsection (c) sets forth reasons for which a provisional endorsement license will be terminated, including when the Board denies or grants a license, the provisional endorsement licensee fails to comply with the terms of the provisional endorsement license or the provisional endorsement license expires. Proposed subsection (d) clarifies that while an individual may reapply for a license by endorsement under proposed § 9.65, the Board will not issue a subsequent provisional endorsement license to an applicant who previously held a provisional endorsement license that expired or was terminated.

Proposed § 9.66(e) provides that holders of provisional endorsement licenses shall follow

the rules governing the proper use of a registrant’s seal as set forth under section 505 of the act (63 P.S. § 34.505) (relating to seal of architect) and §§ 9.141–9.146.

Fiscal Impact and Paperwork Requirements

This proposed rulemaking will have no adverse fiscal impact on the Commonwealth or its political subdivisions. The costs to the Board related to processing applications for licensure by endorsement will be recouped through fees paid by applicants. Under § 9.3 (relating to fees), applicants for licensure by endorsement from jurisdictions that require NCARB certification will pay the same application fee, \$30, as reciprocal applicants holding NCARB certification. Similarly, applicants for licensure by endorsement from jurisdictions that do not require NCARB certification will pay the same application fee, \$50, as reciprocal applicants who do not hold NCARB certification. Applicants who apply for licensure by endorsement may incur continuing education expenses if they choose to demonstrate competency by completing 24 hours of continuing education.

Sunset Date

The Board continuously monitors the cost effectiveness of the Board’s regulations. Therefore, no sunset date has been assigned.

Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), on November 24, 2025, the Board submitted a copy of this proposed rulemaking and a copy of a Regulatory Analysis Form to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the Senate Consumer Protection and Professional Licensure Committee (SCP/PLC) and the House Professional Licensure Committee (HPLC). A copy of this material is available to the public upon request.

Under section 5(g) of the Regulatory Review Act, IRRC may convey comments, recommendations or objections to the proposed rulemaking within 30 days of the close of the public comment period. The comments, recommendations or objections shall specify the regulatory review criteria in section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b) which have not been met. The Regulatory Review Act specifies detailed procedures for review, prior to final publication of the rulemaking, by the Board, the General Assembly and the Governor.

Public Comment

Interested persons are invited to submit written comments, recommendations or objections regarding this proposed rulemaking to Regulatory Counsel, State Architects Licensure Board, P.O. Box 69523, Harrisburg, PA 17106-9523, or by e-mail to RA-STRegulatoryCounsel@pa.gov within 30 days of publication of this proposed rulemaking in the *Pennsylvania Bulletin*. Please reference “16A-4120 (Licensure by Endorsement)” when submitting comments.

Mary E. McClenaghan, RA
President
State Architects Licensure Board

Annex A

TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS

PART I. DEPARTMENT OF STATE

Subpart A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS

CHAPTER 9. STATE ARCHITECTS LICENSURE BOARD

GENERAL PROVISIONS

§ 9.2. Definitions.

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

* * * * *

IDP council record—A detailed authenticated record of an individual's education, training and character maintained by NCARB.

Jurisdiction—a state, territory or country.

NAAB—National Architectural Accrediting Boards, Inc.

* * * * *

§ 9.3. Fees.

Initial license \$ 40

Reciprocal license with NCARB Certification
or Licensure by Endorsement (Applicant licensed in another jurisdiction that requires NCARB Certification) \$30

Reciprocal license without NCARB Certification
or Licensure by Endorsement (Applicant licensed in another jurisdiction that does not require NCARB Certification) \$50

Certification of licensure, registration or scores \$ 25

* * * * *

LICENSURE BY RECIPROCITY AND LICENSURE BY ENDORSEMENT**§ 9.61. General requirements.**

Licensure may be granted to an applicant who holds a license to practice architecture in another [state, territory or country] **jurisdiction** where the qualifications required for licensure are equal to the requirements for licensure in this Commonwealth at the time of licensure in the original jurisdiction and the applicant is of good moral character. Possession of an NCARB Certificate is prima facie evidence that the individual meets the requirements of the Commonwealth.

§ 9.62. Reciprocal licensure.

(a) An applicant for reciprocal licensure shall submit a completed application on forms provided by the Board containing:

(1) A letter of good standing, or the equivalent from the licensing entity of the [state or country] **jurisdiction** where the architect currently practices.

(2) Information relative to training, education and experience as an employe or as a practicing principal.

(b) An applicant who has qualified for original licensure by having passed the ARE in or after 1992 shall submit certification of having met the training requirements for IDP.

* * * * *

(Editor's Note: The following section is proposed to be added and is printed in regular type to enhance readability.)

§ 9.65. Licensure by endorsement.

(a) *Requirements for issuance.* To be issued a license by endorsement under 63 Pa.C.S. § 3111 (relating to licensure by endorsement), an applicant shall satisfy all of the following conditions:

(1) Have a current license, certificate, registration or permit in good standing to practice as a professional architect in another jurisdiction whose licensure standards are substantially equivalent to or exceed those established under section 501 of the act (63 P.S. § 34.501), and §§ 9.41 and 9.46 (relating to general requirements; and requirements for examination eligibility). The following apply:

(i) An applicant shall submit a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license, certificate, registration or permit.

(ii) If the applicable law, regulation or other rule is in a language other than English, at the applicant's expense, the applicable law, regulation or other rule shall be translated by a professional translation service and verified to be complete and accurate.

(iii) The copy of the applicable law, regulation or other rule must include the enactment date.

(2) Demonstrate competency by one of the following:

(i) Experience in the practice of professional architecture by demonstrating, at a minimum, that the applicant has actively engaged in the practice of professional architecture under a license, certificate, registration or permit in a jurisdiction or jurisdictions that have substantially equivalent licensure standards, for at least 2 of the 5 years immediately preceding the filing of the application with the Board.

(ii) Completion of 24 continuing education hours related to the practice of professional architecture during the 24 months immediately preceding the filing of the application with the Board.

(3) Have not committed any act that constitutes grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice professional architecture under section 901 of the act (63 P.S. § 34.901) or § 9.151 (relating to standards of professional conduct).

(4) Have not been disciplined by the jurisdiction that issued the license, certificate, registration or permit.

(5) Have paid the applicable fee for licensure by endorsement as required by § 9.3 (relating to fees).

(6) Have applied for licensure in accordance with this chapter in the manner and format prescribed by the Board.

(b) *Interview and additional information.* An applicant may be required to appear before the Board for a personal interview and may be required to submit additional information, including supporting documentation relating to competency and experience. The applicant may request the interview to be conducted by video teleconference for good cause shown.

(c) *Prohibited acts and discipline.* Notwithstanding subsection (a)(3) and (4), the Board may, in its discretion, determine that an act prohibited under section 901 of the act or § 9.151, or disciplinary action by another jurisdiction, is not an impediment to licensure under 63 Pa.C.S. § 3111.

(Editor's Note: The following section is proposed to be added and is printed in regular type to enhance readability.)

§ 9.66. Provisional endorsement license.

(a) *Provisional endorsement license.* The Board may, in its discretion, issue a provisional endorsement license to an applicant while the applicant is satisfying remaining requirements for

licensure by endorsement under 63 Pa.C.S. § 3111 (relating to licensure by endorsement) and § 9.65 (relating to licensure by endorsement).

(b) *Expiration of a provisional endorsement license.*

(1) An individual holding a provisional endorsement license may practice for up to 1 year after issuance of the provisional endorsement license. The Board, in its discretion, may determine that an expiration date of less than 1 year is appropriate.

(2) Upon a written request and a showing of good cause, the Board may grant an extension of no longer than 1 year from the expiration date of the provisional endorsement license.

(c) *Termination of a provisional endorsement license.* A provisional endorsement license terminates if any of the following occurs:

(1) The Board completes its assessment of the applicant and denies or grants the license.

(2) The holder of the provisional license fails to comply with the terms of the provisional endorsement license.

(3) The provisional endorsement license expires.

(d) *Reapplication.* An individual may reapply for licensure by endorsement under § 9.65 after expiration or termination of a provisional endorsement license; however, the individual may not be issued a subsequent provisional endorsement license.

(e) *Use of seal.* An individual issued a provisional endorsement license shall follow the rules governing the proper use of a licensee's seal under section 505 of the act (63 P.S. § 34.505) (relating to seal of architect) and §§ 9.141–9.146.

APPLICATION PROCEDURES

§ 9.93. Reporting of disciplinary actions, criminal convictions and other licenses.

(a) An applicant for a license issued by the Board shall apprise the Board of the following:

(1) A license, certificate, registration or other authorization to practice a profession issued, denied or limited by another [state, territory or possession of the United States,] jurisdiction or by a branch of the Federal government [or another country].

(2) Disciplinary action instituted against the applicant by a licensing authority of another [state, territory or possession of the United States,] jurisdiction or by a branch of the Federal government [or another country].

(3) A finding or verdict of guilt, an admission of guilt or a plea of nolo contendere with respect to a felony offense or an offense involving moral turpitude.

(b) After the Board has issued a license, the licensee shall report any disciplinary action or criminal convictions, or both, to the Board in writing within 90 days after its occurrence or on the biennial renewal application, whichever occurs first.

ROSTER OF ARCHITECTS

§ 9.211. Identification of classes of licensure.

Classes of licensure as an architect in this Commonwealth shall be limited to Classes X and B.

(1) *Class X.* Licensure by examination.

(2) *Class B.* Licensure by reciprocity may be granted to a practicing architect who holds a current license, in good standing, in [any other state or country] another jurisdiction whose requirements for obtaining licensure are equal to those required under the act.



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE ARCHITECTS LICENSURE BOARD**

**Post Office Box 2649
Harrisburg, PA 17105-2649
1-833-367-2762**

November 24, 2025

The Honorable George D. Bedwick, Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harristown 2, 333 Market Street
Harrisburg, PA 17101

Re: Proposed Rulemaking
State Architects Licensure Board
16A-4120: Licensure by Endorsement

Dear Chairman Bedwick:

Enclosed is a copy of a proposed rulemaking package of the State Architects Licensure Board pertaining to Licensure by Endorsement.

The Board will be pleased to provide whatever information the Commission may require during the course of its review of the rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary E. McClenaghan".

Mary E. McClenaghan, RA, President
State Architects Licensure Board

MEM/MJF/dps
Enclosure

cc: Arion Claggett, Acting Commissioner of Professional and Occupational Affairs
K. Kalonji Johnson, Deputy Secretary for Regulatory Programs
Robert Beecher, Policy Director, Department of State
Andrew LaFratte, Deputy Policy Director, Department of State
Jason C. Giurintano, Deputy Chief Counsel, Department of State
Jacqueline A. Wolfgang, Senior Regulatory Counsel, Department of State
Ashley B. Goshert, Counsel, State Architects Licensure Board
State Architects Licensure Board

Worthington, Amber

Independent Regulatory
Review Commission

From: Smeltz, Jennifer <jmsmeltz@pasen.gov>
Sent: Monday, November 24, 2025 1:16 PM
To: Worthington, Amber
Subject: Re: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

Follow Up Flag: Follow up
Flag Status: Flagged

Received.

Jen

On Nov 24, 2025, at 12:08 PM, Worthington, Amber <agontz@pa.gov> wrote:

Ⓢ CAUTION : External Email Ⓢ

Please be advised that the following five (5) boards and commission are **electronically delivering** the below-identified proposed rulemakings today **Monday, November 24, 2025**.

1. **16A-5517 Licensure by Endorsement – State Board of Accountancy**
2. **16A-4120 Licensure by Endorsement – State Architects Licensure Board**
3. **16A-4334 Licensure by Endorsement – State Board of Chiropractic**
4. **16A-5432 Licensure by Endorsement – State Board of Pharmacy**
5. **16A-5625 Licensure by Endorsement – State Real Estate Commission**

These proposed rulemakings each effectuate 63 Pa.C.S. § 3111 (relating to licensure by endorsement) for applicants licensed in other jurisdictions where the licensure requirements are substantially equivalent to or exceed those established by the identified board or commission. Each board/commission is required to determine methods of demonstrating competency, including completion of continuing education or experience in the profession/ occupation for at least 2 of the preceding 5 years, and must establish, by regulation, the expiration of provisional endorsement licenses. These proposed rulemakings set forth eligibility criteria for licensure by endorsement, the specific methods required to demonstrate competency, and the requirements for provisional endorsement licenses.

The identified state boards/commissions are requesting a written (email) confirmation of receipt of this delivery from the designated contact person(s) from your office for the Majority or Minority Chair of your office effectuating the electronic deliveries.

Thank you for your attention to this matter.

<image002.png>

Amber A. Worthington, PLS | Legal Office Administrator 2
Office of Chief Counsel | Department of State
Governor's Office of General Counsel
P.O. Box 69523 | Harrisburg, PA 17106-9523
Office Phone 717.783.7200 | Fax: 717.787.0251
agontz@pa.gov | www.dos.pa.gov

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Independent Regulatory
Review Commission

November 24, 2025

Preferred Pronouns: We/Us, They/Them/Theirs

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<16A-5517 Stefano.pdf>
<16A-4120 Licensure by Endorsement Stefano.pdf>
<16A-4334 Proposed Stefano.pdf>
<16A-5432 Proposed Stefano.pdf>
<16A-5625 Stefano.pdf>

Worthington, Amber

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Review Commission

From: Bulletin <bulletin@palrb.us>
Sent: Monday, November 24, 2025 1:09 PM
To: Worthington, Amber; Adeline E. Gaydosh
Cc: Roland, Joel; Wolfgang, Jacqueline; Alyssa M. Burns
Subject: [External] RE: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

Follow Up Flag: Follow up
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Good afternoon,

Thank you for submitting these five proposed rulemakings. They will be published in the December 20, 2025, issue of the *Pennsylvania Bulletin*.

Have a great day!

Alyssa Burns | Legal Assistant
aburns@palrb.us | 717.783.1531
Legislative Reference Bureau
Pennsylvania Code & Bulletin Office
647 Main Capitol Building
Harrisburg, PA 17120

From: Worthington, Amber <agontz@pa.gov>
Sent: Monday, November 24, 2025 12:08 PM
To: Bulletin <bulletin@palrb.us>; Adeline E. Gaydosh <agaydosh@palrb.us>; Leah Brown <lbrown@palrb.us>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

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Thank you for your attention to this matter.



Amber A. Worthington, PLS | Legal Office Administrator 2
Office of Chief Counsel | Department of State
Governor's Office of General Counsel
P.O. Box 69523 | Harrisburg, PA 17106-9523

Office Phone 717.783.7200 | Fax: 717.787.0251

agontz@pa.gov | www.dos.pa.gov

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November 24, 2025

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Worthington, Amber

Independent Regulatory
Review Commission

From: Orchard, Kari L. <KOrchard@pahouse.net>
Sent: Monday, November 24, 2025 12:31 PM
To: Worthington, Amber; Barton, Jamie; Brett, Joseph D.
Cc: Roland, Joel
Subject: RE: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

Follow Up Flag: Follow up
Flag Status: Flagged

Regulations received. Thank you!

Kari Orchard

Executive Director (D) | House Professional Licensure Committee
Chairman Frank Burns, 72nd Legislative District

From: Worthington, Amber <agontz@pa.gov>
Sent: Monday, November 24, 2025 12:05 PM
To: Orchard, Kari L. <KOrchard@pahouse.net>; Barton, Jamie <JBarton@pahouse.net>; Brett, Joseph D. <JBrett@pahouse.net>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

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Thank you for your attention to this matter.

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Amber A. Worthington, PLS | Legal Office Administrator 2
Office of Chief Counsel | Department of State
Governor's Office of General Counsel

P.O. Box 69523 | Harrisburg, PA 17106-9523
Office Phone 717.783.7200 | Fax: 717.787.0251
agontz@pa.gov | www.dos.pa.gov

Independent Regulatory
Review Commission

November 24, 2025

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Worthington, Amber

From: Emily Hackman <Ehackman@pahousegop.com>
Sent: Monday, November 24, 2025 12:21 PM
To: Worthington, Amber
Cc: Roland, Joel; Cindy Sauder
Subject: RE: [EXTERNAL]: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

Follow Up Flag: Follow up
Flag Status: Flagged

Received. Thank you!

Emily Epler Hackman | Senior Policy Analyst

Pennsylvania House of Representatives

Health Committee (R)

141 Ryan Office Building

Phone: (717) 260-6351

From: Worthington, Amber <agontz@pa.gov>
Sent: Monday, November 24, 2025 12:06 PM
To: Nicole Sidle <Nsidle@pahousegop.com>; Cindy Sauder <Csauder@pahousegop.com>; Emily Hackman <Ehackman@pahousegop.com>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: [EXTERNAL]: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

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Thank you for your attention to this matter.

Independent Regulatory
Review Commission

November 24, 2025



Amber A. Worthington, PLS | Legal Office Administrator 2
Office of Chief Counsel | Department of State
Governor's Office of General Counsel

P.O. Box 69523 | Harrisburg, PA 17106-9523
Office Phone 717.783.7200 | Fax: 717.787.0251
agontz@pa.gov | www.dos.pa.gov

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Worthington, AmberIndependent Regulatory
Review Commission

From: Monoski, Jesse <jesse.monoski@pasenate.com>
Sent: Monday, November 24, 2025 12:05 PM
To: Worthington, Amber; Dimm, Ian; Kelly, Joseph; Vazquez, Enid
Cc: Roland, Joel
Subject: RE: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

Follow Up Flag: Follow up
Flag Status: Flagged

Received.

Jesse A. Monoski

Executive Director
Senate Consumer Protection & Professional Licensure Committee
Senator Lisa M. Boscola, Minority Chair
Room 458 Main Capitol Bldg., Harrisburg, Pa. 17120
Office: 717-787-4236 | Direct: 717-787-3506
www.senatorboscola.com

From: Worthington, Amber <agontz@pa.gov>
Sent: Monday, November 24, 2025 12:02 PM
To: Monoski, Jesse <jesse.monoski@pasenate.com>; Dimm, Ian <ian.dimm@pasenate.com>; Kelly, Joseph <joseph.kelly@pasenate.com>; Vazquez, Enid <enid.vazquez@pasenate.com>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

EXTERNAL EMAIL

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Amber A. Worthington, PLS | Legal Office Administrator 2
Office of Chief Counsel | Department of State
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RECEIVED

Independent Regulatory
Review Commission

November 24, 2025

Preferred Pronouns: We/Us, They/Them/Theirs

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