

**REPORT OF THE
VIRGINIA BOARD OF COMMERCE ON**

**The Study of the
Need for Certifying
Interior Designers**

**TO THE GOVERNOR AND
THE GENERAL ASSEMBLY OF VIRGINIA**



House Document No. 6

**COMMONWEALTH OF VIRGINIA
RICHMOND
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Department of Commerce

Board of Commerce

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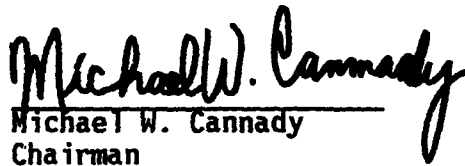
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TO: The Honorable Gerald L. Baliles
Governor of Virginia
and
The General Assembly of Virginia

The report transmitted herewith is pursuant to House Joint Resolution No. 245 of the 1987 Session of the General Assembly of Virginia. Resolution No. 245 requested the Board of Commerce to study the need for certifying interior designers and submit its findings and recommendations to the 1988 Session of the General Assembly.

The Board of Commerce finds that there are no documented cases of harm to the public health, safety or welfare which can support the need for regulating the interior designer profession, but recommends that the General Assembly consider revisions to the building codes to ensure that occupancy permits are not granted to commercial and industrial buildings if the interior furnishings have exceeded flammability and/or toxicity limits.

Respectfully submitted,


Michael W. Cannady
Chairman

MWC:djp

VIRGINIA BOARD OF COMMERCE
REPORT ON THE REGULATION OF
THE INTERIOR DESIGN PROFESSION

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I. EXECUTIVE SUMMARY

A. Study Overview

B. Key Findings

C. Conclusions

D. Recommendations

I. EXECUTIVE SUMMARY

A. Study Overview

This study was conducted to determine the most appropriate level of regulation, if any, for interior design practitioners.

Through survey data and public hearings, this study examined the occupation of interior design, its effect on public health, safety and welfare, existing protection under current law, the public's need for assistance in selecting an interior designer and the regulatory provisions of other states. The level of regulation recommended is based on an extensive analysis of this information.

B. Key Findings

1. Interior design has evolved into an expertise which, at some levels, may require a high level of education and professionalism.
2. The research data provided little documentation of actual harm to public health, safety and welfare due to improper interior design services. However, the changing and complex nature of interior design results in a multitude of options and services which, improperly conducted, have the potential to be hazardous.
3. Consumers may not be able to select a competent interior designer due to the liberal use of the title and the professional associations' numerous designations.
4. An interior designer's work is often unsupervised or unapproved because building and fire codes do not cover all devices and materials used by an interior designer. The appropriate government officials often complete inspections before the designer completes the project.
5. An extensive complaint search revealed little evidence of complaints or abuses. Building officials who inspect interior design work found some problems with practitioners failing to follow building codes, to provide barrier free interiors, and to provide adequate egress. Such failures should be sufficient to deny approvals or occupancy permits.
6. Three states have enacted regulatory provisions for use of the title "interior designer", and the District of Columbia has passed a law which regulates the actual practice of interior design.

C. Conclusions

1. There are no documented cases of harm to the public health, safety or welfare which can support the need for regulating the interior design profession.
2. The public is offered a means of selecting a competent interior designer through the use of professional credentials granted by the national professional interior designer associations.
3. Potential for harm can exist in commercial and industrial buildings if proper flammability and toxicity levels are not maintained.
4. It is premature to judge the effectiveness of the District of Columbia's practice act and the title acts enacted by three states provide little enforcement.

D. Recommendation

1. The Board of Commerce recommends that the General Assembly consider revisions to the building codes to ensure that occupancy permits are not granted to commercial and industrial buildings if the interior furnishing have exceeded flammability and/or toxicity limits.

II. INTRODUCTION

- A. Background Information
- B. Purpose of Report
- C. Methodology
- D. Analytic Procedures

I. INTRODUCTION

A.. Background Information

The Board of Commerce has the legislative mandate for evaluating the need for additional regulation of occupations and making recommendations to the General Assembly.

The guidelines for evaluating the need for this type of regulation were established by the General Assembly and are stated in Section 54-1.26 of the Code of Virginia, (1950, as amended). The levels of regulation and the order in which they are to be considered is as follows: (1) Private civil action and criminal prosecution, (2) Inspection, (3) Registration, (4) Certification and (5) Licensure.

During the 1986 legislative session, the General Assembly passed House Joint Resolution 245 (HJR 245) which requests the Board of Commerce to study the need for certifying interior designers. This report is the result of that study. (See Appendix A for a copy of HJR 245).

B. Purpose of Report

The Board of Commerce devised a study which addressed the following issues:

1. the occupation of interior designers and its changing nature;
2. the effect of this occupation on the public health, safety and welfare;
3. the extent of public protection offered under the laws and regulations governing manufacturing, construction and building occupancy;
4. the public's need for assistance in selecting a qualified interior designer; and
5. the regulatory provisions of other states.

This report serves to outline the results of the study and after considering the findings, to recommend the most appropriate level of regulation, if any, necessary for this occupation.

C. Methodology

The data in this report was obtained from research, from public hearings and from written comments which were submitted from various sources.

A survey was sent to interior designers to identify the education, training and experience of current practitioners. In addition, surveys were sent to users, i.e., hospitals, nursing homes and architects and to associated professions/occupations, i.e. building officials.

The Secretaries of State in the United States were also surveyed in order to obtain information about the types of licensure or regulation of interior designers now in existence or being considered throughout the country.

A search for complaints against interior designers was undertaken by the Department of Commerce through surveys sent to the Virginia Better Business Bureaus, all Consumer Affairs Offices, City/County Attorneys and Commonwealth Attorneys. In addition, public hearings were held on June 10, 1987, in Fairfax; on June 11, 1987, in Richmond; on June 22, 1987, in Roanoke; and on June 29, 1987 in Norfolk.

D. Analytic Procedures

The complaints gathered through the survey and hearing process were examined in terms of the type of service, whether the services provided failed to comply with building codes, health codes and handicap requirements, and the dollar amount of the complaints.

Other states' regulation of interior design services were examined in detail.

Finally, an analysis of the education, training and experience of interior design practitioners in the Commonwealth was completed.

III. KEY ISSUES

- A. Profile of the Occupation
- B. Public Health, Safety and Welfare
- C. Lack of Supervision Under Current Law
- D. Consumer Need for Selection Assistance
- E. Other State Action

III. KEY ISSUES

A. Profile of the Occupation

As a human activity, interior design is older than architecture. According to the American Society of Interior Designers (A.S.I.D.), it is "the total creative solution for a programmed interior."

The function of an interior designer is similar to that of an interior decorator in that they are both concerned with the aesthetic appearance of a space. However, interior decoration is the decorative completion and furnishing of an already planned interior, while design is concerned with all parts of the development of an interior environment.

The rising influence of interior design in contemporary society is largely due to the amount of time most people spend exposed to the environment in the interiors of buildings. While once retained for homes or apartments, interior design services are now used for commercial, industrial, hospital, nursing home and educational buildings. Psychologists, leaders of the arts, or time management consultants offer numerous reasons for the importance of one's environment and the degree of comfort thereto.

The marketplace has also changed in that the field of interior design has become more complex. Needs have changed and expanded. While decades ago designers had only natural substances at their disposal, today, many fabrics, finishes, wallcoverings and floorcoverings contain chemicals of varying degrees of flammability and toxicity.

The use of computers in the home and workplace is an added dimension. The interior designer's knowledge of illumination, reflection, sound transmission, absorption, audibility and electrical systems is crucial in planning for such equipment.

Concurrently with the expanding role of the interior designer, interest has grown in consumer protection and safety throughout the United States. The U.S. Consumer Product Safety Commission was formed with the authority to issue mandatory standards for consumer products. Interior designers must be responsible for specifying interior furnishings which meet these federally-mandated standards.

B. Public Health, Safety and Welfare

Through the various aspects of its study, the Board of Commerce sought to ascertain actual harm or potential threat of unregulated interior designers on the public's health, safety and welfare. The survey data offered little documentation of actual harm to the public. However, data compiled from the building officials

surveyed as well as the practitioners assists the Board in outlining the following potential threats:

1. Evacuation

Emergency situations could occur if a designer did not have knowledge of maximum occupancy limits, length of egress and dead-end corridors, required number of exits, required widths of exits (particularly important for wheelchairs of confined individuals), safety of exits, proper placement of furniture and equipment to assure clear paths to exits, and proper signage to identify exits.

2. Fire

Loss of lives and damage from fire could be enhanced if a designer was not knowledgeable as to the toxicity, flammability, flame spread, flashpoint, melting drip, flame resistance, fire protection treatment and smoke density of the interior furnishings and floor and wall coverings.

3. Handicap Barriers

The mobility of the handicapped would be impeded by a designer's lack of skill in designing aisle widths, door placements and clearance, turning radius, height accessibility, visual acuity and audio impairment in workstations, bathrooms, dining areas, elevators and for signage.

4. Electrical Systems

Strains on air conditioning and heating systems can occur if a designer does not properly calculate computer and office equipment heat output, necessary circuits, power distribution and wire management, as well as preparing for the necessary dedicated circuits for computers or other special equipment.

5. Lighting

Designers must select color, quantity and location of lighting which will not create physical problems or impede production. The increasing use of computer resource terminals must be addressed in order to avoid eye fatigue and strain caused by improper light source or glare and reflection.

6. Ergonomics

Fatigue, back strain, poor circulation of the legs and posture problems can occur if an interior designer is not aware of proper chair and work surface design as it relates to proper posture support, adjustable height, tension backs, arm positioning, lumbar support, seat density and pitch.

C. Lack of Supervision Under Current Law

According to the Committee for Certification of Virginia Interior Designers (CCVID), the entirety of an interior designer's work may be done under supervision or in many cases, it may be done with no supervision. The degree of monitoring or inspection varies with the nature of the project, the stage of the project at which the interior designer is engaged, and the contractual relationship the client may have with the various design professionals.

All licensed design professionals are subject to having their work checked by appropriate government officials. However, in some instances the building, as well as all inspections have been completed and the licensed professionals will have left the scene before the interior designer begins working on the project.

Of the 146 interior designers who responded to the Board of Commerce survey, 55.5% indicated that they often undertake projects where overall supervision or assistance is not provided by a licensed design professional (e.g., architect or engineer). Other responses included:

18.5% seldom
13.0% never
12.3% always

The Building Officials and Code Administrators International, Inc. (BOCA) Code contains exemptions for certain jobs that are deemed minor in nature based on square footage and interior designers often work without architectural supervision in regard to these spaces. However, inspections sometimes are completed and building officials who responded to the survey described the most common types of deficiencies found against interior designers' projects as a) failure to follow BOCA Code, b) failure to offer barrier free interiors, c) failure to provide adequate egress.

D. Consumer Need for Selection Assistance

Surveys of the following users: architects, nursing homes and hospitals revealed "personal associations" or "by reference" as the most prevalent means of identifying an interior designer in Virginia.

The CCVID attributes this means of selection to the fact that there is no standard means available for the public to ascertain the competence of an individual who offers interior design services.

There is a proliferation of organizations in the field of interior design, each with its own criteria for membership and credentialing. The American Society of Interior Designers (ASID) and the Institute of Business Designers (IBD) require passage of an exam by the National Council for Interior Design Qualification (NCIDQ) as well as other criteria for entry into membership. The

NCIDQ exam tests design expertise, history of architecture and interior design concepts, practical business skills, aesthetics, professional practices as well as planning and design problem solving. It endeavors to maintain advanced examining procedures and to revise the examination to reflect current interior design practice.

Of the interior designers responding to the survey, 71.9% held a level of certification awarded by a professional organization with 55.5% obtaining such certification through an examination.

However, unless the public is aware of these professional associations and can distinguish the associations which have high membership standards, there is no assurance of professional competence.

E. Other States

In order to gather information about the ways in which other states regulate interior design practitioners, a survey was sent to the Secretaries of State around the country. Thirty-four states responded, of which 97.1% do not regulate interior designers. (See Appendix B for Survey).

Alabama, Louisiana and Connecticut have enacted title acts and in 1986 the District of Columbia approved a practice act. The following definition of title act versus practice act is provided by the NCIDQ:

Title Act - prohibits anyone not licensed from holding out or identifying themselves as a member of the profession, but not prohibiting practice or performance of services.

Practice Act - prohibits the actual practice or performance of professional services by anyone not duly licensed.

In the Commonwealth of Virginia, certification would be considered a title act and licensure would be the equivalent of a practice act.

The existing state statutes vary in other degrees--Connecticut being the only one which does not include guidelines for establishing a state board to enforce the act. The Alabama and Louisiana statutes follow the NCIDQ requirements for education and experience as qualifications for the examination.

It is also important to note that the grandfather clauses vary to a great extent. The District of Columbia's law allows anyone doing business in interior design in the past three years to qualify for a license without taking the examination. The D.C. law does not include any educational requirements.

Legislation for the regulation of interior designers is being considered in numerous states at this time. Again, the type of regulation varies greatly; i.e., New York is considering a certification process which would require an exam on only the fire safety and barrier free codes for anyone practicing interior design in the past three years.

Some of the statutory language used by these state legislatures was taken from a model statute included in NCIDQ's 1975 study on statutory licensing. The NCIDQ report concluded that there are two reasons for considering a title act to be preferable to a practice act for interior designers:

- 1) The difficulty in adequately defining the practice of interior design so as not to encroach on other professions; and
- 2) not being able to properly exempt persons who might have legitimate activities unreasonably restricted by the practice regulations in the statute.

While the report acknowledges that a title act only restricts use of professional name or title, the NCIDQ believes that it protects the public interest by preventing unlicensed persons from attracting members of the public by use of the professional designation.

A major difficulty with the enactment of a title act arises when a person duly licensed in one jurisdiction attempts to discuss providing services to a potential client in a jurisdiction in which the practitioner is not licensed. While a practice act would allow such discussion and then require a license upon rendering services, a title act prohibits the reference to oneself as a "certified or licensed interior designer".

IV. RESEARCH AND COMPLAINTS

- A. Methodology
- B. Practitioner's Survey
- C. Consumer Affairs and Better Business Bureaus
- D. Commonwealth Attorneys
- E. City/County Attorneys
- F. Building Officials
- G. Users
- H. Public Hearings
- I. Written Comments

IV. RESEARCH AND COMPLAINTS

A. Methodology

Due to the high direct and indirect costs inherent in regulation, it was necessary to conduct an extensive search and analysis of complaints and abuses to ensure that any problems are properly addressed at minimal cost and in the most efficient and effective manner possible.

The following section will analyze data compiled from the Board of Commerce surveys in addressing the issues set forth in the purpose of this report (page 1).

B. Practitioners Survey

Interviews and a questionnaire were conducted with representatives of the Committee for the Certification of Virginia Interior Designers, the proponent of HJR 245, to provide insight and statistical data concerning the practice of interior design. The information gathered is reflected throughout this report. (See Appendix C for copy of questionnaire.)

The Department of Commerce identified 305 interior designers to be surveyed; 146 responded to the survey. Sixty-four or 43.8% had 1-10 years experience; 60 or 41.2% had 11-30 years experience; and 12 or 8.4% had 31-50 years experience. The education of current practitioners was described as COLLEGE/UNIVERSITY - 58.4%; SPECIAL COURSES - 7.6%; APPRENTICESHIP - 7.1%; SELF-STUDY - 4.6%.

Only 33% of the responding practitioners indicated that 50-100% of their work in the last year had been assisted or supervised by an architect or engineer, while 41.8% said 1-50% of their work had been supervised. The majority of the respondents indicated some knowledge of the BOCA - 15.8% EXTREMELY; 51.4% SOMEWHAT; 21.9% VERY; 7.5% NONE. (See Appendix D for Practitioners Survey.)

C. Consumer Affairs and Better Business Bureaus Survey

There are twelve Consumer Affairs Agencies and four Better Business Bureaus in Virginia which were surveyed and asked to describe the severity and frequency of problems with interior designers in their localities. Eight of the sixteen responded and all eight responses fell into the categories of NONEXISTENT or MINOR in describing the seriousness of problems and either NEVER or RARELY in describing the frequency. (See Appendix E for Consumer Affairs Survey; Appendix F for Better Business Bureau Survey).

Nature of Complaints: The six complaints identified by the respondents were either regarding poor quality of work or contract dispute over cost. There were no valid claims determined as a result of the complaints.

D. Commonwealth Attorneys Survey

Twenty-eight of the fifty Commonwealth Attorneys responded to the survey - of those responding, 85.7% described the seriousness of problems with interior designers as NONEXISTENT while the remaining 14.3% referred to the problems as MINOR. (See Appendix G for Commonwealth Attorney Survey.)

Nature of Complaints: The complaints mentioned by respondents were contract term dispute (\$700 value); poor quality of work (\$1,500 value); and large pre-payments required for furniture never delivered (\$5,000 value).

E. City/County Attorneys Survey

Forty-six of 84 attorneys responded to the same survey circulated to the Commonwealth Attorneys. The respondents categorized the seriousness of problems with interior designers as 71.1% NONEXISTENT; 26.1% MINOR and 2.2% MODERATE. (See Appendix H for survey.)

Nature of Complaints: One complaint was issued for a contract term dispute (\$2,000 value) and one complaint for failure to satisfy handicap requirements (\$5,000).

F. Building Officials Survey

In an attempt to gather information about interior design practitioners in Virginia from associated occupations, the Board surveyed 163 building officials. Forty-six responses were received. The building officials responding identified problems to be more serious in nature - 47.8% NONEXISTENT; 37% MINOR; 10.9% MODERATE; 2.2% SEVERE. (See Appendix I for survey.)

The common types of deficiencies found in projects designed by interior designers included 1) failure to follow BOCA; 2) failure to offer barrier free interiors; 3) failure to provide adequate egress; 4) use of interior finishes which have not met flammability and toxicity tests; and 5) failure to meet fire suppression and safety requirements. Of the building officials responding, 60.9% felt that state certification would improve protection of public health, safety and welfare, improve design considerations for the handicapped and provide a greater assurance of professional qualification than is provided by private professional credentialing programs (23.9% did not).

G. Users Survey

The Board surveyed users of design services --185 nursing homes, 110 hospitals, 212 architects. Combined responses of the three groups totaled 357. The problems described by the respondents were categorized as 37.2% MINOR; 18.8% MODERATE; 6.8% NONEXISTENT and 2.8% SEVERE. Likewise, only 25 respondents or 5% had been injured in any way as a result of poor or incompetent services. (See Appendix J for User Survey.)

In their efforts to locate a qualified interior designer, 34.0% had been referred; 32.6% had a personal association; 5.4% had used the yellow pages or a local advertisement and 8.8% had used a bid process. When asked whether the designer selected held a designation or credentials from a private professional organization, 34.2% responded yes; 27.0% did not know.

H. Public Hearings

Four public hearings were conducted by the Board of Commerce to gather information detailing the nature of interior design services and to hear complaints relating to the occupation. The hearings were held in Fairfax on June 10, 1987, in Richmond on June 11, 1987, in Roanoke on June 22, 1987, and in Norfolk on June 29, 1987.

Support for regulation of the interior design profession was expressed by a majority of the sixty-six individuals testifying. Many of those represented were members of the American Society of Interior Designers (ASID), the Institute of Business Designers (IBD) and/or the Committee for Certification of Virginia Interior Designers (CCVID).

Two practitioners testified in opposition to regulation. One practitioner was concerned that certification or licensure would not address the problem and that existing regulations should be amended to delete exclusionary terms and clauses which infringe on a designer's ability to work independently. The other practitioner expressed the need to separate commercial from residential certification in order that practicing residential designers could continue to offer services without meeting the testing requirements for commercial design.

Support for regulation was also presented by the Virginia Retail Merchants Association, the Roanoke County Fire Marshal's Office, the Virginia Building Officials Association and a few users of interior design services.

The Virginia Citizens Consumer Council hesitated to support regulation due to their limited base of consumer complaints and their concern that regulation would not eliminate problems of non-compliance with building codes.

The American Institute of Architects (AIA) opposes state regulation of interior designers and this position was echoed by the Virginia Society of the AIA. However, one engineer and one architect testified in support of regulation as a means of identifying qualified practitioners.

The Virginia Floor Covering Association offered neither support nor opposition to regulation, but outlined some of the existing differences and qualifications required for residential interior design versus that necessary for commercial and industrial work. The Association representative expressed concern that some practicing designers with formal education and years of experience would fail a required exam due to lack of training or experience in certain aspects of interior design--knowledge of which may not be required in the services they render.

While most of the testimony centered around the potential for harm and the changing nature of interior design, the following specific cases involving public health, safety and welfare in Virginia were presented:

- carpet installed in a hospital resulted in two patient falls and the inability to push wheelchairs; replacement carpet being sought with \$9,000 cost in hospital down time;
- carpet installed in a data processing area of a government center did not meet required specifications for a computer room; electrostatic charge generated by the carpet resulted in damage to computer systems in excess of \$10,000;
- carpet installed in a health care facility didn't pass flammability standards and the facility was put on probation; loss of reputation and down time;
- drapes used by a building did not meet fire codes and when treated were unfit for use; \$8,000 for drapes which were discarded;

All of the above mentioned examples were highlighted as cases in which incompetent interior design services were rendered.

The Roanoke County Fire Marshal also recalled a case in which a resident of a mobile home died of cyanide poisoning from the furnishings in the burning mobile home.

(See Appendix K for Cumulative List of Public Hearing Participants.)

I. Written Comments

Thirty-three written comments were submitted for the purpose of being placed in the official records of this interior design study. (Appendix L is a Cumulative List of Written Comments). The written comments include the following:

Supporting Arguments: In addition to the practitioners who issued support, comments were received from an electrical contractor, several users of interior design services, an attorney who reported a case in which a hotel was sued when a piece of its lobby furniture resulted in harm to a guest; the Virginia Fire Prevention Association; the Virginia Fire Services Board; and a hotel owner who views regulation as a step toward avoiding potential liability issues.

Opposing Arguments: Southern Home Furnishings Association located in North Carolina and the Virginia Association of Professions issued statements in opposition to regulation. One interior design practitioner also argued that regulation will impede competition in the marketplace and that testing requirements similar to that of NCIDQ would be unfair and partial to certain associations' members.

V. SUMMARY

A. Findings

B. Conclusions

V. SUMMARY

A. Findings

Virginia law states that it is the policy of the Commonwealth to regulate certain professions only when the public interest is clearly at stake and only if certain conditions are met.

In determining the proper degree of regulation, if any, Section 54-1.26 (B.1-10), Code of Virginia, (1950, as amended), directs the Board of Commerce to determine the following:

B.1 Whether the practitioner performs a service for individuals involving a hazard to the public health, safety or welfare, if unregulated.

The research data provided little documentation of actual harm to the public. However, the Board, in studying the changing nature of interior design, recognizes that interior designers are providing services which if improperly conducted could be potentially dangerous and a hazard to public health, safety and welfare.

The public welfare concern must be examined in regards to a commercial relationship between a designer and the client. Examples were offered in survey data and in the public hearings of situations in which improper design services resulted in a financial loss to the client. These examples are stated in Public Hearings, Section IV, H of this report.

B.2 The view of a substantial portion of the people who do not practice the particular profession, trade or occupation.

The users of interior design services who testified or completed a survey were almost equally divided as to whether state certification of interior designers would improve protection of public health, safety and welfare, improve design considerations for the handicapped or provide more assurance of professional qualification.

B.3 The number of states which have regulatory provisions similar to those proposed.

Alabama, Connecticut and Louisiana have enacted legislation which restricts the use of the title "interior designers" to those who pass a qualifying test. The District of Columbia's law establishes a qualifying examination, but no education requirements for anyone doing business as an interior designer. Numerous other states are considering various regulatory provisions.

B.4. Whether there is sufficient demand for the service for which there is no substitute not likewise regulated and this service is required by a substantial portion of the population.

As outlined in the KEY ISSUES section of this report, the need for interior design services is growing as more emphasis is placed on renovation of existing buildings and as consumers become more aware of the multitude of design options available.

In addressing the issue of whether substitute services exist which are currently regulated, it must be acknowledged that the American Institute of Architects has taken the position that public health, safety and welfare in the building design industry is the responsibility of the architects and engineers who are currently regulated.

B.5 Whether the profession, trade or occupation requires high standards of public responsibility, character and performance of each individual engaged in the profession, trade or occupation, as evidenced by established and published codes of ethics.

The various design professional associations do require adherence to their own ethical code, however, membership in an association is voluntary.

B.6 Whether the profession, trade or occupation requires such skill that the public generally is not qualified to select a competent practitioner without some assurance that he has met minimum qualifications.

The NCIDQ, in its effort to regularly examine the professional field and update its examination, identified a list of competencies in order of their importance in the practice of interior design. Over 100 different items ranging from space planning to history were included.

The diversity of the occupation makes it difficult for consumers to identify an interior designer from an interior decorator and secondly to obtain assurance of competence for complex projects, particularly commercial and industrial projects.

B.7 Whether the professional, trade or occupational associations do not adequately protect the public from incompetent, unscrupulous or irresponsible members of the profession, trade or occupation.

Since a professional organization's main focus is internal; i.e. to provide for and promote the profession, its ability to protect the public is questionable. An association's only mechanism for evaluation is peer review and the only punishment is restriction or denial of membership.

B.8 Whether current laws which pertain to public health, safety and welfare generally are ineffective or inadequate.

Building codes and fire codes cover the use of some but not all devices and materials used in the practice of interior design. The Virginia architectural license regulations have an exclusion for buildings that are 5,000 square feet, 2 1/2 stories or less. Interior designers often work without architectural supervision in regard to these spaces.

In addition, situations occur in which appropriate government officials have completed inspections and the interior designer is left unsupervised to complete the work.

B.9 Whether the characteristics of the profession, trade or occupation make it impractical or impossible to prohibit those practices of the profession, trade or occupation which are detrimental to the public health, safety and welfare.

Protection for the public could only be achieved if practitioners were required to meet set qualifications before practicing or offering interior design services.

B.10 Whether the practitioner performs a service for others which may have a detrimental effect on third parties relying on the expert knowledge of the practitioner. (1979, c. 408.)

The services of an interior designer are primarily affected by the client. However, public exposure to commercial and industrial sites could result in harm if improper interior design services were used.

B. Conclusions

After considering the research, the following conclusions can be made with regard to the regulation of interior designers:

- 1) The occupation of interior designers has become more complex in nature, requiring expertise in a multitude of areas.
- 2) There are some identifiable areas of potential harm to public health and safety, but no documented cases of actual harm to the public in Virginia. A few documented cases were provided by practitioners seeking certification as to harm to public welfare as it relates to increased liability and financial and productivity losses.

- 3) The public's use of interior design services has grown considerably. Practitioners seeking certification feel the public is unable, due to lack of education and/or confusion over professional organizations' credentialing, to receive assurance of professional competence in the selection process. However, users surveyed did not substantiate this argument.
- 4) Existing laws and codes provide limited protection from incompetent interior design services.
- 5) Three states have enacted regulatory provisions for use of the title "interior designer", and the District of Columbia has passed a law which will regulate the actual practice of interior design.

VI. ALTERNATIVES AND RECOMMENDATIONS

- A. General Considerations**
- B. Statutory Changes**
- C. Status Quo**
- D. Certification**
- E. Licensure**
- F. Statement of Recommendation**
- G. Board of Commerce Recommendations**

VI. ALTERNATIVES AND RECOMMENDATIONS

A. General Considerations

In many cases, regulation can be an effective means of dealing with problems in the marketplace. The concept implied behind a regulatory scheme is that regulation will be more effective than the free market systems and civil remedies in weeding out incompetent and dishonest practitioners.

In order for regulation to be effective, occurrences of abuses have to be recognizable, of a significant magnitude, and occur often enough for the regulation to have any impact.

The following are the degrees of regulation in the order in which they must be considered as specified by Section 54-1.26 of the Code of Virginia, (1950, as amended):

1. Private civil actions and criminal prosecutions - Whenever the Board finds that existing common law and statutory causes of civil action or criminal prohibitions are not sufficient to eradicate existing harm or prevent potential harm, it may first consider the recommendation of statutory change to provide more strict causes for civil action and criminal prosecution.
2. Inspection and injunction - Whenever the board finds that current inspection and injunction procedures are not sufficient to eradicate existing harm, it may promulgate rules consistent with the intent of this chapter to impose more adequate inspection procedures and to specify procedures whereby the appropriate regulatory board may enjoin an activity which is detrimental to the public well-being, it may consider recommending to an appropriate agency of the Commonwealth that such procedure be strengthened or it may recommend statutory changes in order to grant to an appropriate state agency the power to impose sufficient inspection and injunction procedure.
3. Registration - Whenever the Board finds it necessary to determine the impact sustained by the public from the operation of a profession or occupation, it may implement a system of registration.
4. Certification - Whenever the public interest might well be protected by the Board's granting a designation of professional competence in order that persons may have a substantial basis for relying on the services of a practitioner, then it may implement a system of certification.
5. Licensing - Whenever it is apparent to the Board that adequate regulation cannot be achieved by other means than licensing, it may establish licensing procedures for any particular profession or occupation.

The alternatives set forth herein are provided to assist the Board of Commerce in determining the appropriate level of regulation for the practice of interior design.

B. Statutory Changes

Amendments to the building codes could help ensure more inspections of interior design projects, but the multitude and variety of local building ordinances would prevent much effectiveness.

C. Status Quo

The Board of Commerce could recommend that regulation of the interior design profession is unnecessary and that the marketplace should continue to regulate itself.

PROS:

1. No expense to the public or the profession would be incurred.

CONS:

2. The potential for harm could increase and financial and productivity losses as well as liability cases could occur more frequently.

D. Certification

A recommendation to implement a system of certification would allow the Board of Commerce to grant a designation of professional competence in order that consumers may have a substantial basis for relying on the services of a practitioner. The certification process could include minimum requirements for education and experience and/or an examination of competency.

PROS:

1. Since certification merely creates a protected title, this alternative would not displace or restrict those individuals who might have legitimate activities from continuing to practice.
2. The scope of practice of any other profession, either regulated or not regulated, would not be affected.
3. Consumers would be given a basis upon which to select services of a practitioner.

CONS:

1. Since certification would be voluntary, and therefore not required in order to practice the profession, enforcement would have little effect on protecting the public.
2. Jurisdictional disputes could arise when a person duly licensed in one jurisdiction attempts to discuss providing services as a "certified interior designer" in a jurisdiction in which the practitioner is not regulated.
3. An increased expense to the practitioner (and to the consumer of the services) would be inherent in this alternative. Based upon the biennial budget figures of comparable sized programs already in existence at the Department of Commerce, it is estimated that the operating costs for an interior design certification/licensure program would be \$60,000 - \$80,000 for a biennium. If there are an estimated 1,200 - 1,500 regulants, the operating costs for certification/licensure would be approximately \$50.00 per individual. This presupposes normal enforcement activity. If the number of complaints is higher than usual for a program of this size, then the cost to the regulated public also increases. It is likely that the Department would contract out the administration of any examination which is deemed appropriate and that amount would be an added cost separate from the licensing or certification fee. Without knowing the scope of such an exam, it is not possible to predict what related fees would be.

E. Licensure

A recommendation for licensure would require all individuals who wish to practice interior design to qualify for a license. As determined by the Board of Commerce, the requirements for licensure could include minimum education and experience requirements and/or an examination of competency.

The licensure regulations could also include grandfathering provisions which would automatically grant licenses to individuals who have met experience requirements and/or achieved professional association credentials. Another option would include an examination on only specific areas of design for those individuals who meet experience requirements.

PROS:

1. Licensure provides a mechanism for enforcement which would include a centralized clearinghouse for consumer complaints.
2. This alternative would be the only regulatory mechanism available to restrict the activity of unscrupulous or incompetent practitioners.

CONS:

1. This alternative would be the most expensive and most restrictive form of regulation.
2. An increased expense to the practitioner (and to the consumer of the services) would be inherent in this alternative (see D above for cost analysis).
3. Without grandfathering provisions, individuals whose livelihood has been in interior design may be disfranchised unless licensing requirements are met.
4. While licensure is to protect the public, no assurances can be given if liberal grandfathering provisions admit current practitioners.
5. The complexity of interior design has resulted in specialization by some practitioners. If licensure were recommended, practitioners would have to satisfactorily pass an exam covering all aspects of the profession.

Another option within the licensure alternative is for licensing of only the commercial and industrial application of interior design services.

PROS:

1. This alternative would not displace current practitioners whose work is primarily residential in nature and who may not be able to meet examination requirements which cover aspects of commercial design as well.

CONS:

1. If the purpose for licensure is public safety, residential concerns would still be at risk.
2. No aspect (i.e., provide carpets only) of a commercial/ industrial design could be completed by an unlicensed practitioner unless the licensed practitioner maintains responsibility for the entire interior design project.

F. Statement of Recommendation

If the Board of Commerce finds there is not sufficient evidence to support a licensure program, it could recommend that all users of commercial and industrial services employ an interior designer who holds a credential from a professional association and has passed an examination.

PROS:

1. This alternative would provide some assurance of protection for commercial and industrial design.
2. No expense to the public or the profession would be incurred.

CONS:

1. No means of enforcement would be available.

G. Board of Commerce Recommendation

1. The Board of Commerce recommends that the General Assembly consider revisions to the building codes to ensure that occupancy permits are not granted to commercial and industrial buildings if the interior furnishings have exceeded flammability and/or toxicity limits.

VII. APPENDICES

- A. House Joint Resolution 245
- B. Secretaries of State Survey and Results
- C. Questionnaire for CCVID
- D. Practitioners Survey and Results
- E. Consumer Affairs Agency Survey and Results
- F. Better Business Bureau Survey and Results
- G. Commonwealth Attorneys Survey and Results
- H. City/County Attorneys Survey and Results
- I. Building Officials Survey and Results
- J. Users Survey and Results
- K. Cumulative List of Public Hearing Participants
- L. Cumulative List of Written Comments
- M. Position Paper of the Virginia Fire Prevention Association, Inc.

GENERAL ASSEMBLY OF VIRGINIA -- 1987 SESSION
HOUSE JOINT RESOLUTION NO. 245

Requesting the Board of Commerce to study the need for certifying interior designers.

Agreed to by the House of Delegates, January 30, 1987
Agreed to by the Senate, February 19, 1987

WHEREAS, the citizens of the Commonwealth of Virginia have become more aware of the need for safe interior environments in their workplaces, public accommodations, health care institutions, government buildings and homes; and

WHEREAS, the proper construction and furnishing of interior environments require a technical knowledge of building codes, fire codes, flammability and toxicity ratings, lighting, interior construction and ergonomics; and

WHEREAS, interior designers must possess knowledge and skills which are far more comprehensive and exacting than those required of interior decorators, whose primary function is aesthetic; and

WHEREAS, the public does not have a uniform and readily understandable means of identifying those interior designers who, by reason of their education and experience, are able to provide the skills necessary to ensure the health, safety and welfare of their employees, customers, residents and families while occupying interior spaces; and

WHEREAS, three states and the District of Columbia have passed legislation and a number of other states are considering legislation which regulates persons who purport to be qualified interior designers; and

WHEREAS, the Board of Commerce is authorized by § 54-1.25 of the Code of Virginia to evaluate professions not regulated in the Commonwealth for consideration of whether such professions should be regulated, and to make recommendations as the public interest requires to the General Assembly concerning regulation; now, therefore, be it

RESOLVED by the House of Delegates, the Senate concurring, That the Board of Commerce is requested to study the need for certifying interior designers in the Commonwealth. The Board shall submit its findings and recommendations to the 1988 Session of the General Assembly.

STATE _____
CONTACT PERSON _____
PHONE # () _____

Return To:
Laster G. Thompson, Jr.
Department of Commerce
3600 West Broad St.
Richmond, VA 23230

34 Responses of 48 Surveys

AGENCY SURVEY
(INTERIOR DESIGNERS)

Section A

1. Does your State regulate interior designers? 2.9% yes 97.1% no
If "no" answer questions in Section A only.

2. How would you describe problems with interior designers in your area?
(Circle the appropriate number)

1 38.2% 2 26.5% 3 4 5 35.3%
nonexistent minor moderate severe very severe missing

3. How would you describe the frequency of problems with interior designers?

1 35.3% 2 29.4% 3 4 5 35.3%
never rarely occasionally regularly continuously missing

4. Do you feel that there is a problem with abuses by interior designers in your area?

 Yes 64.7% No 35.3% missing

5. Total number of complaints against interior designers last year.

1 response of 24 97.1% missing

6. Please describe the most common types of complaints made against interior designers:

- a. Disatisfaction with completed project
- b. False representation as an interior designer
- c. Defective merchandise used

7. What is the approximate average dollar value of these complaints?

1 response of \$100; 1 response of \$1,500 94.1% missing

8. Is regulation of interior designers being considered or studied in your state? 2.9% Yes 70.6% No 26.5% missing

SECTION B

REGULATIONS

1. What category best describes interior designer regulations in your state? 97.1% missing

Registration - any person may engage in an occupation, but that person must submit certain information to the appropriate authorities.

2.9% Certification - any person may practice the occupation but only those who have met certain standards may use the title "Certified Interior Designer."

Licensure - a person is prohibited from engaging in the occupation without meeting certain standards and obtaining a license.

2. Which of the following groups are being regulated? (check more than one if necessary)

interior design business 97.1% missing

2.9% interior designer (individuals)

interior decorators

3. Does your state have an interior designer's Board or Commission?

2.9% Yes 5.9% No 91.2% missing

- a. If yes, what year was the Board or Commission created?

1984 - 2.9% 97.1% missing

- b. Is the Board or Commission an independent state agency? 2.9%yes no
97.1% missing

- c. Is the Board or Commission advisory? Yes 2.9% No 97.1% missing

4. Are interior designers required to be bonded? Yes 5.9% No
94.1% missing

5. What type of examination does your Board or Commission give?

Written Practical Both None 100% missing

6. What percentage of applicants pass the examination? 100% missing

percent that pass written

percent that pass practical

percent that pass both

EDUCATIONAL REQUIREMENTS

7. Does your board or commission "approve" interior design programs?

2.9% Yes 2.9% No 94.1% missing

8. If yes, is the curriculum of the schools set by the board or commission?

 Yes 2.9% No 97.1% missing

9. Does your state allow apprenticeship programs as an alternative to school programs?

 Yes 5.9% No 94.1% missing

10. Do regulations require that all applicants graduate from interior design programs?

 Yes 5.9% No 94.1% missing

11. What level of education is required prior to entry into the profession?
(check more than one if necessary)

 less than high school

 high school graduate

2.9% college graduate

2.9% none of the above

94.1% missing

THANK YOU FOR COMPLETING THIS SURVEY--YOUR INPUT IS IMPORTANT



COMMONWEALTH of VIRGINIA

Department of Commerce

DAVID R. HATHCOCK
Director

3600 WEST BROAD STREET RICHMOND, VIRGINIA 23230-4917

RONALD K. LA YNE
Senior Deputy Director

March 10, 1987

Mr. Mark Rubin, Esquire
Suite 605 - Mutual Building
Post Office Box 675
Richmond, Virginia 23206

RE: Interior Designers Study

Dear Mr. Rubin:

The Committee for Certification of Virginia Interior Designers advised the Board of Commerce on its position regarding the need to certify interior designers. Your organization, as a primary proponent of HJR 245, is requested to provide some insight and statistical data concerning the practice of interior design. This information will be useful to the Board of Commerce in the discharge of responsibilities mandated by HJR 245.

I am appreciative of the cooperative spirit that you expressed, during our communication on Friday, toward providing this assistance and look forward to meeting with you on March 13, 1987.

Section 54-1.26 B, Code of Virginia, establishes the criteria to be used by the Board of Commerce to determine a proper degree of regulation of a profession or occupation. A copy is attached for information and reference.

To assist the Board of Commerce the Committee for Certification of Interior Designers is asked to respond to the following questions.

GENERAL INFORMATION

A. GENERAL INFORMATION

1. Identify by title the associations, organizations, or other groups representing Virginia-based practitioners. (Provide the information requested below for each organization.)
 - Estimate the number of practitioners (members and non-members) in Virginia.

2. Do other organizations also represent practitioners of this occupation/profession in Virginia? If so, provide contact information for these organizations.
3. Are there other occupations/professions within the broad occupational grouping? What organization(s) represent these entities? (List those in existence and any that are emerging.)
4. For each association or organization listed above, provide the name and contact information of the national organizations with which the state associations are affiliated.

**QUESTIONS WHICH ADDRESS CRITERIA FOR THE
REGULATION OF OCCUPATIONS AND PROFESSIONS**

- B. CRITERION: The unregulated practice of an occupation will harm or endanger the health, safety, and welfare of the public. The potential for harm is recognizable and not remote or dependent on tenuous argument.
1. Describe the functions typically performed by members of this occupational group.
 2. What aspects of the practice of the occupation constitute a potential for harm to the public?
 3. What physical, emotional, mental, social, or financial impairment would result from incompetent or inappropriate practice, or practitioner error?
 - Has the public been harmed?
 - How has this harm been documented?

Example: What court cases can be cited to show scope of malpractice in states that do not regulate this occupation?

Example: What court cases can be cited in states that do regulate this occupation?
 4. To what can the harm be attributed?
 - lack of knowledge
 - lack of skills
 - lack of ethics
 - lack of supervision
 - other (please elaborate)

C. CRITERION: Practice of an occupation requires a high degree of skill, knowledge, and training, and the public requires assurance of initial and continuing occupational competence.

1. What are the educational or training requirements for entry into this occupation?
 - attach a sample curriculum for meeting these requirements
 - are these training programs in Virginia? Please attach a list. If there are no programs in Virginia, provide information on programs in adjoining states, the region, or nationally that prepare practitioners for practice in Virginia.
2. Are these programs accredited? By whom?
3. Are there state, regional, or national examinations available to assess entry-level competence?
 - Who develops and administers these examinations?
 - What areas of competence are tested by the examination?
 - How are the examinations validated?
 - Attach an outdated or retired examination, if available?
4. What assurances of professional competence do the public already have (private credentialing, institutional standards, etc.)?
5. Why are these assurances inadequate?

D. CRITERION: The functions and responsibilities of the practitioner require independent judgment, and the members of the occupation group practice autonomously.

1. Describe the nature of the judgments and decisions which the practitioner must make in his practice.
2. What functions typically performed by this occupational group are unsupervised, that is, neither directly monitored nor routinely checked?
3. What functions are performed only under supervision?
 - Is the supervisor a member of a regulated profession? Please elaborate.

4. Describe a typical work setting, including supervisory arrangements and interaction of the practitioner with other regulated or unregulated occupations and professions.

E. CRITERION: The scope of practice of an occupation is distinguishable from other licensed and unlicensed occupations.

A. Please review your response to B.1. above.

- Which functions of this occupation are similar to those performed by other occupational groups? Which groups? Please be specific and complete in your description.
- Which of these functions are distinct from other occupational groups? Please be specific and complete in your description.
- How will the regulation of this occupational group affect the scope of practice of other occupational groups (either regulated or unregulated).

F. CRITERION: The economic impact on the public of regulating this occupational group is justified.

1. What has been the effect on salaries or income of practitioners in states in which the occupation is regulated?

2. What has been the effect on typical fees-for-service for those services provided by this group in regulated states?

3. What are typical salaries or income levels of practitioners in Virginia (last available figures)? In the region in comparable years? In the nation in comparable years?

4. What are typical current fees-for-service in Virginia?

5. Are there current shortages or oversupplies of practitioners in this occupational group in Virginia? In the region? In the United States?

6. Are there shortages or oversupplies of practitioners in related or closely similar occupations?

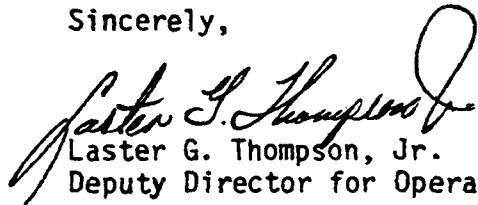
G. CRITERION: There is no adequate alternative(s) to regulation (i.e., licensure, statutory certification, or registration) that will protect the public.

Mr. Mark Rubin, Esquire
March 10, 1987
Page 5

1. What laws or regulations currently exist to govern:
 - devices and materials used in practice
 - standards of practice, and
 - types of facilities for which practitioners may provide services.
2. Does the occupational group participate in a non-governmental credentialing program, either through a national certifying agency or a professional association? How are standards set and enforced in this program?
3. Describe any peer group evaluation mechanisms that exist in Virginia (or elsewhere, if not in Virginia).
4. If standards are set and enforced by existing organizations (1, 2, and 3 above), explain the enforcement mechanisms and typical sanctions that are imposed upon proof of misconduct?
 - Does a Code of Ethics exist for this profession? Who established the Code, and how is it enforced? Is adherence mandatory or voluntary?
5. Does any means exist within the occupational group to protect consumers from negligence or incompetence (i.e., malpractice insurance, review boards that handle complaints)? How are challenges to a practitioner's competency handled?

I realize that the list of questions is lengthy and that you might not already have answers to all of them. If the Committee would prefer not to address any question, please feel free to omit it. Again, I thank you and the Committee for your cooperation.

Sincerely,


Laster G. Thompson, Jr.
Deputy Director for Operations

Return To:

City/County _____

Laster G. Thompson, Jr.
 Department of Commerce
 3600 W. Broad St.
 Richmond, VA 23230

146 Responses to 305 Surveys

INTERIOR DESIGNERS SURVEY

1. AGE : 23 - 30 years old = 31.6% 30 - 50 yrs. = 56.2%
 50 - 78 yrs. = 12.3%
2. How many years experience as an Interior Designer do you have?
 1 -10 yrs. = 43.8% 10 - 30 yrs. = 41.2% 30 - 50 yrs. = 8.4%
 6.8% missing
3. Do you operate your own Interior Design business? 39.7% Yes 59.6% No
.7% Missing
 If yes, a. How many Interior Designers do you employ?
 1 - 5 = 30.1% 5 - 10 = 2.1% 67.8% missing
 b. How many Interior Decorators do you employ?
 1 - 3 = 1.4% Missing = 98.6%
4. How often do you undertake projects where overall supervision or
 assistance is not provided by a licensed design professional?
 (e.g. Architect or Engineer)
13.0% never 18.5% seldom 55.5% often 12.3% always .7% missing
5. How would you describe the frequency, on a scale of 1 - 5, of
 projects that you completed which involved:
1=never 2=rarely 3=occasionally 4=regularly 5=occasionally

	<u>1</u>	<u>2</u>	3	4	5	<u>missing</u>
a. Upgrade of hotel interiors	41.8%	21.2%	25.3%	1.4%	4.8%	5.5%
b. Upgrade of apartment buildings	54.8%	24.0%	10.3%	3.4%	2.7%	4.8%
c. Upgrade of theaters	63.0%	22.6%	8.2%	0	0	6.2%
d. Upgrade of school buildings	45.2%	19.2%	19.9%	6.2%	4.8%	4.8%
e. Upgrade of restaurants	22.6%	24.0%	30.8%	8.9%	7.5%	6.2%
f. Upgrade of office complexes	8.9%	4.8%	15.1%	20.5%	47.9%	2.7%
g. Upgrade of hospitals	32.2%	15.8%	19.2%	15.1%	12.3%	5.5%

6. Approximately how many projects did you complete in 1986?
 1 - 50 = 81.8% 50 - 350 = 13.2% 5.5% missing
7. What percentage of your total projects for 1986 were assisted or supervised? by an architect or engineer?
 1 - 25% = 28% 25 - 50% = 27.5% 50 - 100% = 19.3% 25.2% missing
8. Approximately what percentage of the total completed projects involved unassisted design of buildings for commercial use that were 1 to 2 1/2 stories high and 800 to 5000 square feet?
 1 - 50% = 39.2% 50 - 100% = 24.7% 36.3% missing
9. Approximately what percentage of your total completed designs involved the construction of interior walls, designing of electrical systems and/or placement of wiring and heating and cooling systems for:

	<u>1 - 50%</u>	<u>50 - 100%</u>	<u>Missing</u>
Hospitals	21.9%	6.2%	71.9%
Commercial Use Buildings	29.5%	39.1%	31.5%
Day Care Centers	.7%	1.4%	97.9%
Nursing Homes	7.7%	2.1%	90.4%
Municipal Buildings	14.6%	4.1%	81.5%
Theater	2.8%	.7%	96.6%
Single Family Homes	25.5%	9.8%	65.1%
Other (please list) _____			

94.5% Missing

Hotel/Motel Churches

Food Service

Retail (Auto)

10. How often do you provide the client a written contract detailing the services to be provided?
11.6% rarely 11.6% sometimes 19.9% usually 52.7% always 4.1% missing
11. How would you describe the frequency of the application of ergonomics in your practice?
6.8% rarely 12.3% sometimes 33.6% usually 43.2% always 2.1% unknown 2.1% missing
12. How would you describe your clients as to their knowledge of your individual capabilities and experience?
0 none 13.0% very little 32.9% some 37.7% a lot 15.1% extremely 1.4% missing

13. How would you describe the frequency, on a scale of 1 - 5, of inspections of your projects involving commercially used facilities by the following agencies/entities?

1 rarely 2 never 3 sometimes 4 always 5 usually

	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>missing</u>
Fire Marshall	10.3%	8.2%	13.7%	19.9%	26.7%	21.2%
Building Official	8.9%	8.9%	13.0%	18.5%	26.0%	24.7%
Health Department	20.5%	12.3%	19.9%	4.1%	6.8%	36.3%
Architects	8.2%	12.3%	33.6%	6.8%	14.4%	24.7%
Engineers	18.5%	11.6%	26.7%	4.8%	9.6%	28.8%

14. How would you describe your knowledge and understanding of the BOCA?

15.8% extremely 51.4% somewhat 21.9% very 7.5% none 3.4% missing

15. How would you describe the frequency of project assignments which require extensive reliance upon knowledge of the BOCA?

15.8% rarely 20.5% always 29.5% sometimes 18.5% usually 9.6% never 6.2% missing

16. How did you obtain your knowledge of BOCA?

37.8% self-study 0 home study course 18.9% formal instruction

17.6% other (please state) 25.6% missing

17. How did you learn interior design?

4.6% self-study 7.1% apprenticeship 58.4% college/university education 7.6% special courses 2.5% other (please list) 19.7% missing.

18. How many credit hours of education have you obtained in any of the following categories?

2.1% self study 1.7% home study 51.3% college/university education

15.1% special courses 29.8% missing

19. How was client contact established for the projects you completed in 1986? Please indicate a percentage of the total projects completed.

	<u>1 - 50%</u>	<u>50 - 100%</u>	<u>Missing</u>
By the client directly	30.8%	40.4%	28.8%
Referral by a licensed design professional	28.1%	5.5%	66.4%
Referral by another Interior Designer	15.1%	.7%	84.2%
Sub-contract	15.7%	.7%	83.6%
Response to RFP's (Requests for Proposals)	29.6%	1.4%	69.2%
Other (please specify)	13.9%	4.9%	81.5%

20. How would you describe your awareness of instances in which physical harm occurred to public employees or customers as a direct result of poor interior design?

53.4% a few 11.6% many 6.2% a lot 26.7% not aware of any 2.1% missing

21. How would you describe the increase in protection afforded the user of your services if interior designers were certified by the State?

45.2% greatly increased 39.0% increased some 10.3% no increase

3.4% could decrease 2.1% missing

22. Name five functions, currently performed by interior designers that should be performed only by designers who are certified.

Space Planning for Public Buildings

Commercial/Industrial Design

Historical Restoration

Lighting and Electrical Design

All Barrier Free Facilities/Public Facilities

Removal and/or Relocation of interior walls

Material and finishings specifications

23. Would State certification of interior designers provide the public assurance of competent and quality service from individuals so certified? 80.1% yes 11.0% no 8.9% missing

24. Do you hold any level of certification awarded by a professional organization? 71.9% yes 21.9% no 6.2% missing

If yes: a. Was it obtained by examination 55.5% yes 15.8% no 28.8% missing

b. What credential do you hold--please list.

	<u>Credential</u>	<u>No. of Hours for Exam Required</u>	<u>Awarding Organization</u>
a.	_____	_____	_____
b.	_____	_____	_____
c.	_____	_____	_____

THANK YOU FOR COMPLETING THIS SURVEY--YOUR INPUT IS IMPORTANT

APPENDIX E

Contact Person _____
 City/County _____
 Phone # (____) _____
 5 Responses to 12 Surveys

RETURN TO:
 Laster G. Thompson, Jr.
 Virginia Department of
 Commerce
 3600 West Broad St.
 Richmond, VA 23230

CONSUMER AFFAIRS SURVEY
 (Interior Design)

1. How would you describe the seriousness of problems with interior designers? (Circle the appropriate number.)

1 40% 2 60% 3 4 5
 nonexistent minor moderate severe very severe

2. How would you describe the frequency of problems with interior designers? (Circle the appropriate number.)

1 20% 2 60% 3 4 5 20%
 never rarely occasionally regularly continuously missing

3. Approximate number of complaints against interior designers over the past five (5) years. 1 response of 1 complaint

4. Check the types of complaints received:

	<u>Number of Complaints</u>	<u>Average Dollar Value</u>
() Contract term dispute	<u>1</u>	<u>0</u>
() Failure to comply with building codes	<u>0</u>	<u>0</u>
() Failure to comply with health codes	<u>0</u>	<u>0</u>
() Failure to satisfy handicap requirements	<u>0</u>	<u>0</u>
() Incompetent performance	<u>0</u>	<u>0</u>
() Poor quality of work	<u>0</u>	<u>0</u>
() False or misleading statements	<u>0</u>	<u>0</u>
() Other (Describe) _____	<u>0</u>	<u>0</u>

5. The number of investigations as a result of complaints. 1

6. The number of valid claims determined as a result of complaints. 0

7. Are there any other problem areas with interior designers that should be addressed through regulation? None Reported

THANK YOU FOR COMPLETING THIS SURVEY--YOUR INPUT IS IMPORTANT

Contact Person _____

City/County _____

Phone # (____) _____

3 responses to 4 surveys

RETURN TO:
 Laster G. Thompson, Jr.
 Virginia Department of
 Commerce
 3600 West Broad St.
 Richmond, VA 23230

BETTER BUSINESS BUREAU SURVEY
 (Interior Design)

1. How would you describe the seriousness of problems with interior designers? (Circle the appropriate number.)

1 66.7% 2 33.3% 3 4 5
 nonexistent minor moderate severe very severe

2. How would you describe the frequency of problems with interior designers?
 (Circle the appropriate number.)

1 33.3% 2 33.3% 3 4 5 33.4%
 never rarely occasionally regularly continuously missing

3. Approximate number of complaints against interior designers over the past five (5) years. 1 response of 2 complaints
 1 response of 30 complaints

4. Check the types of complaints received:

	<u>Number of Complaints</u>	<u>Average Dollar Value</u>
() Contract term dispute	<u>0</u>	<u>0</u>
() Failure to comply with building codes	<u>0</u>	<u>0</u>
() Failure to comply with health codes	<u>0</u>	<u>0</u>
() Failure to satisfy handicap requirements	<u>0</u>	<u>0</u>
() Incompetent performance	<u>0</u>	<u>0</u>
() Poor quality of work	1 response of 2 cases 1 response of 30 cases	
() False or misleading statements	<u>0</u>	<u>0</u>
() Other (Describe) _____	<u>0</u>	<u>0</u>

5. The number of investigations as a result of complaints. 1 response of 3 investigations.

6. The number of valid claims found as a result of complaints. 0

7. Are there any other problem areas with interior designers that should be addressed through regulation? None reported.

THANK YOU FOR COMPLETING THIS SURVEY--YOUR INPUT IS IMPORTANT

City/County _____

RETURN TO:
 Laster G. Thompson, Jr.
 Virginia Department of
 Commerce
 3600 West Broad St.
 Richmond, VA 23230

28 responses to 50 surveys

COMMONWEALTH ATTORNEY SURVEY
 (Interior Design)

1. How would you describe the seriousness of problems with interior designers? (Circle the appropriate number.)

1 85.7% 2 14.3% 3 4 5
 nonexistent minor moderate severe very severe

2. How would you describe the frequency of problems with interior designers? (Circle the appropriate number.)

1 82.1% 2 17.9% 3 4 5
 never rarely occasionally regularly continuously

3. Approximate number of complaints against interior designers over the past five (5) years. 1 response of 1 complaint 1 response of 2 complaints 92.8% missing.

4. Check the types of complaints received:

	<u>Number of Complaints</u>	<u>Average Dollar Value</u>
() Contract term dispute	<u>1</u>	<u>\$700</u> <u>96.4%</u> <u>missing</u>
() Failure to comply with building codes	<u>0</u>	<u>0</u>
() Failure to comply with health codes	<u>0</u>	<u>0</u>
() Failure to satisfy handicap requirements	<u>0</u>	<u>0</u>
() Incompetent performance	<u>0</u>	<u>0</u>
() Poor quality of work	<u>1</u>	<u>\$1,500</u> <u>96.4%</u> <u>missing</u>
() False or misleading statements	<u>0</u>	<u>0</u>
() Other (Describe) _____	<u>0</u>	<u>0</u>

5. The number of indictments as a result of complaints. 0

6. The number of convictions as a result of complaints. 0

7. Are there any other problem areas with interior designers that should be addressed through regulation? None reported

THANK YOU FOR COMPLETING THIS SURVEY--YOUR INPUT IS IMPORTANT

CITY/COUNTY _____
 CONTACT PERSON _____
 PHONE # () _____

Return To:
 Laster G. Thompson, Jr.
 Department of Commerce
 3600 West Broad St.
 Richmond, VA 23230

46 Responses to 48 Surveys

CITY/COUNTY ATTORNEYS QUESTIONNAIRE
 (Interior Design)

1. How would you describe the seriousness of problems with interior designers? (Circle the appropriate number.)

1	71.7%	2	26.1%	3	2.2%	4	5
nonexistent		minor		moderate		severe	very severe

2. How would you describe the frequency of problems with interior designers? (Circle the appropriate number.)

1	73.9%	2	19.6%	3	4.3%	4	5
never		rarely		occasionally		regularly	continuously

3. Approximate number of complaints against interior designers over the past five (5) years. 2 responses of 2 complaints 1 response of 15 complaints

4. Check the types of complaints received:

	<u>Number of Complaints</u>	<u>Average Dollar Value</u>
() Contract term dispute	<u>1</u>	<u>\$2,000</u>
() Failure to comply with building codes	<u>0</u>	<u>0</u>
() Failure to comply with health codes	<u>0</u>	<u>0</u>
() Failure to satisfy handicap requirements	<u>1</u>	<u>\$5,000</u>
() Incompetent performance	<u>0</u>	<u>0</u>
() Poor quality of work	<u>0</u>	<u>0</u>
() False or misleading statements	<u>0</u>	<u>0</u>
() Other (Describe) _____	<u>1</u>	<u>\$100</u>

5. The number of indictments as a result of complaints. 0

6. The number of convictions as a result of complaints. 0

7. Are there any other problem areas with interior designers that should be addressed through regulation? None reported

THANK YOU FOR COMPLETING THIS QUESTIONNAIRE--YOUR INPUT IS IMPORTANT

Contact Person _____
City/County _____
Phone #() _____

Return To:
Laster G. Thompson, Jr.
Department of Commerce
3600 W. Broad St.
Richmond, VA 23230

46 Responses to 163 Surveys

AGENCY SURVEY - BUILDING OFFICIALS
(Interior Design)

1. How would you describe problems with interior designers in you area?
(Circle the appropriate number.)

1 47.8% 2 37.0% 3 10.9% 4 2.2% 5 2.2%
nonexistent minor moderate severe very severe missing

2. How would you describe the frequency of problems with interior designers? (Circle the appropriate number.)

1 45.7% 2 32.6% 3 15.2% 4 4.3% 5
never rarely occasionally regularly continuously
2.2% missing

3. Do you feel that there is a problem with abuses by interior designers in your area?

6.5% Yes 89.1% No 4.3% Missing

4. Estimated total number of all types of inspections your agency handles each year.

1 - 1,000 = 30.5%; 1,000 - 3,000 = 21.7%; 3,000 - 6,000 = 10.9%
6,000 - 10,000 = 8.8%; Over 10,000 = 19.6% Missing = 8.7%

5. Total number of inspections of projects designed by interior designers last year.

1-100 = 43.5% 100 - 500 = 8.7% Over 500 = 2.2% Missing = 45.7%

6. Please describe the most common types of deficiencies found against projects of interior designers:

1. Failure to follow BOCA Code
2. Failure to offer barrier free interiors
3. Failure to provide adequate egress
4. Use of interior finishes which have not met flammability and toxicity tests

7. What is the approximate average dollar value of these deficiencies?

1 response \$3,000 97.8% Missing

8. How would you estimate the frequency of inspections of plans that were developed by interior designers who hold credentials issued by a professional organization? Please explain as a percentage of item #5

1 - 25% = 25.9% 25 - 100% = 6.6% 67.4% Missing

9. How would you estimate the frequency of inspection of plans developed by interior designers who do not hold credentials issued by a professional organization?

1 - 50% = 17.4% 50 - 100% = 13.1% 69.6% Missing

10. How would you describe the quality of the designs inspected which were prepared by non-credentialed interior designers to those prepared by designers with credentials.

4.3% much worse 19.6% worse 26.1% no difference 4.3% better
_____ much better 45.7% missing

11. How would you describe the frequency of rejection of plans prepared by interior designers for the following reasons? Please explain as a percentage of item #5.

Non-compliance with the BOCA:

1 - 50% = 30.3% 50 - 100% = 8.8% 60.9% missing

Unsafe materials:

1 - 25% = 15.2% 25 - 50% = 4.4% Missing 80.4%

Improper provisions for handicap access: 1 - 50% = 30.4% 50 - 100% = 4.4% 65.2% missing

Other (please list)

93.5% missing

How does this compare to your rejection rate for projects designed by an architect or engineer:

10.9% much lower 2.2% lower 13.0% no difference 26.1% higher

2.2% much higher 45.7% missing

12. Do you believe that State certification of interior designers would significantly:

	<u>Yes</u>	<u>No</u>	<u>Missing</u>
A. Improve protecting public health and safety	<u>60.9%</u>	<u>23.9%</u>	<u>15.2%</u>
B. Improve design considerations for the handicapped	<u>60.9%</u>	<u>21.7%</u>	<u>17.4%</u>
C. Provide a greater assurance of professional qualification than is provided by private professional credentialing programs	<u>60.9%</u>	<u>23.9%</u>	<u>15.2%</u>

THANK YOU FOR COMPLETING THIS SURVEY--YOUR INPUT IS IMPORTANT

City/County _____
 Phone # _____
 Contact Person _____ (Optional)

Return To:
 Laster G. Thompson, Jr.
 Department of Commerce
 3600 W. Broad St.
 Richmond, VA 23230

Number of Responses 357
 Total Sent 507

INTERIOR DESIGN-USER QUESTIONNAIRE

1. How would you describe the frequency of your use of interior designer services?

5.8% never 18.6% rarely 28.2% sometimes 11.6% often 7.2% very often
28.6% missing

2. How did you identify interior designers or interior design firms that you have done business with?

Yellow Pages 3.4%
 Personal Associations 32.6%
 By reference 34.0%
 Local advertisement 2.0%
 Bid process 8.8%
 Other (please indicate) 13.2%
 Missing 6.0%

3. How would you describe problems that you have experienced with interior designers

6.8% nonexistent 37.2% minor 18.8% moderate 2.8% severe
 _____ very severe 34.4% missing

4. How would you describe the frequency of problems with interior designers?

6.0% never 26.2% rarely 28.8% occasionally 4.6% regularly
34.4% missing

5. Have you been injured in any way as a result of poor or incompetent services by an interior designer? 5.0% yes 61.4% no 33.6% missing (If yes, please explain at the bottom of page)

6. How would you generally describe the quality of the services that you have received from interior designers? (check only one)

.6% very poor 4.4% poor 32.4% good 22.6% very good 4.6% excellent
35.4% missing

How injured:

Damaged carpet laid in Mental Health Unit resulted in inconvenience to patients and staff designer did not have knowledge of flammability standards for hospitals. Floor covering which resulted in tripping and slipping.

7. Did any of the interior designers, used by you, hold credentials or designations issued by a private professional organization?

34.2% yes 4.6% no 27.0% unknown 34.2% missing

If yes: A. Was this the primary basis for your selecting the designer or firm 5.4% yes 32.6% no 62.0% missing

8. Did any of the interior designers used by you not hold credentials or designations issued by a private professional organization?

18.8% yes 11.4% no 35.2% unknown 34.6% missing

9. If answer to #7 and #8 are yes:

B. Was the quality of services performed by credentialed Designers substantially superior to services performed by non-credentialed Designers

6.4% yes 16.4% no 77.2% missing

10. How would you describe problems that you have experienced in identifying an interior designer or firm that was qualified to perform the services for you?

17.6% nonexistent 27.6% minor 13.6% moderate 3.8% severe

0% very severe 37.4% missing

11. Do you think that certification of interior designers by the Commonwealth would:

A. Assist you in identifying qualified interior designers
33.8% yes 32.8% no 33.4% missing

B. Provide a greater assurance of qualifications than is now provided
36.4% yes 29.8% no 33.8% missing

C. Improve protecting public health and safety
29.8% yes 36.8% no 33.4% missing

D. Improve design considerations for the handicapped
27.8% yes 37.4% no 34.8% missing

12. Other comments that you wish to make:

Certification of interior designers will hardly ensure public safety. Building safety is the responsibility of building inspectors. Certification would result in increased costs of interior design services. Market forces are satisfactorily disciplining this profession.

THANK YOU FOR COMPLETING THIS QUESTIONNAIRE-YOUR INPUT IS IMPORTANT.

APPENDIX K

PUBLIC HEARING PARTICIPANTS
FAIRFAX, VIRGINIA
JUNE 10, 1987

<u>SPEAKER</u>	<u>ADDRESS</u>	<u>AFFILIATION/POSITON</u>
Gary Edwards	Vienna	Designer/Support
Ann Lambeth	McLean	Manufacturer of interior furnishings/Support
Mildred Lamm	Alexandria	Interior Design Professor/ Support
Martha Cathcart	District of Columbia	D.C. Board of Interior Design/Support
William Dornetto	Alexandria	Estomin Associates/Support
Carolyn Pulsifer	Alexandria	Alternative Design/Support
Linda Frease	Vienna	George Hyman Construction/ Support
Fred D. Meloan	Vienna	George Hyman Construction/ Support
Gerry Ward	Alexandria	Consumer/Support
Jan Delaney	Richmond	Interior Designer for a Corporation/Support
Carolyn Schebish	Vienna	Design Exchange, Inc./ Support
Mark Rubin	Richmond	Committee for Certification of Va. Int. Designers/Support (CCVID)

PUBLIC HEARING PARTICIPANTS
 RICHMOND, VIRGINIA
 JUNE 11, 1987

<u>SPEAKER</u>	<u>ADDRESS</u>	<u>AFFILIATION/POSITON</u>
Sumpter Priddy	Richmond	Va. Retail Merchants Assoc./Support
Reggie Nash	Richmond	W.W. Nash and Son (Paint Contractors)/Support
John De Moss	Richmond	Commercial consumer of services/Support
Edward L. Smith	Richmond	Hello, Inc./Support
John Braymer	Richmond	Executive Director of Va. Society of American Inst. of Architects/Oppose
Murray Steinberg	Richmond	Va. Floor Covering Assoc. recognize differences in residential vs. commercial interior design
Roberta Tingle	Richmond	Member, ASID/Oppose
John O. Campbell	Richmond	Consumer/Support
Lee Munford	Richmond	Advertising Agency/Support
Wayne Peterson	Richmond	Electrical Engineer/Support
Albert Meyer	Richmond	Acme Fixture Co./Support
James E. Grady	Richmond	Va. Realty & Dev. Co./Support
Stuart Shumate	Richmond	Engineer/Support
Buie Harwood	Richmond	Vice Pres. of NCIDQ/Support
Kay Poyner	Richmond	Interior Designer/Support
Mary Ann Sullivan	Glen Allen	Interior Designer
Emmogene Boyd	Richmond	Interior Designer/Oppose
Bill Joel	Richmond	Richmond Art Co., Inc./Support
Barbara Goodwin	Richmond	Interior Designer/Support

PUBLIC HEARING PARTICIPANTS
 ROANOKE, VIRGINIA
 JUNE 22, 1987

<u>SPEAKER</u>	<u>ADDRESS</u>	<u>AFFILIATION/POSITON</u>
Pamela Corcoran	Roanoke	Va. Citizens Consumer Council/Support other alternative before regulation
Peggy van Blaricom	Roanoke	ASID/Support
Bob Fry	Roanoke	AIA Member/Support
George Garretson	Roanoke	Library Director/Support
Lee B. Eddy	Roanoke	Engineer/Support
Judy Mills Reimer	Roanoke	Harris Office Furniture Co./Support
Dorothy Herndon	Roanoke	Consumer/Support
John McNally	Salem	Codes Inspector/Support
Benjamin Eubank	Roanoke	Painting/Wall Covering Operation/Support
Mickey Nelson	Roanoke	Member, ASID/Support
Mark Boone	Blacksburg	Student, VPI/Support
Ken Sharp	Roanoke Co.	Fire Marshal/Support
Stephen Jamison.	Roanoke	Appalachian Power Co./ Methodist District Trustee Support
Bob Parsons	Blacksburg	Educator, VPI/Support
B. Lynn Warren	Roanoke	Interior Designer/Support
Jim Hyams	Roanoke	Child Psychologist/ Consumer/Support
William E. Enyart	Roanoke	Floor Covering Business/ Support
Trenia Bell-Will	Radford	Interior Designer/Support
Steve McGraw	Roanoke	Realtor/Support
Paula Winstead	Salem	Commercial Interior Designer/Support

PUBLIC HEARING PARTICIPANTS
 NORFOLK, VIRGINIA
 JUNE 29, 1987

<u>SPEAKER</u>	<u>ADDRESS</u>	<u>AFFILIATION/POSITON</u>
Sandra Ragan	Washington, D.C.	Pres., Inst. of Business Designers/Support
Jim Story	Norfolk	Chasen Business Interiors Support
Peter Grauer	Virginia Beach	Capital Asam Wallcoverings Support
Judith Schlett	Tabb	Member, ASID/Professor Hampton Univ./Support
Miriam Shirley	Norfolk	Student, VCU/Support
James Washington	Norfolk	Architect/Support
Paul Petrie	Richmond	Chairman of Interior Design Dept., VCU/Support
Ray Jennings	Norfolk	Independent Design Firm Support
Stephen Wright	Norfolk	Architect/Support
Dennis Duff	Virginia Beach	Architect/Oppose
Richard Johnson	Chesapeake	Manufacturer of Commer. Carpet/Support
Harold Gallop	Norfolk	Goodman, Segar, Hogan, Inc./Support
Elizabeth Browne	Norfolk	Consumer/Support
Alan Hill	Norfolk	Lighting of Va./Support
Janet Kane	Richmond	Interior Designer/Support
Reeves Fowler	Norfolk	Interior Designer
Mark Rubin	Richmond	Counsel, CCVID/Support

APPENDIX L

CUMULATIVE LIST OF WRITTEN
COMMENTS SUBMITTED TO THE
BOARD OF COMMERCE
(GROUPED BY POSITION)

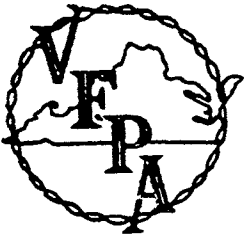
OPPOSING COMMENTS

<u>NAME</u>	<u>AFFILIATION/PROFESSION</u>
William F. Hartman	Vice Pres., Southern Home Furnishings High Point, N.C.
American Inst. of Architects	Position Paper
Roberta Tingle	Interior Designer/copy of testimony from Richmond public hearing
William W. Moseley	Va. Association of Professions' position paper, Richmond
Lucy E. Thompson	Interior Designer, Member, ASID, Arlington

SUPPORTING COMMENTS

<u>NAME</u>	<u>AFFILIATION/PROFESSION</u>
Pamela Mowbray	Mowbray Decorating Showrooms, Richmond
Lona Trebour	Monarch Interiors, Richmond
Sarah B. Jennings	National Home Fashions League, Washington, D.C.
Bill Dornetto	Estomin & Associates, Inc., Alexandria
Marjorie Johnston	Willow Oaks Country Club/House Chairman, Richmond
Murray Steinberg	President, Va. Floor Covering Assoc. Richmond
Patricia W. Stockdon	Member, ASID, Richmond
O.J. Byrnside, Jr.	Executive Director, National Business Education Association, Reston
Williams, Tazewell & Cook	Architecture-Engineering-Planning Norfolk
Susan B. Donn	Member, ASID, IBD, Norfolk
J. Nick Ware	Retired Electrical Contractor, Richmond
Paul Petrie	Position Paper
Margaret A. Beyer	Interior Designer, ASID, Richmond
William F. Causey	Attorney, Washington, D.C.
Philip L. Martin	Strategic Design Group, Richmond
William L. Lloyd, Sr.	Va. Fire Prevention Assoc., Va. Beach
Bettina D. Tudor	ASID Associate Member, Chesapeake
Allan B. Hudson, Jr.	Mount Vernon Realty, Alexandria
Frank A. Kearney	Va. Fire Services Board, Richmond

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Virginia Fire Prevention Association Inc.

"FIRE PREVENTION THROUGH EDUCATION AND PROFESSIONALISM"

October 13, 1987

George W. Logan
Board of Commerce
3600 West Broad Street
Richmond, Virginia 23230-4917

Dear Mr. Logan:

We are most concerned with the proposed Certification of Interior Designers. We addressed the Department on this issue in our correspondence of July 9, 1987. In this correspondence, we addressed several key issues.

Often, we hear that more stringent enforcement of fire and building codes is the answer to our fire problem. Where this may provide some relief, the effects would be minimal due to the following:

1. As a member of the Virginia Building and Code Officials Association, I am not aware of any building official within the Commonwealth of Virginia, that has the capability of determining the flame resistance and toxicity of smoke developed with regard to interior finish material. They must rely on the expertise and the integrity of the interior designer to initially provide documentation relating to these specifications.

2. In the Commonwealth, the Virginia Uniform Statewide Building Code supersedes all other regulations (state and local) with regard to buildings, their construction and finish, and regulations regarding use groups. The fire official has no regulatory authority until a Certificate of Occupancy has been issued by the building official. The interior finish has been completed at that point. The Statewide Fire Prevention Code which has an anticipated effective date of January 1, 1988, will not alter the fire official's authority.

3. Today, throughout the Commonwealth, the number of buildings that undergo interior design changes is astounding. Most of these changes do not require the issuance of a building permit. Therefore, the local building official does not become involved. It is

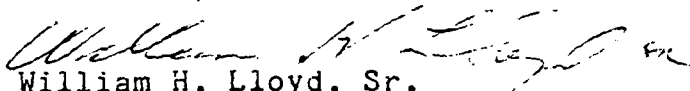
clearly left to the design professional, to interpret and to comply with the interior finish requirements necessary to provide a fire safe environment. A tremendous responsibility is placed upon the interior designer.

All too often, I have heard of instances where the interior designer was not aware of flamespread requirements, until the fire official inspected the building. As previously stated, the fire official is authorized to perform such inspection only after the Certificate of Occupancy has been issued. At that time, it is too late to determine what finish requirements should have been complied with. Who is faced with the additional cost of compliance? Who is inconvenienced by the needless delay?

The interior designer should be certified. The certification process should utilize nationally recognized standards which require the understanding of the principal elements that determine the fire hazard of a structure. Only then would those problems which relate to interior finish requirements be minimized.

Should my organization be of assistance, in the review of the proposed standards or should you desire further comment, please contact me.

Sincerely,


William H. Lloyd, Sr.
President

