

2 June, 2000

The Productivity Commission 2000
Architects Inquiry
LB2 Collins St.
East Melbourne, VIC 8003

Joseph D'Ambrosia
QLD

Subject: Response to the Review of Legislation Regulating the Architectural Profession

Dear Sir

1. To briefly introduce myself, I am a Registered Architect residing on the Gold Coast, working under the employment of Desmond Brooks International Architects for the past five years. I am 39 years old. I retain dual citizenship in both Australia and the United States. I have been working continuously in the architectural profession for the past 13.5 years here in Australia. Please refer to my comments regarding overseas-trained architects, in the following section 3.

2.0 Review of the Productivity Commission Report:

Recently, I have been issued the Draft Review highlighting nine 'key messages'. My response to the Productivity Commission proposal is as follows:

- 2.1 "Currently each State and Territory restricts the use of the title architect to persons who meet certain requirement (a certification system). Anyone, however may compete with architects; practice is not restricted. The Commission has assessed whether this regulation serves the public interest... "

Response: The title 'Architect' is the first safeguard serving the public interest in that only those that are allowed to use it have demonstrated they have met the necessary education and training standards and have passed the professional practice examination. If anyone could use this term, it would only benefit unqualified draftsmen and pose a potentially dangerous disservice to a misguided public.

- 2.2 "Building and planning codes and fair trading laws directly attempt to address community standards relating to building safety, propriety of building service providers and the quality of the built environment ..."

Response: There is an old university expression that states that good architecture, good design is greater than the sum of the parts. The BCA and local town plans don't produce good buildings or good services to the public. Certification helps to ensure

that architects are better informed and better qualified to see the overall picture beyond just building codes and regulations.

- 2.3 “But certification appears to do very little to promote additional community benefits. A majority of consumers chooses not to hire architects and certification of architects is a very indirect and imprecise way of ensuring that various standards are met. While most architects may have acquired relevant skills and competencies, certification does not appear directly to ensure such expertise.”

Response:

1. How else does one ensure standards are met without certification?
2. I agree that there is always room for improvement. Removing the certification of architects is obviously not the answer, but rather an obvious step in the wrong direction.
3. Consumers, by not choosing to hire architects, are exercising their right to choose, and unfortunately, it often leads to very poor results. Building work is an investment and good architectural design is a critical part of this investment. Using inexperienced, unskilled building designers will ensure potential risk to any project. If everyone is referred to an architect, it will only encourage this.
4. I agree that the AACA registration examination should be improved. Please refer section 3 below.
5. It is naïve to think that certification will automatically ensure a flawless product or service. An analogy would be that not every professional musician is or can be a virtuoso! Certification is just a tool, a means to an end.

- 2.4 “Perhaps the strongest argument for continued certification is... for accreditation of Australian exports of architectural and education services...”

Response: If overseas clients demand proof of an Australian architect’s accreditation in this country, why shouldn’t Australians be entitled to these very same assurances?

- 2.5 “Certification also restricts competition to some degree, imposing costs on consumers, architects and non architects...”

Response: The author of this statement has no idea how the industry operates. There is fierce competition in the industry with architect fees challenged and undercut by low service draftsmen, unqualified building designers and even other architects competitively bidding for the same job. The annual Architects Role fee is a negligible sum and besides, it is tax deductible.

- 2.6 “...the costs of current regulation outweigh the benefits because Architects Acts provide virtually no consumer and community benefits over and above outcomes

which could be delivered by the profession itself and other existing legislation ...the onus is on those arguing for retention of regulation to show benefits outweigh costs.”

Response: Regarding consumer benefits, my argument speaks for itself.

- 2.7 “The benefit-cost balance could be improved by amendments which promoted the accountability of Architects Boards, promoted competition among architects and between architects and non architects, and establish a national system of registration. But these changes would still not overcome the failure of Architects Acts to target consumer and community issues directly and comprehensively. ”

Response: Improving the Architects Act by amendment should be encouraged, repealing the Act should not. Competition already exists for architects. Establishment of a national registration system has my support, but should consumer and community issues in detail be part of the subject matter of an Act of Parliament? This, in my opinion, should occur on a local level.

- 2.8 “Repeal of the Architects Act would mean that architects would be regulated by the same laws as most other building practitioners. Architects would be likely to develop a system of self-regulation...to promote their skills and qualifications to consumers.... ”

Response: In the United States, the NCARB (National Council of Architectural Registration Boards) is a strong organization that offers a wide range of benefits to state member boards, architects, educators, interns, examiners, and consumers. Current Australian proposals for self-regulation seem to be a weaker option. I would like to be more informed about these “same laws as most other building practitioners” to be able to compare. I have included some literature about NCARB for your assistance.

- 2.9 “Greater competition not only is likely to serve the interests of the community, but also the long term interests of the profession. ”

Response: Overly competitive fees are a disservice to the consumer in that it negatively affects the design and documentation of buildings. It is difficult to get full service documents for a partial service wage. Tenders are higher as the builder has to make allowances for lack of full documents. In the end, the product (the building) is deficient and lacking because it was not as well considered as it could have been. There is a false economy here.

3.0 Registration Experience as an overseas trained architect:

I have been informed that the Productivity Commission is seeking information about my experiences in obtaining registration as an overseas-trained architect. I received

my Bachelor of Architecture degree from Syracuse University in New York in 1986. As the second oldest and one of the best Schools of Architecture in the country, it offered a challenging 5-year full time course. Although, not registered in the States, I am familiar with the architectural registration process there. Comments are as follows:

- 3.1 For many years in the States up until 1974, the architecture registration exam was a four day, 36 hour, seven-part examination. Today, it consists of an 8-division examination given over four days every June. Colleagues tell me it may take several years to pass all eight divisions. When you passed, you are certainly well qualified. I think the Australian architects registration exam should be made more comprehensive, covering more technical areas.
- 3.2 Schools of Architecture in the States have 5-year full-time degrees, not part time courses usually offered here. The mandatory apprenticeship after graduation is 3 years before you can sit the exam. Here it is a minimum of only 1 year. In the States, you are referred to as an intern as it is in the medical profession.
- 3.3 I think the AACA exam should be made more objective with technical multiple choice questions and essays rather than the existing subjective 2) half-hourly oral examinations. The personality factor can cloud what you are tested on.
- 3.4 During the American examination, there is an 8 hour design exam where you basically have to design, develop, document, dimension and notate a small municipal building. For the first time in 1997, it was required that this be done on computer, testing your Cad skills simultaneously. I suggest that here, at least a sample portfolio submission be required to verify what the candidate can produce.
- 3.5 The one hour AACA written examination was very good but one question is not enough. I think the written examination should be a minimum of five essay questions on five different subjects, given over four hours.
- 3.6 During my two half hourly oral examinations, I was not asked any questions on the Building Code of Australia, Town Planning procedures, technical construction questions or anything on construction materials, etc. I feel these are very important every-day items to examine. Although I was well prepared for questions on building Contracts and Contract Administration, I believe all candidates should be tested on all aspects of the profession and leave nothing to chance.
- 3.7 In the Unites States, architects are issued a stamp to use for building submissions. Your initials are signed over the stamp imprinted on each drawing in the title block. No submissions are accepted by Councils for building approvals without a stamp. I think the same thing is required throughout Australia. No council should accept drawings by anyone who 1) does not have a university degree in architecture, 2) who does not have the minimum level of experience, and 3) has not passed the AACA examination.

America is a very litigious society, I only see Australia going more this way in the future, unfortunately.

- 3.8 I think that the various Building Designers Associations that are developing only confuse the general public regarding credentials. I think these practitioners should be absorbed into the architectural profession. If they don't have a university degree or have not passed the registration exam and they are practicing and lodging plans with council, regardless of what their experience is, they appear to me to be cutting corners.

In conclusion, I have enclosed a copy of the NCARB "Circular of Information No.1 1993" for your use. I have also included, NCARB and ARE (Architectural Registration Examination) websites which may be of some help to you. I will leave you with a quote from the ARE website:

"One of the important means by which NCARB member boards fulfill their mission to safeguard the public health, safety and welfare is the registration of architects. Every individual may apply for registration as an architect. To become registered, a person must demonstrate that he or she is qualified to render architectural services by meeting established education, training and examination standards."

Yours Faithfully

(signature)

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Architect

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Cc: David Archer AACA

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