



To: Chairman Olson and Members of the Commerce Committee
From: American Institute of Architects Kansas Chapter, Dana Williamson, AIA, NCARB
Re: Opposition to SB 137
Date: February 23, 2021

My name is Dana Williamson; I am a licensed architect in Kansas and am here today representing the American Institute of Architects, Kansas Chapter, a professional organization representing over 740 architects across the state. I own the only architecture firm in Dodge City, Williamson Architecture. It has been my lifelong dream to be an architect, and I'm very thankful to have been able to choose between two prestigious schools of architecture here in the state, with both K-State and KU being nationally ranked. I was born and raised in Kansas and have chosen to raise my family and run my business here. I want other Kansans to do the same, and I also want to see the many out-of-state students who come to Kansas for our outstanding architecture education stay here as well.

We take for granted that we're safe and a building won't fall down around us or poison us when we walk into it. We don't avoid some buildings just because we don't know who designed them. We rely on the State and licensing boards to protect citizens by setting standards that can reasonably ensure a practitioner's competency. We don't think twice about requiring high standards for medical licenses because a doctor quite literally has the public's health in their hands. In the same way, architects are responsible for countless lives whenever they step into a public building. This is not a responsibility to be taken lightly. I know I don't.

I've recently researched the reciprocal requirements for the State of Missouri and, even though I'm licensed to practice in the state of Kansas, I'm still required to pass a state exam on Rules & Ethics to ensure I understand what the State of Missouri expects of me and my practice. I think this is completely reasonable and actually makes me feel better knowing that, if someone is allowed to practice architecture in the state of Missouri, they have a certain level of competency that should not be a danger to the health and safety of the public.

My education required me to be informed of the process to become a licensed architect in Kansas and that each state has its own process. However, as a member of the National Council of Architectural Registration Board (NCARB), the reciprocity process to become licensed in other states is fairly streamlined. NCARB members have already shown that they meet generally accepted competency standards of education, experience, and examinations. As such, architects licensed to practice in other states are only required to



submit their NCARB record to the State of Kansas Board of Technical Professions in order to receive their Kansas license, in a relatively easy process.

Additionally, if we allow sub-par or questionably competent practitioners from other states an easy pass to practice - and compete - in Kansas, what is the incentive for students to come and professionals educated in Kansas to stay?

I am a business owner juggling my commitment to my family and my passion for helping people through practicing architecture, and I know the difficulty of the licensure process firsthand. I took steps to complete some of my required experience hours while still in school, which allowed me to acquire the full amount of experience hours within two years instead of the typical three years. I also gave birth to my first child in the midst of those two years, during which I was also taking the seven required exams. It's a rigorous process and for good reason. I believe it is not unreasonable to ask individuals seeking to practice architecture in the state of Kansas to be held to that same standard of rigor; in fact, I believe it is dangerous NOT to require the same standard, especially when the safety of the public is concerned.

I believe that architects (just like other practitioners who are responsible for the health, and safety of the public such as doctors, engineers, etc.) should be held to higher competency standards than those applicable in SB 137 as written.

SB 137 lowers the assessment standard for out-of-state applicants from “substantially equivalent” to “similar scope of practice,” which does not allow the licensing Board to assess the applicants’ competence. While it lowers the standard for out-of-state applicants, it keeps the current, higher standards in place for Kansas residents seeking licensure. Moreover, this bill eliminates the licensing board’s discretion to deny temporary licenses to out-of-state applicants who do not meet Kansas statutory minimum qualifications.

SB 137, like Sub for HB 2066, goes further than the other licensure deregulation proposals under consideration. To our knowledge, only four other states have passed broad-brush delicensing proposals. None of these laws use a “similar scope of practice” standard to assess an applicant’s qualifications. All of these bills provide licensing boards more discretion to assess an applicant’s competence than in SB 137. This bill is an outlier and goes beyond other proposals under consideration.

Our opposition to SB 137 can be remedied by including the Kansas State Board of Technical Professions in the provision outlined in Section 1, subsection (s) on page 7, which allows



the Board of Healing Arts to “deny any application for licensure, registration or certification, or decline to grant a temporary or probationary license if the board determines the applicant’s qualifications are not substantially equivalent to those established by the board.” This policy provision is critical to protect the public from potentially unqualified practitioners in Kansas and should be extended to the Board of Technical Professions.

In closing, we respectfully request that you amend SB 137 to add the Kansas State Board of Technical Professions with the Board of Healing Arts to the provisions in Section 1, subsection (s) on page 7, line 34-39 which allows the Board of Healing Arts and would allow the Board of Technical Professions to deny a license to an applicant whose qualifications are not substantially equivalent to those established by the board and in subsection (t) (20) on page 8, line 23 to add: “as provided by subsection (s)”.

Please adopt this amendment to protect the public and ensure a level playing field for both Kansans and out-of-state applicants seeking licensure in the state. Thank you.

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