



July 20, 2017

Maureen K. Ohlhausen
Acting Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Economic Liberty Task Force roundtable, “Streamlining Licensing Across State Lines: Initiatives to Enhance Occupational License Portability.”

Dear Acting Chairman Ohlhausen:

The American Society of Landscape Architects (ASLA) appreciates the opportunity to comment on the Federal Trade Commission’s Economic Liberty Task Force roundtable, “Streamlining Licensing Across State Lines: Initiatives to Enhance Occupational License Portability.” We applaud the federal government’s interest in building awareness to better understand the issues and challenges to occupational regulation and public protection.

Established in 1899, ASLA represents more than 15,000 landscape architects who design well-planned, livable communities and lead the way in initiatives such as neighborhood master plans, green infrastructure and stormwater management, high utility transportation corridors, and innovative green streets. Landscape architecture includes the design of iconic and neighborhood places, local parks, residential communities, commercial developments, and downtown streetscapes. Some of the larger well-known examples include Central Park and the High Line in New York City; the U.S. Capitol grounds in Washington, D.C.; the Oklahoma City National Memorial; and Chicago’s Millennium Park.

The fundamental practice of all the licensed design professions, including landscape architecture, architecture, and engineering, is ensuring the public’s health, safety, and well-being. Landscape architects accomplish this through keeping the public safe from hazards, protecting natural resources, sustainably managing the natural and built environment, and enhancing social, economic, cultural, and physical functions.

Landscape architecture is only one of about 60 professions that are licensed in all 50 states. Becoming licensed generally requires a university degree in landscape architecture that includes extensive coursework in science, technology, engineering, and mathematics, plus completion of a period of supervised practice. All states also require passage of a national licensing examination (the Landscape Architecture Registration Examination), administered by the Council of Landscape Architecture Registration Boards (CLARB).

More than ever before, licensure mobility has become extremely important to landscape architects as the profession continues to grow and businesses expand. Currently, more than half of the landscape architects in the United States hold licenses in multiple states. To simplify administrative processes for the licensing board and for the applicant, in some instances landscape architects have the option of submitting a CLARB Council Record. The Council Record is a verified history of the applicant’s credentials. Nearly two-thirds of the jurisdictions in the United States provide the option of submitting a CLARB Council Record.

While enhancing portability through interstate licensing compacts and agreements is not directly applicable to landscape architect licensure, ASLA does have experience with and

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supports the use of model laws. The model used by the landscape architecture profession was developed by CLARB. The CLARB model law and regulations for landscape architecture, which are currently in the process of being updated, provide guidance that affords predictability, commercial efficiency, and enhanced trust in the profession.

ASLA and its membership engage in opportunities to encourage state legislatures and boards to consider the CLARB model law and ensure that all who can demonstrate competence can enter the profession. The success of this advocacy is generally based upon the will and temperament of the state legislature for change, their ability to accept model documents, and the level of engagement.

Throughout the past several years the federal government has increasingly highlighted concerns regarding the amount of licensed occupations, the state-to-state variability in licensure requirements for the same or similar occupations, and the impact of the licensure and portability of licenses for military spouses. While occupational licensure is a state-level responsibility, the federal government should continue to build awareness and understanding of the issues as well as conduct outreach to national associations to help better understand the issues and challenges associated with occupational regulation.

As discussed above, our membership strives to support actions that continually grow the profession and enhance opportunities for portability and economic growth. Thank you again for the opportunity to comment and share our experiences.

Sincerely,



Nancy C. Somerville, Hon. ASLA
Executive Vice President/CEO

