

Sunrise Review of Interior Designers

Report to:
House Committee on Commerce and Labor



December 2005

TABLE OF CONTENTS

The Sunrise Review	1
• RCW 18.118	1
Executive Summary	1
Background	2
• Definition	2
• Number Of Professional Interior Designers	2-3
• Education	3
• Private Credentials	3-4
Interior Design Associations	5-7
Related Industries	7
Comments Received From Associations	7-9
Comments Received From Private Firms	9-10
Regulation in Other States	10
Survey of State Regulatory Agencies	10
Survey of States Consumer Protection Division	11
Situations in the State of Washington that Involve Interior Designers	11
Conclusion	12-13
Recommendation	13

APPENDIX

- A. Definitions of Licensure, Certification, Registration
- B. Request Letter to the Director
- C. Memorandum – AIA Washington Council
- D. International Interior Design Association – IIDA Letter
- E. NBBJ Letter to Commerce and Trade Committee on January 27, 2004
- F. NBBJ Letter to Commerce and Trade Committee on February 15, 2005
- G. NBBJ Letter to Walt Fahrer (DOL) on November 3, 2005
- H. Callison Architecture, Inc. Letter of February 15, 2005
- I. Architects & Engineers Legislative Council Letter of November 1, 2005

THE SUNRISE REVIEW

The Sunrise review process of Interior Designers was initiated by a written request from the chair of the House Commerce and Labor Committee to the director of the Department of Licensing. A thorough analysis of the issues was carried out according to the guidelines and criteria set forth in RCW.18.118.

Department of Licensing's Management Analyst Unit conducted the Sunrise Review between October and December 2005. Staff sought out issues that would indicate the need for regulation by surveying state consumer protection divisions, the Better Business Bureau, other state regulatory agencies, societies who certify or write about the industry, and professionals in the industry.

RCW 18.118

It is the intent of this chapter that no regulation shall be imposed upon any business profession except for the exclusive purpose of protecting the public interest. All proposals introduced in the legislature to regulate a business profession for the first time should be reviewed according to the following criteria. A business profession should be regulated by the state only when:

- a) Unregulated practice can clearly harm or endanger the health, safety, or welfare of the public, and the potential for the harm is easily recognizable and not remote or dependent upon tenuous argument;
- b) The public needs and can reasonably be expected to benefit from an assurance of initial and continuing professional ability; and
- c) The public cannot be effectively protected by other means in a more cost-beneficial manner.

RCW 18.118.005

The Department of Licensing, Policy and Research is responsible for conducting impartial analytical reviews of proposals for regulations of profession not currently regulated.

EXECUTIVE SUMMARY

Proponents of regulation claim consumer and public protection as rationale for regulation. Interior Designers favor regulation as a means of gaining parity as professionals with their colleagues. It is believed regulation will help assure public identification of Professional Interior Designers.

During the Sunrise Review process case histories of harm were presented to show regulation would be in the best interest of the public. In review of the National Council of Interior Design Qualifications (NCIDQ) cases of harm report the overwhelming majority of cases filed were for practicing without a license. These cases may hurt the industry but did not appear to harm the public.

Materials used and interior structural choices have impact on the way a fire may behave. In Washington State builders are required to get a building permit, submit plans and specifications reviewed for compliance and are either approved, require correction or are denied. Even so, Washington State still has structures built with less restrictive codes that were in place at the time of construction. Research did not find a fire with loss of life in Washington State that was due to code violation.

In some states choice of materials used or interior structural choices may be made by someone not professionally qualified. Codes have not been adopted in all states. A process to enforce code may not be in place. Structure may be old and built before codes were adopted. Potential public harm exists when a structure catches fire and there was no process to review plans through code requirements.

In view of the findings of the identified in sunrise review, the Department of Licensing recommends that no state licensing be required for interior designers at this time because:

- a) there is a lack of evidence the consumer is being harmed;
- b) the public can be reasonably assured of initial and continuing professional ability; and
- c) the public can effectively be protected by current statutes and codes.

BACKGROUND

Definition

According to the U.S. Department of Labor, Bureau of Labor Statistics, Interior designers enhance the function, safety, and quality of interior spaces of private homes, public buildings, and business or institutional facilities. (such as hospitals, theaters, hotels, restaurants, offices, retail establishments) Interior designers prepare drawings and specifications for non-load-bearing interior construction, furnishings, lighting, and finishes. They also design lighting and architectural details, coordinate colors, and select furniture, floor coverings, and window treatments. Interior designers must design space to conform to Federal, State, and local laws, including building codes. Designs for public areas must also meet accessibility standards for the disabled and the elderly. ([U.S. Department of Labor Bureau of Labor Statistics](#))

Commercial interior design contracts would include projects for healthcare, government, offices, hospitality, retail, or entertainment facilities. Residential projects would include the renovation or new construction of private homes. Some designers specialize in either residential or commercial projects but there are also many who do both. In addition, there are designers who specialize in specific types of interior design (for example, kitchen design)

Number of Professional Interior Designers

- The U.S. Department of Labor, Bureau of Labor Statistics reports there are roughly 60,000 interior designers employed nationwide ([U.S. Department of Labor Bureau of Labor Statistics](#)).
- More than 14,000 interior designers have passed the NCIDQ examination.

- During the second quarter of 2004, the Washington State Employment Security Department projected 1,547 interior designers employed in Washington State. ([Workforce Explorer](#))
- The Interior Design Coalition of Washington puts the estimated number of interior design professionals in Washington State at 850, with more than 60% who are members of professional interior design organizations. ([IDCWashington](#))

The Washington State Department of Revenue has 2240 active businesses coded with NAICS code of 541410 for Interior Design. (It is our belief that the businesses under this code employ interior designers and/or interior decorators)

Education

The American Society of Interior Designers estimate that 72 percent of interior designers have two or more years of higher education, 46 percent have a four-year degree, 12 percent hold an advanced degree.

Washington State higher education institutions with Interior Design programs include the following: ([Workforce Explorer Washington](#))

Higher Education Institute	Degree(s) Offered
Art Institute Of Seattle	Sum of all types
Clover Park Technical College	Associate's Degree
Highline Community College	Associate's Degree
Bellevue Community College	Associate's Degree
Spokane Falls Community College	Postsec. Awards/Cert./Diplomas; 1-2 yrs.
Spokane Falls Community College	Associate's Degree
Washington State University - Spokane	Bachelor's Degree
Washington State University - Spokane	Master's Degree
Art Institute Of Seattle	Postsec. Awards/Cert./Diplomas; 1-2 yrs.

Private Credentials

There are two national nonprofit organizations that give examinations allowing Interior Designers to become voluntarily certified in their profession. The qualifying standards for both examinations include requirements of knowledge through education and experience. The examination administered by National Council of Residential Design Qualifications (NCIDQ) is used by states that currently regulate Interior Designers. California, Illinois, and Wisconsin also use the examination administered by The Council for Qualification of Residential Interior Designers (CQRID).

CQRID—*The Council for Qualifications of Residential Interior Designers*

The Council for Qualifications of Residential Interior Designers (CQRID), require that applicants provide documentation which shows they hold or have met one of the following education and experience requirements:

- A four or five-year degree in interior design or design-related field, plus two years of practical interior design experience.
 - A three-year degree in interior design or design-related field, plus three years of practical interior design experience.
 - A two-year degree in interior design or design-related field, plus four years of practical interior design experience.
 - A high school diploma or GED, plus eight years of practical interior design experience.
- In addition, applicants could have other equivalent credentials reviewed through a special Board review.

Successful completion of the CQRID examination meets the examination requirements in three states that regulate the interior design profession (California, Illinois, and Wisconsin).

NCIDQ – *National Council of Interior Design Qualifications* –

The National Council of Interior Design Qualifications (NCIDQ), require that applicant provide documentation which shows they hold or have met one of the following education and experience requirements:

- 3520 hours of applicable experience is required when the applicant has completed a program leading to a Baccalaureate degree. Completion means not fewer than 120 semester or 180 quarter credit hours, with sixty semester or 90 quarter hours in interior design-related courses.
- 5,280 hours of applicable experience is required when the applicant has completed a program leading to a certificate, degree or diploma with no less than 60 semester or 90 quarter credit hours in interior design related coursework.
- 7,040 hours of experience is required when the applicant has completed a program leading to a certificate, degree or diploma and no less than 40 semester or 60 quarter credit hours of interior design related coursework.

Successful completion of the NCIDQ examination is a precondition for professional registration and licensure in 20 of the 24 states that regulate the interior design profession. Three states include the NCIDQ examination as one of the optional examination requirements. The state of California also requires applicants to pass a state administered examination.

INTERIOR DESIGN ASSOCIATIONS

[IDCWashington](#)--*Interior Design Coalition of Washington*

The Interior Design Coalition of Washington is a group of design professionals representing the America Society of Interior Designers, International Interior Design Association, Northwest Society of Interior Design, and independent designers across Washington State. IDCW is a unified voice that seeks to recognize the interior design profession and to protect the health, safety and welfare of the public.

In October 2005, Interior Design Coalition members of Washington met with the Department of Licensing staff to provide a review of their profession. Presented below are some of the points taken from that meeting:

- Members clarified the need for a mental shift from what most people think an interior designer is.
- Consumers need to be educated to distinguish between a professional Interior designer and one who does not meet the minimum standards.
- Members want title registration requirements in Washington State to establish enforceable standards of minimum competency, including education, experience, and examination.
- According to the interior design coalition, the national council for interior design qualifications continues to raise the standards for interior design.
- The NCIDQ Interior Design Experience Program (IDEP) closely tracks professional experience to promote the experience part of professional qualifications.
- Members pointed out Interior Designers are different from an interior decorator, kitchen and bath designers, and architects.
- According to the coalition members, Interior Designers collaborate with architects, engineers, and contractors, yet are the only profession in the grouping not registered by the state.

[IIDA](#)—*International Interior Design Association* –

The International Interior Design Association is a professional networking and educational association of more than 10,000 members in eight specialty forums, nine regions, and more than thirty chapters around the world.

[ASID](#)—*America Society of Interior Designers* –

As the oldest professional interior design association, the American Society of Interior Designers has 20,000 practicing interior designers. Four thousand members practice mainly as residential designers, and 9,500 work in both commercial and residential design. To become a professional member of ASID, interior designers must meet rigorous standards that include accredited design education and/or full-time work experience, and pass the National Council for Interior Design Qualification (NCIDQ).

The Washington State ASID Internet site contains a link that allows the public to find a qualified Interior Designer and their specialty. ([ASID Referral](#))

NWSID—Northwest Society of Interior Design)

All members of this association are required to adhere to the Code of Ethics. Professional, Associate and Apprentice members are required to complete annual continuing education units.

The different levels of membership for this association include:

Professional Designer Members—A currently active member may become *Professional Member* upon successful passage of the NCIDQ, CQRID or equivalent as required by the state in which the member resides and upon meeting one of the following:

- four years of college in an accredited interior design program, with no less than two years experience;
- two years of college, or technical school in an accredited interior design program, with no less than four years experience; or
- a secondary school level education, with no less than eight years experience.

Associate Designer Member—New applicants or qualifying *Apprentice Members* may become *Associate Designer Members* upon completing one of the following:

- Four or five years of college in an accredited interior design program with two years of design work oriented experience;
- two years of college or technical school in an accredited interior design program with four years of design work oriented experience; or
- a secondary school level education and has been actively engaged in the field of interior design for not less than the last 8 years.

Apprentice Member—A member who completed 4 years of college in an accredited interior design program, or 2 years of college or technical school in an accredited interior design program, and is working toward their work experience equivalency.

Student Member—A member enrolled in an accredited interior design school, college, or technical school program in interior design.

IIDA-northernpacific—International Interior Design Association - Northern Pacific Chapter

The International Interior Design Association (IIDA) is a worldwide association with 11,000 members who are interior designers, industry partners and students of interior design. The association upholds educational standards.

- Professional members—have fulfilled IIDA requirements for education, examination, and experience
- Associate members—have completed the educational requirements but has not taken the NCIDQ examination.
- Affiliate members—are actively engaged in a field directly related to the interior design industry.
- Student members
- Industry representatives and individuals

Professional members are required to pass the National Council of Interior Design Qualification examination (NCIDQ). Continuing education opportunities in interior design and business practice for interior designers are available at the regional and local levels and through home study. Professional and Associate Members are required to complete continuing units every two years (this requirement applies to only those who became Professional and Associate Members before January 1, 1998). In addition, the IIDA has launched an international advertising campaign that focuses on public awareness of IIDA and the importance of interior design.

RELATED INDUSTRIES

[AIA/WA](#)—*The American Institute of Architects (-Washington Council*

The American Institute of Architects is an advocacy group who represents the professional interests of architects. Their membership includes over 74,000 licensed architects, emerging professionals, and allied partners.

[AELC](#)—Architect and Engineers Legislative Council

The Architects & Engineers Legislative Council (AELC) is comprised of association and/or organizations of architects and architectural firms, engineers and engineering firms in Washington State who work cooperatively on legislative objectives and issues. The association and/or organizations include: American Council of Engineering Companies of Washington; American Institute of Architects/Washington Council; American Society of Civil Engineers; American Society of Landscape Architects; Institute of Electrical and Electronic Engineers; Land Surveyors of Washington; Structural Engineers of Washington; the Washington Society of Professional Engineers.

COMMENTS RECEIVED FROM THE ASSOCIATIONS

The International Interior Design Association (IIDA)

Below is a summary of excerpts taken from correspondence sent to the Department of Licensing by the International Interior Design Association. (IIDA letter to Walt Fahrer, Nov. 15, 2005)

The International Interior Design Association (IIDA) supports the title Act the legislation for Interior Designers because they believe it“...safeguards the health, safety and welfare of the general public, brings uniformity to the profession, defines responsibility, and encourages excellence in the interior design industry.”

American Institute of Architects, Washington Council (AIA/WA)

Below are excerpts from correspondence received by the American Institute of Architects, Washington Council.

The AIA/WA supports the desire to increase the professionalism in the interior designer profession; and would not object to a “properly structured title-only registration law.” However, they also believe the threat to public health, safety and welfare to be relatively small and view registration as the least restrictive form of regulation. In addition the AIA/WA supports established industry standards that includes a four-year professional baccalaureate degree, completion of an internship program, and passage of the complete NCIDQ examination.

The AIA/WA is concerned about the language in the interior design legislation introduced in 2005 (SHB 1878) for the following reasons.

- The AIA/WA opposes a liberal grandfather provision because they believe there should be strict limitations on any person not meeting the primary qualifications of education, experience and examination. However, the AIA supports an alternative path that requires 15 years of professional experience, including 8 years under the direct supervision of a qualified interior designer or registered architect, an Associate of Arts Degree and passage of the complete NCIDQ exam.
- The interior design regulation would expand the currently authorized scope of practice for interior designers by including the phrase “registered design professional.” This phrase is included in the state’s building code and RCW and WAC to describe the professional responsible for approving engineering and architectural construction documents and for conducting structural observation.
- The bill fails to recognize the more extensive education, experience and examination of registered architects in the same subject matters. It would require registered architects to get two additional years of education in interior design and pass another examination, even though they already provide interior design services, oversee interior designers work and train interior designers.
- Comment is in regards to language in SHB 1878—The AIS/WA would not object to a title-only registration law, provided it is properly structured, does not expand the currently legal scope of practice of interior designers, and the prerequisite qualifications meet widely accepted industry standards and such qualifications are stringent enough to ensure proper protection of the public.

Architectural firms are the top employer for interior designers and want to have highly qualified and professional staff filling these positions. Firms rely on three main criteria when selecting interior design staff: education, professional experience and (NCIDQ) examination. They are concerned about regulation that would weaken qualification standard.

Architects & Engineers Legislative Council (AELC)

Architects and Engineers Legislative Council—Excerpt taken from the letter from Clifford A. Webster, (Nov. 2005):

AELC supports efforts to raise the level of professionalism in the design professions. However, the following are specific concerns relating to recent legislative proposals to license Interior designers:

1. State mandated licensing should be enacted only when the lack of regulation of an industry or profession clearly poses a threat to the public health and safety. AELC has not seen evidence of a clearly demonstrated threat to the public health and safety from the unregulated practice of interior design.
2. Such requirements would weaken standards for determining professional qualifications by expanding interior designers' scope of practice into areas of architecture and engineering.
3. By defining interior designers as "registered design professionals" they would be allowed to coordinate, approve and present architectural and engineering documents to building officials for code approval. Fragmentation of responsibility for the building design endangers and misleads the public about respective areas of competence and expertise.

COMMENTS RECEIVED FROM PRIVATE FIRMS

[NBBJ](#)—Architectural and Interior Design firm with offices in Seattle, California, Ohio, New York, London, the United Kingdom, and Beijing.

Excerpts taken from letter received from Scott W. Wyatt, Managing Partner:

NBBJ strongly supports interior design title registration in Washington State.

The 72 interior designers who are employed with their firm work with architects, engineers and contractors on various commercial and residential projects (including high-rise office building, airports, hotels, hospitals, nursing homes).

- NBBJ believes there are critical differences between the educated, trained and certified interior designers and others practicing in the field lacking the qualifications and experience to protect the public safety and welfare.
- Completion of a qualified education in interior design, the experience of mentoring under qualified professionals, and passage of the NCIDQ exam ensures that a design professional has minimum understanding and knowledge of building and fire codes, accessibility, and barrier-free design.

(Note: The NBBJ letter included signatures from 18 interior designers who support title registration in the state.)

Callison Architecture

Excerpt taken from letter to Representative Conway, February 2005:

“Callison Architecture strongly supports the title act for Interior designers because it is vital to their industry to qualify interior designers by education, experience and examination. The results will be a higher level of assurance of the consumer/public health safety and welfare.”

REGULATION IN OTHER STATES

According to research conducted by the American Institute of Architects, (November 2004), over 18,000 Interior Designers are regulated nationwide. The 24 jurisdictions that currently regulate the Interior Design profession are:

Arkansas, California, Colorado, Connecticut, Florida, Georgia, Illinois, Iowa, Kentucky, Louisiana, Maine, Maryland, Minnesota, Missouri, Nevada, New Jersey, New Mexico, New York, Puerto Rico, Tennessee, Texas, Virginia, Washington D.C. Wisconsin. (The state of Iowa passed title only regulatory requirements in 2005)

SURVEY OF STATES REGULATORY AGENCIES

The following jurisdictions were sent surveys seeking information about current regulations, number and type of complaints, and the public benefits of regulation:

Florida, Georgia, Maine, Maryland, Michigan, Minnesota, Nevada, New Mexico, Puerto Rico, Tennessee, Texas, Virginia, and Wisconsin.

The states that responded include California, Florida, Maine, Maryland, Minnesota, Nevada and Virginia.

Of the seven who responded, Maine, Maryland, and Virginia, reported they had not received complaints in the last year. Minnesota receives an average of 3-5 complaints a year regarding interior designers who are practicing without a certificate, or practicing architecture without a license. Nevada received six complaints in the last year against unregistered individuals who held themselves out as a registered interior designer. California receives over 50 complaint regarding overcharging, non-delivery of services and incompetence—mostly against unregistered interior designers. Florida receive roughly 140 complaints a year that range from negligence, misconduct, offering services beyond the scope of licensure, and operating a business without a certificate of authorization. Florida reports that some of the unlicensed activity has resulted in great financial harm to the public.

SURVEY OF STATES CONSUMER PROTECTION DIVISION

Consumer protection agencies, in the 24 following jurisdictions, were sent a survey seeking information about current regulations, number and type of complaints, and the benefits of regulation to public:

Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Kentucky, Maryland, Michigan, Montana, New Jersey, New Mexico, Mississippi, Oklahoma, Oregon, Pennsylvania, Washington, West Virginia, Wyoming

The survey requested information on the average number of complaints received in a year, the nature of the complaint received, and whether the complaint was from the public, a corporation, or a government entity.

Of the seven states that responded to the survey, six identified that they have either received no complaints or have not risen to the level to track. New Mexico Attorney General's Office, Consumer Protection Division, reported that approximately two to three complaints a year regarding service or overcharges

The Washington State Attorney General Office, Consumer Protection Division responded that they have not received any complaints regarding interior designers.

SITUATIONS THAT MAY INVOLVE INTERIOR DESIGNERS

Cases of Harm Report, National Council for Interior Design Qualifications, Inc. ([NCIDQ](#)), October 2005

In early 2005, NCIDQ requested that its Member Boards send copies of documents related to cases in their jurisdiction where interior designers had been sanctioned or disciplined. NCIDQ specifically asked for cases that involved unlicensed practice or interior design practice beyond the scope and competency of regulated practices. Eleven cases were filed nationwide. The states involved included: Nevada (4 cases); Florida (5 cases); Minnesota (2 cases). Except for one case in Minnesota and one case in Florida, all cases filed were for "unlicensed practice".

In Minnesota, one case filed was for an attempt to secure a contract by giving something of large value as an inducement to secure employment.

In Florida, one case was filed for making deceptive, untrue, or fraudulent representations in provisions of Interior Design and Architectural Services.

National Institute of Standards and Technology (formerly National Bureau of Standards) estimates there are 12,000 fire-related deaths yearly in the United States and show:

- The first 5 to 10 minutes of a fire are the most critical.
- The first materials ignited can either contribute to the growth of the fire or prevent its spread to other areas of the building.

NFPA—National Fire Protection Association

The NFPA Fire Investigations Department documents some of the most significant fires and incidents throughout the world. The objective of these investigations and the subsequent reports that are prepared, are to discover lessons learned from these incidents.

This information is made available to the fire safety community for use in developing future codes and standards, and to adjust fire ground operations.

The NFPA research into Campus and Student Fire Safety determined several factors causing fire.

- A lack of automatic fire sprinkler systems
- Missing or disabled smoke alarms
- Careless disposal of smoking materials
- Alcohol consumption

The NFPA research into fire safety in “assembly occupancies”, defined as “an occupancy used for a gathering of 50 or more persons for deliberation, worship, entertainment, eating, drinking, amusement, awaiting transportation, or similar uses”.

NFPA publishes a number of codes and standards that work in harmony to prevent the type of life-loss fires that can occur in “assembly occupancies”.

The following elements provide an outline of the most basic requirements and criteria as found in NFPA 101 “Life Safety Code, 2000 edition that impact fires. The order in which they are presented is indicative of how they lessen a life threatening condition.

- Ignition Sources—Alcohol, pyrotechnics, open flame and cooking facilities.
- Furnishings & contents—to slow the flame spread across surfaces
- On site fire protection—fire alarm systems, automatic sprinkler systems, portable fire extinguishers.
- Exiting—occupational load, number & arrangement of exits, exit signs, emergency lighting, and posting maximum occupant load.

CONCLUSION

Whether the public is being harmed by non-regulation of interior designers is the primary concern that guided this sunrise review.

Presently, the Interior Design industry provides a good process for credentialing that includes examination, education, and experience requirements. Current evidence does not suggest the public is being harmed by non-regulation.

Washington State has strict code requirements, a plan review that provides checks and balances and a process for approval or denial. None of the incidents of fire reported were in Washington State.

Fires in other states are significant because a process to review plans and specifications did not occur or the structure was built without state code requirements. In some cases codes were not in place at the time of construction.

Based on our research, review of information gathered and criteria of law used to show public harm and the depth harm occurs, evidence was lacking.

RECOMMENDATION

In view of the findings of the sunrise review in the practice of interior designers, the following recommendations are made for consideration by the Legislature:

- a) That no state licensing of interior designers be required at this time since there was no clear evidence that the unregulated practice can clearly harm or endanger the health, safety, or welfare of the citizens of the state.
- b) The public can reasonably expect that an interior designer is a competent practitioner through certification, testing, and experience as required by professional associates.
- c) The public can be reasonably protected by mechanisms currently in place such as the Attorney General's Office, Business and Fair Practices Division.

Definitions

Licensure: “license”, “licensing”, and “Licensure” mean permission to engage in a business profession that would otherwise be unlawful in the state in the absence of the permission. A license is granted to those who meet prerequisite qualifications to perform prescribed professional tasks and for the use of a particular title.

Certification: “Certificate” and “Certification” mean a voluntary process by which a statutory regulatory entity grants recognition to an individual who has 1) met certain prerequisite qualifications specified by that regulatory entity, and 2) may assume to use “certified” in the title or designation to perform prescribed professional tasks.

Registration: “Registration” means the formal notification that, prior to rendering services, a practitioner shall submit to a state agency setting forth the name and address of the practitioner; the location, nature, and operation of the business activity to be practiced; and, if required by the regulatory entity, a description of the service to be provided.

STATE REPRESENTATIVE
29th DISTRICT
STEVE CONWAY

State of
Washington
House of
Representatives

COMMERCE & LABOR
CHAIR
FINANCE
HEALTH CARE



Liz Luce
Director, Department of Licensing
P.O. Box 9020
Olympia, Washington 98507-9020

Dear Director Luce:

Please consider this request on behalf of the House Commerce & Labor Committee to conduct a sunrise review pursuant to chapter 18.118 RCW of following two professions recently proposed for regulation in bills pending before the Legislature:

House Bill 1811, establishing licensing requirements for soil scientists.

Substitute House Bill 1878, establishing a system of registration for interior designers.

As provided in RCW 18.118.030, the sunrise review should include an evaluation of information provided by a wide range of interested parties. It is extremely important that notice of this review and the opportunity for providing information be widely disseminated among the appropriate stakeholders.

The sunrise review should also include the Department's analysis and recommendations regarding value of regulation to protect the public interest, using the factors stated in RCW 18.118.010(2).

It is my hope that your written report on these two sunrise reviews would be available to the Legislature by the start of the Legislative Session in January 2006.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steve Conway".

Steve Conway
State Representative
Chair, House Commerce & Labor Committee

cc: Sharon Whitehead
Andrea Archer
Alan Haight

MEMORANDUM

AIA Washington Council



To: Ramona Provost
Management Analyst Unit, Department of Licensing

From: Stan L. Bowman, Executive Director, AIA Washington Council
(360) 970-7513, bowman@aiawa.org

Date: November 17, 2005

Re: Architects Analysis and Comments on Proposed Interior Design Regulation

The American Institute of Architects Washington Council supports the Department of Licensing's review of recent legislation seeking to enact new restrictions on the interior design market in Washington State. AIA supports the state law (18.118 RCW) that requires any new profession or industry seeking new government restrictions first submits a detailed request to the Department documenting the need for such regulation. The state's sunrise review law provides an important impartial review of the need and extent of new regulations.

The following comments are based on a careful review of the latest version of interior design legislation (Substitute House Bill 1878) and the sunrise review statute. It is our hope that future legislation will fully address the concerns the AIA/WA has expressed over the last two years.

Executive Summary

First, and foremost, the AIA Washington Council supports the desire and need to increase the level of professionalism in the interior design profession. The AIA/WA would not object to a properly structured title-only registration law. However, our support for increasing the qualification standards in the industry must be tempered by the statutory requirement that state regulation be enacted only if the "Unregulated practice can clearly harm or endanger the health, safety, or welfare of the public, and the potential for the harm is easily recognizable and not remote or dependent upon tenuous argument" (18.118.010(2)(a) RCW). Since the threat to public health, safety and welfare is relatively small, we view registration as the least restrictive form of regulation.

Second, the AIA/WA encourages the Department to carefully review the government reports and recent court cases documenting the issue of whether there is a serious and specific threat to public health and safety. These reviews can provide an objective source of information on this topic.

Third, if the Department determines that regulation of the interior design profession is necessary, then it should recommend the least restrictive form possible: title-only registration.

Fourth, the AIA/WA supports the industry standards that have been established to determine professional qualifications for interior design professionals: a four-year professional baccalaureate degree, completion of an internship program and passage of the complete NCIDQ examination.

Fifth, the AIA/WA opposes liberal grandfathering provisions, such as those included in SHB 1878. There should be strict limitations on any person not meeting the primary qualifications of education, experience and examination. The AIA/WA supports an alternative path that requires 15 years of professional experience, including 8 years under the direct supervision of a qualified interior designer or registered architect, an Associate of Arts Degree and passage of the complete NCIDQ exam.

Sixth, the AIA/WA is concerned that the interior design regulation bill as introduced in 2005, SHB 1878, would expand the currently authorized scope of practice for interior designers by including the phrase “registered design professional.” This phrase is included in the state’s building code and RCW and WAC to describe the professional responsible for approving engineering and architectural construction documents and for conducting structural observations.

Finally, the bill fails to recognize the more extensive education, experience and examination of registered architects in the same subject matters. It would require registered architects to get two additional years of education in interior design and pass another examination, even though they already provide interior design services, oversee interior designers work and train interior designers.

Demonstrated Public Health, Life and Safety Need

As stated, the AIA/WA supports the desire of the interior design profession to elevate its professional standards and ethics by increasing industry qualification standards. It is appropriate that the Department conduct an objective and thorough review to determine if there are specific and tangible threats to the public health, safety and welfare from the unregulated practice of interior design.

The AIA/WA encourages the Department to obtain and review the many sunset and sunrise review reports conducted by other states. Some states that have conducted such reviews of the need for interior design licensure are: Colorado, Maryland, California, South Carolina and Florida. Each of these states established similar criteria to be demonstrated prior to a new registration law being enacted or a current law being extended. The Colorado Department of Regulatory Affairs’ report is particularly thorough, as they reviewed all of the states’ interior design laws for evidence that such regulation might benefit the public. Its report merits careful review.

If Regulation is Needed, Title-Only Registration is the Appropriate Level

If there is a specific threat to public health, life and property found, the next issue to be addressed (according to the sunrise review law) is what level of regulation is necessary. The AIA/WA supports the intent of the statute that the “least restrictive alternative method of regulation should be implemented.” (18.118.010(3) RCW)

The sunrise law indicates that the least restrictive form of regulation is registration:

“Where the threat to the public health, safety, or economic well-being is relatively small as a result of the operation of the business profession, the regulation should implement a system of registration...” (18.118.010(2)(c) RCW)

Registration is also referred to as a “title-only act” in which a certain title is restricted to only those who have the “prerequisite qualifications.”

In their public statements before the legislature, the interior design representatives have stated that their purpose is to differentiate persons who have met certain qualifications from those who have lesser qualifications. A registration law that only restricts a title, such as "Registered Interior Designer," would accomplish this result.

The AIA/WA would not object to a title-only registration law, provided it is properly structured, does not expand the currently legal scope of practice of interior designers, and the prerequisite qualifications meet widely accepted industry standards and such qualifications are stringent enough to ensure proper protection of the public.

There are other levels of regulation in the law that may also be considered including licensure. Given the doubts raised by many other states about the public health, life and safety need for state regulation of the interior design profession, it would not be appropriate to apply licensure restrictions on interior designers.

Under no circumstance, does the AIA/WA believe that licensure or practice restrictions, as defined in 18.118 RCW, are merited by demonstrated public needs. The volume of government reports and legal cases conclusively demonstrate that there is little public health concern and imposing such restrictive requirements could harm the industry and the public.

Industry-Based Qualification Standards

Architecture firms are the top employer for interior designers and our firms want to have highly qualified and professional staff filling these positions. To find such staff firms rely upon three main criteria: education, professional experience and examination.

When hiring professional interior designers, firms typically look for: a four-year (baccalaureate) degree from an accredited institution, completion of a structure internship and passage of the National Council for Interior Design Qualification Standards' examination.

We are concerned that the weak standards established in SHB 1878 would actually undermine current industry hiring and practice standards. The bill seeks to establish a system to differentiate qualifications. But, by adopting weak qualifications standards and using permissive grandfathering provisions, it would allow many unqualified persons to claim the same qualifications as those who are more rigorously trained.

Education

The generally accepted minimum standard for interior design education is a four-year baccalaureate degree from an accredited institution. There are two accrediting bodies that have specific standards for such degrees: the Foundation for Interior Design Education and Research (FIDER) and the National Association of Schools of Arts and Design (NASAD). The AIA has reviewed the standards of both of these bodies and have found their four-year degree programs provide effective education for professional interior designers.

However, it must be recognized that these organizations have in the past accredited or currently do accredit lesser degree programs (including 2 and 3 year degree programs). These lesser programs are

not adequate preparation for a professional interior designer and should not be considered for a standard under a government regulatory structure.

Third party accreditation of degree programs in a specific field provides important peer review of a school's curriculum and education standards. General accreditation of the college or university does not provide a content-specific review. Field-specific accreditation ensures that the content of the education program is adequate, that it is being effectively taught and students are effectively evaluated. It is vital that when an accreditation system exists for an industry or profession, that the state support that system in its regulatory structure.

In Washington State there are two programs that meet this standard. Washington State University's interior design program is FIDER accredited. The Cornish School for the Arts interior design program is NASAD accredited. These programs, along with the system of supporting community college programs, should provide an adequate supply of qualified interior designers.

By comparison, there are two accredited architecture degree programs: University of Washington and Washington State University. There are over four times as many registered architects in Washington as there are practicing interior designers, according to the data supplied by the Department to the legislature. Thus, two baccalaureate degree programs for interior designers should be more than sufficient to provide an adequate supply of practitioners to the public.

Unfortunately the weak standards in SHB 1878 would undermine the significant achievements of WSU and Cornish's programs. SHB 1878 does not establish any degree requirement, instead requiring only 2 years of undefined education that does not have to result in a degree. WSU and Cornish's efforts at excellence should be encouraged and rewarded, not undermined by statutory enactment of much weaker standards.

If new government restrictions are to be enacted, the AIA/WA recommends that the minimum education standard be a four-year professional baccalaureate degree from a university or college program accredited by FIDER or NASAD or a degree that meets comparable standards.

Professional Experience

After graduation from a four-year professional degree program, architecture firms look for interior designers who have completed a structured internship under the direct supervision of a qualified interior designer or a registered architect.

A qualified interior designer is typically seen as an interior designer that is registered under state law or certified by the NCIDQ. Since this state does not have registration, then it would initially need to rely upon training under NCIDQ certificate holders or under a registered architect. However, once a regulation system is established, there should be adequate availability of qualified interior designers and architects to provide such training.

NCIDQ had developed a structured internship program: the Interior Design Experience Program. According to NCIDQ website (www.ncidq.org), "The program provides a structure for the essential transition between formal education and professional practice, recognizing the differences between classroom and workplace. The purpose of IDEP is to develop competency in interior design practice."

It is important that there be structure to at least part of the qualifying experience requirements in a registration law. A structured program is necessary to ensure that participants are being trained in critical areas of practice. General “experience” or simple use of a title, such as interior designer, absent a structured training program is not sufficient to ensure qualifications in a field.

The AIA/WA supports the IDEP as an appropriate training requirement for those interior designers seeking state registration.

Examination

There are several national organizations that have examinations in the interior design industry. The one examination that architecture firms look for when hiring staff is passage of the one developed and offered by National Council for Interior Design Qualifications.

While this examination is used as a basis for hiring decisions, it should be noted that there are limitations to this examination as well. The exam provides a good review of non-life safety issues of interior design, but does not have an in depth coverage of critical public safety concerns. Thus, it cannot solely be relied upon for determining one’s competence to protect the public from harm. It should be used only as part of a qualifications structure that requires adequate education, professional training and examination.

The exam only recently has been based on a task or practice analysis that confirms not only what types of tasks interior designers practice, but also each task’s impact on public health, life and safety. NCIDQ reports that they completed their first practice analysis in 2003, with the 2004 exam being the first to be based on the results of their practice analysis.

There is no other interior design-specific examination that is comparable to the NCIDQ. There are other groups that offer exams in the industry, but their exams are wholly inadequate to ensure comprehensive professional qualifications.

It should also be noted that the National Council of Architecture Registration Boards’ (NCARB) Architect Registration Examination (ARE) does cover critical health, life and safety issues related to interior elements of a building. There are many persons who have passed this exam that practice interior architecture and interior design. The ARE should be treated as equal to the NCIDQ exam for purposes of state regulation.

If new government restrictions are to be enacted, then the AIA/WA recommends that the minimum examination that applicants should be required to pass is the 2004 version of the NCIDQ exam or the NCARB ARE exam.

Grandfathering

A critical flaw of SHB 1878 is that it allows persons to become registered through a permissive grandfathering clause that circumvents the necessary education, experience and examination standards.

AIA/WA does recognize that not every person will follow a traditional path to becoming a qualified interior design professional. Therefore, for a limited time frame, it may be appropriate to allow persons to become registered who have not completed a formal education program. Such persons, however,

must demonstrate extensive training under the supervision of a qualified interior designer or a registered architect.

SHB 1878 allows a person to become licensed without examination, with 15 years of *undefined* experience in interior design and two-years of education at an *unaccredited* institution. There is not even a requirement that the two-years of education result in a formal degree or certificate. Thus any person, no matter their level of demonstrated competence, could become registered under this bill provided they have used the title interior designer for 15 years. This is not an adequate standard for determining professional competence.

The AIA/WA does support the inclusion of an alternative pathway to taking the examination, including the bill's requirements of 15 years experience in professional interior design and two years of formal interior design education. To ensure the quality of training is demonstrated, at least of 8 years of that training should be under the supervision of a qualified interior designer or a registered architect. The 8 years would be roughly equal to the time a person would spend in traditional education and training program.

Moreover, applicants should be made to demonstrate that their experience has been in a comprehensive interior design practice meeting the subjects covered in an accredited interior design degree program and in the NCIDQ examination.

Finally, there should be a minimum standard of two years of formal education resulting in an Associate of Arts degree.

Undefined experience and education requirements simply provide no protection to the public.

What cannot be avoided, however, to ensure public protection, is need for applicants to pass the complete NCIDQ examination or the NCARB Architect Registration Exam. Any applicant for interior design registration must be required to pass the entire exam.

It must be cautioned that passage of the exam alone, without formal education or adequate structured experience is not adequate to ensure an applicant's professional qualifications.

Scope of Practice Definitions

The AIA/WA is concerned that recent legislation has included many practice act provisions. Especially concerning are the provisions that would expand the currently authorized scope of practice for interior designers.

SHB 1878 includes a problematic definition of registered interior designer that would greatly expand their scope of practice into area in which they are not qualified. The definition reads:

"Registered interior designer" means a person registered under this chapter who is a registered design professional qualified by education, experience, and examination. Sec. 2(2)

This definition would expand the currently authorized scope of practice for interior designers by including the phrase "registered design professional." This phrase is included in the state's building

code and RCW and WAC to describe the professional responsible for approving engineering and architectural construction documents and for conducting structural observations.

The AIA/WA supports simplifying this provision to read:

“Registered Interior designer” means a person registered under this chapter.

This is similar to the definition in the architecture statutes:

"Architect" means an individual who is registered under this chapter to practice architecture.
18.08.320(2) RCW

The phrase “registered design professional” has a very specific use in the state’s statutes and regulations governing the design and construction process. It appears to have been included in an effort to expand the currently authorized scope of practice for interior designers.

For instance, the 2003 International Building Code Section 106.1 (the code adopted by Washington) requires "construction documents shall be prepared by a registered design professional where required by the statutes of the jurisdiction in which the project is to be constructed."

In other words, a registered design professional is required to coordinate the engineering and architectural documents necessary to prove the complete safety of a building project and that the project meets the standards in the building codes. This is typically done by the prime professional on the project. Adding “registered design professional” to the interior design definition would allow “registered interior designers” to review and submit engineering and architectural documents. This is a task that requires skills and knowledge for which they are neither trained nor qualified.

51-50-1702 WAC includes the phrase when defining structural observation, “The visual observation of the structural system by a *registered design professional* for general conformance to the approved construction documents.” [Emphasis added.] Clearly, we would not want an interior designer to inadvertently claim that he or she should be doing structural observation.

Interior designers, even under the most restrictive qualification standards, are not trained nor qualified to provide such services to the public. These are areas of practice that are and should be exclusively reserved to registered architects and professional engineers. A title act should not expand any scope of practice beyond that which is allowed under the current statutory and regulatory structure.

Any legislation regulating the interior design profession should include language that specifically limits interior designers’ authority to submit construction documents to only those currently authorized in law. The bill should specifically prohibit them from coordinating and submitting documents currently required to be provided by registered architects or professional engineers. The AIA/WA proposes adding a clause to ensure there is no confusion caused by the passage of new legislation:

A registered interior designer shall not be considered a “registered design professional” as the term is used in the Revised Code of Washington, Washington Administrative Code, or State Building Code as adopted by the Washington State Building Code Council. A registered interior designer may only submit a document for building code approval if the project is exempt under 18.08.410 RCW.

Other Issues to Consider

SHB 1878 Fails to Recognize Architects' Practice of Interior Design

Another concern with SHB 1878 is that it fails to recognize the more extensive education, experience and examination of registered architects in the same subject matters. It would require registered architects to get two additional years of education in interior design and pass another examination, even though they already provide interior design services, oversee interior designers' work and train interior designers.

To become a registered architect one must have graduated with an accredited 5-year professional degree (7 years in some programs), completed a 4 to 6 year structured internship program (in which experience is tracked and documented) and passed the 41-hour Architect Registration Examination. The education, training and experience of registered architects cover all areas related to public health, safety and welfare in the practice of interior architecture and interior design. It does not make sense to require a person with such high qualifications to have additional education and pass an additional examination if they chose to use the protected title.

AIA/WA believes that licensed architects should be able to be registered by virtue of their much more rigorous licensing standards. Architects commonly provide interior design services, oversee interior designers in their practices, and train interior designers. For instance, NCIDQ requires training under a registered interior designer *or a registered* architect in their Interior Design Experience Program.

Other states that have enacted interior design restrictions allow architects to use the protected title by normally just paying the administrative fees associated with such registration. New York, for example, has such a provision in its interior design title registration law.

Ethics Clause

The AIA/WA is concerned that previous bills, including SHB 1878, have had no provision requiring the adoption of a professional ethics clause or standards of professional conduct. The other regulated professions do have ethics clauses adopted. We encourage the department to review 308.12.330 RCW, the architects' "rules of professional practice" for issues that should be addressed.

One issue that should be specifically addressed is the practice of some interior designers accepting incentive payments from their suppliers or manufacturers for specifying certain products. This is more concerning because clients are often not aware that the designer has a pecuniary interest in the products being specified.

It should be understood that we are discussing independently practicing interior designers and not those that are directly employed by manufacturers or retail outlets. Sales commissions are appropriate for sales positions, but not for an independent professional specifying products. We are also not discussing discounts that are openly shared with and passed on to the client.

We believe that along with increasing qualification standards, the interior design profession should also ensure it has a high standard of professional conduct.

Summary

In conclusion, the American Institute of Architects Washington Council supports the interior designers' efforts to elevate their professional standards. The AIA/WA would not be opposed to a properly structured and strictly limited title-only regulation.

Many states have also conducted formal sunrise or sunset reviews. These reports merit careful review and strong consideration by the Department as it prepares its report. The reviews can provide an objective source of information on this topic. The State of Colorado's sunrise review is recent and particularly thorough in its investigation of the potential threats to public health, safety and welfare from the unregulated practice of interior design.

If the state does determine to regulate the industry, then it should adopt stringent standards of qualifications and professional ethics.

The industry standards for qualifications are: a 4-year, professional baccalaureate degree from an accredited college or university, a structured internship under a qualified interior designer or a registered architect and passage of the NCIDQ Examination.

The liberal grandfathering clauses in other states have undermined the effectiveness of their regulatory efforts. The AIA/WA opposes the grandfathering of unqualified persons. At a minimum, persons that do not meet the primary qualifications for registration should have to demonstrate exacting professional experience under a qualified professional. No person should be registered without having passed the NCIDQ examination or the NCARB ARE.

Also, the bill language of SHB 1878, as last modified in 2005, is wholly inadequate to setting effective qualification standards. It would expand the currently authorized practice of interior design into area reserved solely for those with the rigorous education, training and testing of registered architects and professional engineers.

The AIA/WA is concerned with that the declining interior design registration numbers in other states is an indication of problems in their registration systems, especially the registration qualifications criteria. We would hope that Washington could avoid these pitfalls through careful scrutiny by the Department of Licensing into the reasons behind declining registration numbers

Along with higher qualifications standards, the state should also require higher standards of professional conduct. If the department recommends registration, it should recommend that a code of professional conduct be required.

Finally, the AIA/WA believes that any registration system should be sustainable if it is to be effective in protecting the public. It is important that the Department only recommend registration if we can avoid the problems exhibited in other states where permissive grandfathering and low qualification standards has undermined the effectiveness of their registration systems.

I | I D A
INTERNATIONAL
INTERIOR DESIGN
ASSOCIATION

Headquarters 222 Merchandise Mart Plaza, Suite 13-500 Chicago Illinois 60654 1104 USA TELEPHONE 312 467 1950 FACSIMILE 312 467 0779

November 15, 2005

Mr. Walt Fahrer
Department of Licensing
Office of Budget and Program Support
1125 Washington Street, SE
PO Box 9020
Olympia, WA 98507-9020

Subject: Interior Design Title Registration

Dear Mr. Fahrer:

I am writing this letter to you to express the support of the International Interior Design Association (IIDA) for the Title Act legislation that the Interior Design Coalition of Washington is proposing to insure the health, safety, and welfare of the public by authorizing the use of the title "Registered Interior Designer" for those individuals qualified by education, experience, and examination.

IIDA recognizes and supports the adoption of legislation allowing individuals conforming to standards of education, experience and examination to be registered interior designers. IIDA firmly believes that legal recognition, achieved through registration, safeguards the health, safety and welfare of the general public, brings uniformity to the profession, defines responsibility, and encourages excellence in the interior design industry.

Similar laws are already in place in 25 states including Alabama, Arkansas, California, Colorado, Connecticut, Florida, Georgia, Illinois, Iowa, Kentucky, Louisiana, Maine, Maryland, Minnesota, Missouri, Nevada, New Jersey, New Mexico, New York, Tennessee, Texas, Virginia, Wisconsin, and the District of Columbia and Puerto Rico.

In addition, 8 Canadian provinces including Alberta, British Columbia, Manitoba, New Brunswick, Nova Scotia, Ontario, Saskatchewan, and Quebec have laws defining registered interior designers as those who are qualified by education, experience, and examination to enhance the function, safety, and quality of interior spaces. These laws help to assure that Interior Design that impacts the health, safety and welfare of the public is regulated through state-established criteria.

My interest in interior design and its affect on the health, safety, and welfare of the public comes not only from my current position as a Board Member and Vice President of Government and Regulatory Affairs of IIDA, but also as a registered Interior Designer in the State of Illinois working for Solomon Cordwell Buenz In Chicago.

I am very supportive of the legislation proposing an Interior Design Title Act in Washington and want to encourage you to support it as well. Please feel free to contact me at (312) 896-1173 any time that I can be of assistance to you and the Office of Budget and Program Support.

On behalf of the members of the International Interior Design Association, not only in Washington, but across the world, I urge you and the Office of Budget and Program Support to support legislation providing for a Title Act for "Registered Interior Designers" in Washington.

Thank you for your consideration of this request.

Sincerely,



Carrie L. Fitzpatrick, IIDA
Vice President of Government and Regulatory Affairs
International Interior Design Association

January 27, 2004

Senator Joyce Mulliken
(mulliken_jo@leg.wa.gov)
and Members of the Commerce and Trade Committee
109A Newhouse Building
P.O. Box 40413
Olympia, WA 98504-0413

Subject: **House Bill HB 2513 and Senate Bill SB 6194**

Dear Senator Mulliken,

As interior designers at NBBJ (Architecture and Interior Design Firm with offices in Seattle, WA, Marina Del Rey, CA, San Francisco, CA, Columbus, OH, New York, NY, London, United Kingdom, and Beijing, PR China), and constituents of the City of Seattle district, we are writing to endorse House Bill HB 2513 and Senate Bill SB 6194 which will recognize the title of Interior Designer in this state.

Interior designers in our firm work in conjunction with architects and contractors to provide projects that meet the safety and welfare of our clients. We are advocates for interior design excellence and our designs are reflected in projects around the world. Maintaining educational standards is very important to the professionalism of our field and we strongly support HB 2513 and SB 6194.

Through title registration, the public will know that they are hiring professional, qualified interior designers to successfully execute their projects. Our firm, NBBJ, wants the public to know and understand there are critical differences between the trained, educated, and qualified interior designers and others practicing in our field that lack the pertinent qualifications and experience to protect the public's welfare and safety. Completion of a qualified education in interior design and the passage of the NCIDQ exam ensures that a design professional has the minimum understanding of knowledge, including building and fire codes, accessibility, and barrier-free design. The primary goal of this legislation is to clarify this difference to the public.

Thank you very much for your support.

Sincerely,

Rysia Suchecka, IIDA, Hon. AIA
Partner
NBBJ

February 15, 2005

Honorable Representative Steve Conway
Members of the Committee on Commerce and Labor
307 John L. O'Brien Building
PO Box 40600
Olympia, WA 98504-0600

Dear Representative Conway,

As a partner of NBBJ, I strongly support **HB 1878 & SB 5754**, which protects the title of "registered interior designer" in Washington State. This is a critical and necessary step for the profession to take in the state of Washington. Twenty-six states have already passed acts relating to interior design across the United States. These are comprised mostly of title acts and practice acts. It is important that Washington State catches up with the rest of the country and defines registered interior designers as those who are qualified by education, experience, and examination.

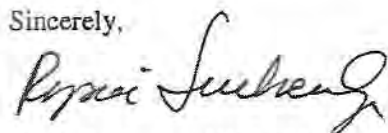
As a practicing interior designer and a partner at NBBJ, I would like to emphasize the importance of passing legislation that legally recognizes interior design in Washington State. Interior designers interpret and apply building and life safety codes, as well as barrier free parameters, on projects and practice every day. The interior designers' contribution to the built environment involves decisions that impact egress, fire separation, accessibility, and the safety of the public. This bill would make a clear distinction by qualification that would educate the consumer and protect the health, safety, and welfare of the public.

As a forward thinking firm, we fully integrate the disciplines of architecture, interior design, and engineering to deliver projects to our clients. Project types include healthcare, corporate, retail, transportation, high rise buildings, hospitality, as well as many other specialized project types. We care about what we do and how we do it. Doing the size and types of the projects that we do, we take pride with the huge responsibility to elevate the practice of design at large. We rely on highly professional, educated, and qualified interior designers to do so. It is imperative to have this **HB 1878 & SB 5754** bill passed.

Architects, interior designers, engineers, and contractors collaborate and contribute their special skills to the development and production of the built environment. However, interior design is the only profession that is not regulated by the State of Washington. Passing this legislation would promote consumer knowledge of qualified interior designers, protect the public's interest, and elevate the building profession as a whole.

Thank you for your consideration of this important initiative.

Sincerely,



Rysia Suchecka, IIDA, AIA



www.nbbj.com

November 3, 2005

Mr. Walt Fahrer
(wfahrer@dol.wa.gov)
Department of Licensing
Office of Budget and Program Support
1125 Washington St. SE
PO Box 9020
Olympia, WA 98507-9020

Subject: **Interior Design Title Registration**

Dear Mr Fahrer,

NBBJ (architecture and interior design firm with offices in Seattle, WA, Marina Del Rey, CA, San Francisco, CA, Columbus, OH, New York, NY, London, United Kingdom, and Beijing, PR China, Shanghai, China), employs 72 interior designers who work on a variety of commercial building types which include both commercial and residential projects (high rise office buildings, airports, hotels, hospitals, nursing homes etc). Interior designers in our firm work in conjunction with architects, engineers, and contractors to provide projects that meet the health, safety and welfare of our clients. The tasks and skills performed by interior designers at NBBJ may include but are not limited to:

- Research and assessment of the client's objectives and requirements
- Interpreting codes, standards, and regulations
- Incorporating ADA and accessibility standards
- Developing the building or space plan
- Selecting building finishes and materials
- Identifying safety issues
- Developing and producing project budgets
- Preparing construction documents
- Writing and compiling specifications
- Selecting furnishing, lighting and equipment

Through title registration, the public can identify professional, qualified interior designers to successfully execute their projects. Our firm, NBBJ, wants the public to know and understand there are critical differences between the educated, trained and certified interior designers and others practicing in the field that lack the qualifications and experience to protect the public's safety and welfare. Completion of a qualified education in interior design, the experience of mentoring under qualified professionals, and passage of the NCIDQ exam ensures that a design professional has minimum understanding and knowledge of building and fire codes, accessibility, and barrier-free design. The goal of this legislation is to clarify this difference to the public.



Mr. Walt Fahrer
November 3, 2005
Page 2

NBBJ is an advocate for interior design excellence. We believe in maintaining educational and professional standards and strongly support Interior Design Title Registration in Washington State.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott W. Wyatt', with a long horizontal flourish extending to the right.

Scott W. Wyatt, FAIA
Managing Partner

Attachment

Signatures from NBBJ Interior Designers in support of Interior Design Title Registration in Washington state.

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Mr. Walt Fahrer
November 3, 2005
Page 3

As interior designers and architects at NBBJ (Architecture and Interior Design Firm with offices in Seattle, WA, Marina Del Rey, CA, San Francisco, CA, Columbus, OH, New York, NY, London, United Kingdom, Beijing, PR China, and Shanghai, PR China), and constituents of the City of Seattle district, we are writing in support of Interior Design Title Registration in this state.

Signatures from NBBJ Interior Designers in support of Interior Design Title Registration in Washington state

Name

Title

Allyson M. Baker

INTERIOR DESIGNER

Anna McCune

INTERIOR DESIGNER

[Signature]

INTERIOR DESIGNER

JMA Sch

INTERIOR DESIGNER ~~MEMBER~~ - Associate

smack Oliver

interior designer

[Signature]

interior designer

Chris Jansen

INTERIOR DESIGNER

Amelia Hart

INTERIOR DESIGNER

Andreas Koffey

interior designer

[Signature]

interior designer

[Signature]

INTERIOR DESIGNER

Jane Kuyling Nyl

Interior Designer

[Signature]

INTERIOR DESIGNER

[Signature]

Resource Librarian

[Signature]

interior designer

Mr. Walt Fahrer
November 3, 2005
Page 4

Name

Casey Allan

Reyis SUCITEKA

MM

Title

Interior Designer

INTERIOR DESIGN AIA

Interior Designer



CALLISON

February 15, 2005

Honorable Representative Conway
and Members of the Commerce and Trade Committee
Washington State House of Representatives
PO Box 40600
Olympia, WA 98504

Dear Representative Conway:

Callison Architecture is a 468-person multi-discipline design firm, employing 54 interior design professionals and 206 architects.

We strongly support the Title Act for Interior Designers. It is vital to our industry to qualify Interior Designers by education, experience and examination. The results will be a higher level of assurance of the consumer/public health safety and welfare.

Callison urges you and your colleagues to vote for SB#5754/HB#1878.

Thank you for your support.

Sincerely,

Paula Stafford, IIDA
Design Principal/Board of Directors

PS:sl



Architects & Engineers Legislative Council

November 1, 2005

Ramona Provost
Department of Licensing
PO Box 9020
Olympia, WA 98507-9020

RECEIVED

NOV 03 2005

ACCOUNTING
SERVICES

Re: Interior Design Licensing

Dear Ms. Provost,

Thank you for your recent inquiry on AELC's position relative to interior design licensing. The Architects & Engineers Legislative Council (AELC) is an organization comprised of eight trade associations and professional societies representing architects, engineers, land surveyors and landscape architects in Washington State.

Chris Robertson, Chairman

Clifford Webster, Counsel

Suite 207

700 - 112th Avenue NE

Bellevue, WA 98004

Phone (425) 453-6655

Fax (425) 451-3521

www.aelc.washington.org

AELC supports efforts to raise the level of professionalism in the design professions; however the organization has specific concerns relating to the recent legislative proposals to license interior designers:

- **State mandated licensing should be enacted only when the lack of regulation of an industry or profession clearly poses a threat to the public health and safety.** AELC has not seen evidence of a clearly demonstrated threat to the public health and safety from the unregulated practice of interior design.
- **Such requirements would weaken standards for determining professional qualifications by expanding interior designers' scope of practice into areas of architecture and engineering.** By defining interior designers as "registered design professionals" they would be allowed to coordinate, approve and submit architectural and engineering documents to building officials for code approval. Fragmentation of responsibility for the building design process endangers and misleads the public as to respective areas of competence and expertise.

Thank you once again for your inquiry and do not hesitate to contact me if you need additional information.

Sincerely,

Clifford A. Webster