



“6 Month Rule” aka “Time Sensitive Reporting”

Q: What is the AIA’s position on Resolution 2008-07, “6 Month Rule”?

- **A:** The AIA sees the proposed six-month rule as an impediment to interns on the path to licensure and requests that NCARB suspend any action to limit IDP reporting periods (through the 6-month rule) until a comprehensive evaluation can be conducted of the new electronic reporting system.

Q: What is the AIA’s position on electronic reporting of IDP Training Units?

- **A:** The AIA fully supports the use of technology in NCARB’s proposed electronic reporting system to validate IDP training units.

Q: When will electronic reporting be in place?

- **A:** It is unclear when electronic reporting will be in place and what features it will include. In order to conduct a thorough and accurate evaluation of a new system, it must be in place, operational and be used for a significant period of time by the end users.

Q: Does the creation of an electronic reporting system need to be tied to a rule that mandates “time sensitive reporting”?

- **A:** No. An electronic reporting system can exist separately from a rule that mandates a period of time in which training units can be reported. The AIA fully supports the use of electronic reporting as it is sure to encourage consistent, time-sensitive reporting.

Q: What is the goal for implementing a “6 month rule”?

- **A:** The goal of the “6 month rule” is to discourage submitting all training units at one time and foster a rich intern experience. The AIA acknowledges NCARB’s concern with training reports submitted in-full at the end of an IDP career. However, the AIA understands that the number of interns who experience difficulties due to the timing of their reporting is relatively small. The AIA anticipates an increase in regular training unit submissions once a fully operational electronic reporting system is in place and, as such, anticipates that, through the new use of this technology, the problem of untimely reporting will be nearly eliminated.

Q: Which stakeholders are held accountable for timeliness of responses?

- **A:** According to Resolution 2008-07, only the intern must record and submit their training units in a timely fashion. Currently, other stakeholders in the IDP process—the System Administrator (NCARB), Mentor, and Supervisor—are not held accountable for timeliness in reviewing, signing

and submitting forms, lost or misplace paperwork, or responding to requests. The AIA supports an Intern Development Program where all stakeholders are held accountable.

Q: Currently, are there any instances where interns lose training units because they do not report on a regular basis?

- **A:** Yes. When a supervisor leaves a firm unexpectedly, whether it be by choice, death, or termination, or a previous employer refuses to sign a form after the intern has resigned from the firm, training units can be lost. Rather than add to this list of instances where training units can be lost or no longer valid, electronic reporting and an incentive program may eradicate these situations. Unfortunately, these types of situations do exist. Through efficient and effective communications, and educating all stakeholders of these potential situations, it is hoped that these instances are eliminated, or at the very least, much less frequent.

Q: How will NCARB's electronic reporting system be tested?

- **A:** Resolution 2008-07 states that implementation will occur once a proven “fully tested and operational” electronic reporting system has been made available to interns; however, no reference currently exists to define who/what represents an “operational” system. The AIA requests a collaborative effort between the AIA and NCARB in satisfying NCARB’s documentation concerns through the examination of “time sensitive reporting” including the evaluation of the new electronic system by an independent third party (or parties) selected jointly by the AIA and NCARB, the appropriate review of the “timeliness” of reporting in this modern context, and the development of recommendations concerning changes to IDP training unit reporting.

Q: How will implementation of the “6 month rule” be communicated to all relevant stakeholders?

- **A:** Resolution 2008-07 states that stakeholders are informed based on...”discussion over the last three years and the delayed implementation dates has given appropriate notice...”. However, very little information has been published and sent out to licensure candidates. The majority of publicity over this issue has been provided by the AIA National Associates Committee due to extreme concern that the majority of interns/candidates are not aware that these changes will jeopardize their ability to become licensed in a timely manner. Finally, it is unclear whether or not a communications plan from NCARB exists to target those who are not currently enrolled in IDP.

Q: Does a “6 month rule” for IDP training units parallel requirements to submit timesheets weekly or to present a project in school in a timely manner?

- **A:** When submitting timesheets on a weekly basis, in most intern training settings, both the intern and the supervisor must sign-off on the hours worked and nature of work. Both parties are trained in how the process works and both parties are of the consequences if the timesheet is not signed-the intern by not being paid and the supervisor as mandated by the employer. In the case of “time sensitive reporting”, the intern is held accountable and potentially penalized for noncompliance, while the supervisor is only strongly encouraged to follow a set of guidelines, yet to be published by NCARB. Similarly, while in an academic setting, both the student and the professor are held accountable for completing projects that document learning each semester—the student for completing their work on time and the professor for submitting a grade in a timely manner as mandated by the school.

Q: Can an individual apply for an extension?

- **A:** Resolution 2008-07 states that NCARB may allow a reasonable extension of the two-month filing period if an applicant submits “a timely written application and supporting documentation;” however, ‘timely’ is not defined nor is there a clear indication of what supporting documentation may be as prescribed by NCARB. The resolution does not state who makes the determination for timely and acceptable documentation. The process for filing an appeal needs to be defined and published. Moreover, since documentation will be required for an extension to be granted, it is unclear if NCARB has a privacy policy in place that complies with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), since personal medical information will be collected and evaluated.

Q: Will paper submissions be accepted?

- **A:** No. Paper submissions of IDP training units will no longer be accepted upon implementation of this new system. Individuals who are not computer savvy may not be able to submit electronically and could ultimately lose training units.