

Governor's Office of Management and Budget

Alexis Sturm

Director



Regulatory Sunset Act Study of

The Landscape Architecture Registration Act

May 8, 2026

**To the Honorable JB Pritzker
Governor of Illinois**

Governor Pritzker:

As required by Section 5 of the Regulatory Sunset Act (5 ILCS 80/1 et seq.), GOMB facilitated a study with the Illinois Department of Financial and Professional Regulation's (IDFPR), the agency responsible for oversight of the Landscape Architecture Registration Act (225 ILCS 316.) (the Act), which is scheduled to be repealed on January 1, 2027. This study provides justification for the recommendation to continue this Act.

GOMB's examination of this Act was conducted considering the factors set out in Sections 6 and 7 of the Regulatory Sunset Act. The following report outlines the work of GOMB's study and details the criteria and data utilized to arrive at the above recommendation.

Respectfully,

Alexis Sturm
Director
Governor's Office of Management and Budget

GOMB Regulatory Sunset Act Report: Landscape Architecture Registration Act

The State of Illinois, acting through the Illinois Department of Financial and Professional Regulation (IDFPR or the Department), licenses the profession of Registered Landscape Architect pursuant to the Act. Four design professions (architect, land surveyor, professional engineer, structural engineer) may be considered related practices.

Landscape architect services include providing preliminary studies; developing design concepts; planning for the relationships of physical improvements and intended uses of the site; establishing form and aesthetic elements; developing those technical details on the site that are exclusive of any building or structure; preparing and coordinating technical submissions; and conducting site observation of a landscape architecture project. A landscape architect's project is subject to local building or zoning codes. Concerns include whether a landscape architect's project harms nature, public or private property, or the public health, safety, and welfare generally. In addition, faulty designs could lead to such construction injuries that stem from tripping hazards or falling objects.

Many businesses provide landscaping services in Illinois. The practice of landscape architecture, however, adds an elevated design element to landscaping such that the term "landscape architecture" is appropriate. Clients of landscape architects seek thoughtful and detailed designs in the landscape of real properties. As such, the landscape architect profession is distinguished from a landscaping business that merely maintains the landscaping on real property.

1. License Count and Fee Structure (5 ILCS 80/6(1) and (3))

As of July 31, 2025, IDFPR states that there are 733 active licenses for Registered Landscape Architect in Illinois. See the following table for the number of licenses issued by IDFPR under this act in the fiscal years indicated:

License Type	FY20	FY21	FY22	FY23	FY24
Registered Landscape Architect	733	768	629	708	730

Registered Landscape Architects have the following licensure fee structure:

License, Credential, or Certification Type	Fee Amount	Online Payment Option
Application Fee	\$100.00	<input type="checkbox"/>
Renewal Fee	\$60.00	<input type="checkbox"/>
Duplicate Fee	\$0	<input type="checkbox"/>
Examination Fee	\$535.00 (each part of four parts)	<input checked="" type="checkbox"/>
Certification Fee	\$20	<input checked="" type="checkbox"/>

Fees were updated July 23, 2025, after more than 20 years at previous levels. Associated Administrative Rules (68 Ill. Admin. Code 1275.75) were also updated. DPR has implemented several technological advancements and staffing assignments to ensure timely review and issuance of applications and

renewals. Fee increases were based on a fiscal review of licensure fees for design professions to ensure adequate funding to regulate this profession through 2040. New rules include fee increases in 2027 to \$175 for applications (increased from \$100) and \$125 biennial for renewal (increased from \$60), and a new certification fee of \$25.

2. Obtaining Certification in Illinois (5 ILCS 80/6(11))

As of mid-July 2025, applicants for registration are required to submit an application through the CORE system, and payments must be made online. This new process enables design unit staff to review and issue the registration within 7-10 business days vs 4-8 weeks under the previous paper application process. The Department provides a guide that includes qualifications here:

<https://idfpr.illinois.gov/content/dam/soi/en/web/idfpr/core/dpr/157-landscape-architect-qual.pdf>

To register as a Landscape Architect in Illinois, applicants must hold a degree in Landscape Architecture accredited by the Landscape Architectural Accreditation Board or meet equivalent educational standards. Pursuant to 68 Ill. Admin. Code 1275.50, applicants are also required to take and pass Landscape Architect Registration Examination (LARE) through the Council of Landscape Architectural Registration Boards (CLARB) and provide proof of completion. The exam can be taken at any Prometric testing facility in the United States. Experience requirements vary. Applicants from approved programs need two years of supervised practice, while those from non-approved programs are required to have eight years of supervised practice. Foreign-educated applicants must provide official, notarized translations of their documents, certified by a qualified translator fluent in both languages who attests to the accuracy of the translation.

3. Equity Concerns (5 ILCS 80/6(10), (12) and (13))

IDFPR states that equity issues may have an impact on individuals seeking to become a licensed landscape architect in the State of Illinois. Financial challenges include the cost to attend college and obtain an advanced degree.

IDFPR is subject to the Language Equity and Access Act (15 ILCS 56/) which permits reasonable accommodations for language, including use of a word-for-word language dictionary and additional time to complete the exam.

IDFPR asserts that it has done its best to minimize any barriers to licensure by requiring universally accepted qualification requirements and imposing fair standards of professionalism.

4. Agency recommendations to change the statute (5 ILCS 80/6(4) and (9))

Because of interrelated scopes of practice, IDFPR recommends that funds associated with the regulation of this Act be deposited into the Design Profession Fund. This fund is utilized for other design professions including architects, land surveyors, interior designers, professional engineers, and structural engineers.

5. Agency efforts to comply with enabling laws (5 ILCS 80/6(3), (4) and (5))

At the time of this study, GOMB is not aware of any compliance issues by IDFPR related to the provisions

of the Act.

The Landscape Architect Registration Board ‘Board’ serves in an advisory capacity and recommends discipline, as well as changes to the Act. The Board meets two to three times a year through public meetings. Board members provide insight to IDFPR about the profession, including recommendations for legislative or Administrative rule changes, participate in informal conferences with licensees that have pending cases, and make recommendations for final disciplinary action after reviewing any and all Administrative Law Judge reports from cases that go to formal hearing.

6. Recent bills introduced by the General Assembly (5 ILCS 80/6(9))

IDFPR proposed and the General Assembly passed Public Act 103-1044 in 2024, regarding foreign education of applicants and endorsement. The Act was amended by Public Act 103-1044, effective 1-1-25, with the addition of §48 – Endorsement, which allows an applicant’s education in a foreign country to be evaluated as part of the application process, as well as additional provisions regarding endorsement for consistency in obtaining other design profession licenses. The Act was also updated in 2023 by Public Act 103-309, effective 1-1-24, which modified §10 – Definitions and added §53 – Continuing Education.

7. Stakeholder Feedback and Protocols for Licensure (5 ILCS 80/6(5), (6), (7), (8), (10) and 5 ILCS 80/7)

IDFPR has public Board meetings to discuss the status of this Act and the profession. The Department also receives and responds to public inquiries and feedback received by email and through the IDFPR website. Feedback from associations in the industry is part of the process of proposing Administrative Rules.

8. Public Outreach (5 ILCS 80/6(5), (6), (7) and (8) and 5 ILCS 80/7)

IDFPR provides multiple avenues for members of the public to contact the Department with comments or concerns about the programs it oversees or the Department’s rules governing its programs. IDFPR conducts public outreach efforts through social media and other external-facing means.

As part of Administrative Rule making with JCAR, draft rules approved by the Governor’s Office are shared with the Board members and associations in the industry for their feedback. Following rule making protocol, IDFPR participates in the public comment process.

9. Industry Standards (5 ILCS 80/6(11) and (12))

IDFPR states that the Illinois personal qualifications required for this profession are in line with industry standards.

American Society of Landscape Architects (“ASLA”) provides the Landscape Architecture Documentation Standards:

Principles, Guidelines and Best Practices guidebook, which can be found here:
<https://www.asla.org/2016awards/171889.html>

The ASLA Standards of Conduct can be found here:
<https://www.asla.org/ContentDetail.aspx?id=6374>

National standards as set forth by the Council for Landscape Architectural Registration Boards ("CLARB") consists of a degree in landscape architecture (or meet the alternative education requirements), minimum two years of experience and passage of the national exam. Here is a link: clarb.org.

10. Public Complaint Resolution (5 ILCS 80/6(3), (7), (8) and (10) and 5 ILCS 80/7)

IDFPR has received one complaint from the public regarding regulated registered landscape architects over the past five fiscal years. There have been no complaints received from registered landscape architects. The Director of the Division of Professional Regulation will issue a Director's Order when resolving complaints regarding IDFPR's regulation of the Act.

The average time for resolution of a complaint is six to seven months. When the Respondent does appear and participate in the process, resolution may take up to a year or more, depending on the allegations involved, if the matter is resolved by agreement between the Department and Respondent in an informal conference, if the Respondent requests continuances, or if it goes to formal hearing with findings made by the Administrative Law Judge, with a Director's Order to follow. Similar to litigation, the time from complaint to resolution varies case-by-case.

The table below outlines the number of complaints received by the Department in the last five years.

License, Credentials, or Certifications Type	FY21	FY22	FY23	FY24	FY25
Registered Landscape Architect	0	0	0	1	0

11. Disciplinary Action (5 ILCS 80/6(14))

The Act sets forth the range of disciplinary actions and the reasons they may be taken. Such actions include suspending registration, revocation, and the imposition of fines.

As documented in the chart in Section 10, there has been one complaint alleging substandard work and unauthorized practice due to a title issue.

12. Conclusion

As communicated in this report, the scope of landscape architect services is broad with the resulting project subject to local building or zoning codes to ensure the design does not lead to construction injuries, tripping hazards or falling objects. Regulation is needed to ensure this profession is delivering projects that do not harm nature, public or private property, or public health, safety and welfare.

The provisions within the Act and the Rules have been modeled with the intent of ensuring the public's health, safety, and welfare are the principal focus. The promulgated provisions of the Act and the Rules mitigate risk by establishing a basis for determining whether an applicant for licensure is fit to practice in Illinois.

Based on the factors in 5 ILCS 80/6 and the additional criteria in 5 ILCS 80/7, GOMB finds that the Act

should be recommended for continuation. The record should expressly state that the public protection benefits of regulation outweigh the regulatory costs and that no less restrictive alternative would adequately address the significant and discernible harms identified in this report.

The Act should be continued to promote and enhance the safety and welfare of the public, without burdening licensees or commerce.

REDLINE INSERTIONS FOR STATUTORY COMPLIANCE REVIEW

[ADD] The following edits should be incorporated into the report before finalization to better demonstrate compliance with Sections 6 and 7 of the Regulatory Sunset Act, 5 ILCS 80/6 and 5 ILCS 80/7.

A. Section 6 Factor-by-Factor Findings

5 ILCS 80/6(1): The report should expressly state that the scope reviewed includes the full range and variety of regulated practices, including any subspecialties, credentials, permits, entities, facilities, or modes of practice identified in the report. For this Act, the scope finding should expressly connect to site design affecting drainage, grading, accessibility, egress, erosion, public improvements, and public safety in the built environment.

5 ILCS 80/6(3): Add a public-interest finding that the administering agency or program has operated primarily to protect the public, and identify any statutory, procedural, budgetary, staffing, technology, or interagency constraints that have impeded or enhanced performance.

5 ILCS 80/6(4) and (9): Where the report states that no statutory changes are recommended, add an affirmative finding explaining why continuation without amendment is sufficient. If modifications are recommended, identify the specific statutory provisions to be amended and explain how each change benefits the public rather than the regulated profession.

5 ILCS 80/6(5) and (6): Add a clearer discussion of whether regulated persons are required to report information concerning the public impact of agency rules, service quality, service availability, economy of service, or industry problems affecting the public. If no such reporting requirement exists, state that fact and explain whether the absence of such a requirement affects the recommendation.

5 ILCS 80/6(7): Add a public participation finding that describes rulemaking notice, public comment, advisory board meetings, stakeholder outreach, or other mechanisms through which the public may participate in agency rules and decisions. The finding should distinguish public participation from participation by regulated licensees only.

5 ILCS 80/6(8): Add complaint-processing metrics or identify the data limitation. The minimum recommended data fields are: number of complaints received, number closed, average or median days to closure, pending inventory, referral to prosecution or hearing, and final outcomes. Metrics should be specific to complaints or documented risks involving defective design, code conflicts, drainage failures, unsafe site conditions, unlicensed practice, and enforcement actions.

5 ILCS 80/6(10) and (14): Strengthen the harm finding by distinguishing significant and discernible public harm from technical noncompliance. The report should use examples, enforcement categories, or complaint data regarding complaints or documented risks involving defective design, code conflicts, drainage failures, unsafe site conditions, unlicensed practice, and enforcement actions.

5 ILCS 80/6(11) and (12): Tie each personal qualification to the public harm it mitigates. Do not merely list education, training, examination, experience, or continuing education requirements; explain why each requirement is necessary for each major activity within the scope of practice.

5 ILCS 80/6(13): Expand the equity discussion to address cost, income, completion/pass rates where available, criminal history barriers, language access, and geographic distribution. For this Act, the equity analysis should specifically address education, experience, examination-part costs, licensure fees, pass rates, and access to supervised experience.

B. Section 7 Continuation Criteria

5 ILCS 80/7(a)(1): Add an express finding that absence or modification of regulation would significantly harm or endanger the public health, safety, or welfare because of site design affecting drainage, grading, accessibility, egress, erosion, public improvements, and public safety in the built environment.

5 ILCS 80/7(a)(2): Add a police-power nexus finding explaining the reasonable relationship between the State's regulation and protection of the public health, safety, welfare, consumer protection, or market integrity.

5 ILCS 80/7(a)(3) and 7(b): Add a less-restrictive-alternative analysis. The report should evaluate

whether private certification, title protection, business registration, bonding, insurance, inspections, civil remedies, facility regulation, disclosures, or government certification would protect the public. The recommended finding is that generic business registration would not address technical competency, coordination with related design professions, or public-safety implications of defective plans.

5 ILCS 80/7(a)(4) and (5): Add a cost-benefit finding addressing whether regulation increases the cost of goods or services, the likely degree of that increase if known, and why the cost is justified by the public harm avoided.

5 ILCS 80/7(a)(6): Add a final primary-effect finding stating whether all facets of the regulatory process are designed solely for, and have as their primary effect, protection of the public rather than economic protection of the regulated occupation.

C. Recommended Report-Level Conclusion Language

[ADD] Based on the factors in 5 ILCS 80/6 and the additional criteria in 5 ILCS 80/7, GOMB finds that the Act should be recommended for continuation. The record should expressly state that the public protection benefits of regulation outweigh the regulatory costs and that no less restrictive alternative would adequately address the significant and discernible harms identified in this report.

D. Data Requests Before Final Publication

Complaint data: Insert annual complaint counts, closure rates, average/median processing time, pending caseload, and dispositions for the most recent five fiscal years, or state that the administering agency could not provide reliable data.

Discipline data: Separate discipline that addresses significant public harm from discipline based only on technical noncompliance.

Equity data: Add available information on fees, education/training costs, examination costs, pass rates, income estimates, geographic access, language access, and criminal-history barriers.

Public participation: Identify JCAR/public-comment procedures, board or committee meetings, stakeholder notices, and public-facing complaint or outreach channels.