

May 6, 2022

House Finance Committee

email: [House.finance@akleg.gov](mailto:House.finance@akleg.gov)  
[Representative.Neal.Foster@akleg.gov](mailto:Representative.Neal.Foster@akleg.gov)  
[Representative.Kelly.Merrick@akleg.gov](mailto:Representative.Kelly.Merrick@akleg.gov)  
[Representative.Dan.Ortiz@akleg.gov](mailto:Representative.Dan.Ortiz@akleg.gov)

DD Strait Consulting, LLC  
3705 Arctic Blvd. #1348  
Anchorage, AK 99503-5774

Re: **Opposition to HB 61** REGISTER COMMERCIAL INTERIOR DESIGNERS

Dear Representatives Foster, Merrick & Ortiz,

As a licensed architect with 23 years of experience who has a small business advising building owners through design and construction of capital projects, I am writing in opposition of HB 61. Specifically because it is a Practice Act for licensing of commercial interior designers. There is already confusion among some building owners and contractors as to what professional stamps are needed for what type of work. Sometimes owners get far down a path before realizing they don't have the correct permits and drawings, or licensed professionals involved. Public awareness of existing requirements is needed around this issue, not more confusion. This proposed legislation adds confusion and would **not protect the consumer or increase public safety**. I am concerned that harm could be done because it would allow professionals who are not trained, tested for competence or required to maintain continuing education in life safety requirements to sign documents that impact a building's life safety conditions. How can someone know what they do or don't know without training, testing and continuing education related to those issues? Allowing someone to start doing something that requires established education, training and testing without them getting that education and training and being tested upon it for legal competency is counter to licensing methodology.

The proposed legislation contains terms and definitions for "commercial interior design," that do not align with current statutes that govern architecture, engineering, land surveying, and landscape architecture. Thus, it isn't clear who can sign documents for what level of renovation or type of project. If the professionals such as myself are not sure what interior designers can or cannot sign, it will only cause confusion for the public and the clients I advise. I have worked on renovation projects where interior designers performed space planning, but drawings were not coordinated with all other engineering disciplines, because that is not the typical role of an interior designer. Moving a door, cutting an opening in a wall or demolishing a wall can have structural life safety impact, but if you aren't trained or normally involved in reading structural drawings, it can and has been missed. Architects are trained for coordination of all engineering disciplines to avoid similar scenarios. Even if the issue caused by lack of coordination is not a life safety issue, it can still cause delays and construction cost increases for building owners.

I concur there are senior, highly experienced interior designers who perform many of the same tasks as architects, but they are not educated, trained, tested and required to prove current knowledge in all of the same areas of practice as architects. Just as there is different coursework for different degrees in college, there is different education, training, testing and

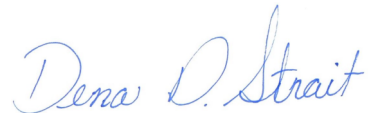
continuing education between architects and interior designers. Those differences are critical as they deal with life safety factors, which is what licensing is all about, protecting public health, safety and welfare.

Only three states in the US currently regulate the practice of interior design which are Louisiana, Nevada, and North Carolina. Florida and Michigan have both repealed the statute they had in place regulating the practice of interior design. Over half the states in the US have a statute in the form of a Title Act, which would be a better method if the state wishes to provide means for recognizing and defining well qualified interior design professionals.

I understand and concur with the backers of this bill in distinguishing themselves from others who don't share their education and training. That does protect the public and consumer. Interior designers are vital team members who are experts in many aspects of design, just not the same ones this bill would allow them authority, or the ability to sign documents, over. Therefore, I support a Title Act, but not the current Practice Act.

**Based on the above comments I urge you to hold HB 61 in committee for further analysis.**

Regards,



cc: [Representative.Liz.Snyder@akleg.gov](mailto:Representative.Liz.Snyder@akleg.gov)  
[Senator.Roger.Holland@akleg.gov](mailto:Senator.Roger.Holland@akleg.gov)

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**From:** James E. Dougherty <jdougherty@rimarchitects.com>  
**Sent:** Thursday, May 05, 2022 5:32 PM  
**To:** House Finance  
**Cc:** Rep. Thomas McKay; Sen. Natasha Von Imhof  
**Subject:** Opposition to HB 61

Members of the House Finance Committee:

Out of respect for your time, I have prepared this written testimony in lieu of speaking at hearings on HB 61, but ask that your testimony please be included in the record.

I am writing in opposition of HB 61, licensing of commercial interior designers.

My name is James Dougherty, a thirty-five-year experienced architect with offices in downtown Anchorage (RIM Architects). RIM has grown from humble Alaska beginnings to an expanded footprint in California, Hawaii, and Guam, with services offered across the nation.

I am a licensed architect in Alaska as well as (5) mountain west states, which (along with the 50 states) all have rigorous test requirements and educational and experience standards for design professionals. These credentials were hard-earned and came with a fair amount of sacrifice on my part, but I knew of the challenges and prepared accordingly.

I feel that HB61 goes a too far by granting interior designers the authority to stamp construction documents – an authority that we feel should be reserved for architects, whose more rigorous training, testing, and experience provide the most protection for the Alaskan public’s health, safety, and welfare.

Professional architects have assured that when you walk into a building, you aren’t sizing up whether you will safely come out of that building, or whether you will be trapped by fire, earthquakes, handicap accessibility, asphyxiation or collapse.

There is a name for designers who have the credential to assure that designs are safe- “**architect**”; and that role is already licensed and regulated carefully by the state.

How many of your constituents were injured as a result of the earthquake of 2018? (I’m guessing none). We tend not to think of these issues until after something terrible happens, and luckily- Alaskan architects are equipped, trained and mentored by experts. There is no shortage of these existing professionals available to take on building projects- so why this proposed legislation? What “problem” is meant to be solved by this proposal?

Thank You.

**James E. Dougherty** AIA NCARB LEED AP  
Owner | Managing Principal - Alaska



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**From:** Mark Kimerer <mkimerer@bettisworthnorth.com>  
**Sent:** Thursday, May 05, 2022 2:39 PM  
**To:** Rep. Kelly Merrick  
**Subject:** Support for HB61- Please schedule a vote!

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**BETTISWORTH**  
**NORTH**



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**From:** Michelle E. Klouda <mklouda@rimarchitects.com>  
**Sent:** Thursday, May 05, 2022 2:08 PM  
**To:** House Finance  
**Cc:** Rep. Thomas McKay  
**Subject:** HB 61, licensing of commercial interior designers OPPOSITION

Dear Representatives Foster, Merrick, Ortiz and McKay,

My name is Michelle Klouda and I am a licensed and practicing Architect in the State of Alaska. I live in District 24 and I am an owner of an Architectural firm that resides downtown at 645 G Street, Suite 400. I would like to state my opposition to HB 61.

As an architect, I have an incredible respect for interior designers and their contributions to our field. However, I feel that HB61 goes a step too far by granting interior designers the authority to stamp construction documents – an authority that I feel should be reserved for architects, whose more rigorous training, testing, and experience provide the most protection for the Alaskan’s public health, safety, and welfare.

The top two reasons for my opposition to HB 61 are as follows:

1. Interior designers do not possess comparable qualifications to architects in terms of public health, safety and welfare (HSW). They receive less than half the training in building codes and safety regulations as architects.  
*There are considerable differences in registration requirements for interior designers compared to architects. To become a licensed architect state laws have established minimum education, experience, and examinations far beyond that of a commercial interior designer. At least 22% of Architectural Registration Exams are related to building code issues which are required to pass the exams. Interior Designer’s certification criteria, through their national organization, NCIDQ, allows them to pass 2/3 of exams with a 50% score and 0 correct answers on building codes and safety.*
2. HB 61 will compromise Alaskan’s Health Safety and Welfare.  
*Architects coordinate a complex team of engineers and specialists, while overseeing a myriad of construction details, to ensure that buildings are constructed in accordance to design. Comparatively, interior designers only work on a narrow scope of a building’s design and do not have the same level of training, testing or experience to guarantee the same competence as an architect to protect public HSW. I have had experience with interior designers trying to play the role of architect or coordination project teams. Their lack of knowledge in the life safety and code aspects of architecture is apparent and they do not always understand all the parts and pieces that are required to put a building together.*

Thank you for taking time to read and take into consideration my opposition of HB 61, Licensing of commercial interior designers.

Based on the above comments I urge you to hold HB 61 in committee for further analysis.

Regards,

**Michelle E. Klouda** AIA NCARB LEED AP BD+C  
Owner | Principal



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**From:** Caitlin Cunningham [REDACTED]  
**Sent:** Thursday, May 05, 2022 1:43 PM  
**To:** Rep. Kelly Merrick  
**Subject:** HB61 Support

Dear Representative Merrick,

I am an Alaskan interior designer who supports HB61 and I hope you do too. I urge you to schedule a vote and move HB61 out of committee. Please take action now!

Thank you,

Caitlin Cunningham, Allied ASID  
[REDACTED]



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**From:** Jason Swift <jasons@ecialaska.com>  
**Sent:** Thursday, May 05, 2022 9:08 AM  
**To:** Rep. Kelly Merrick; Rep. Neal Foster; Rep. Daniel Ortiz; Rep. Bart LeBon; Rep. Bryce Edgmon; Rep. Ben Carpenter; Rep. DeLena Johnson; Rep. Adam Wool; Rep. Andy Josephson; Rep. Steve Thompson; Rep. Sara Rasmussen  
**Subject:** HB61 - Vote in Support

Dear Alaska Representatives,

I am an Alaska Architect and principal of a prominent architecture practice. HB61 strengthens the overall level of professional services in the State of Alaska and I am in full support. Commercial interior designers have a unique skillset that should be a licensed professional service. It enhances public safety and welfare. Please support HB61.

Sincerely,  
Jason

ECI

Jason Swift, AIA, Principal Architect  
(907) 565-5013 direct | (907) 444-1188 mobile  
3909 Arctic Boulevard, Suite 100, Anchorage, Alaska 99503  
[www.ecialaska.com](http://www.ecialaska.com)

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**From:** Brian Meissner <Brianm@ecialaska.com>  
**Sent:** Thursday, May 05, 2022 8:12 AM  
**To:** Rep. Kelly Merrick  
**Subject:** HB61 Letter of Support

Dear Representative Merrick,

I'm writing this letter to ask your support for HB61 Register Commercial Interior Designers.

As an Alaska architect and member of AIA Alaska, I strongly support HB61 which will allow registered commercial interior designers a license to provide what they are uniquely educated, trained and tested to do, and gives them responsibility for their own work.

This bill will improve the safety of our public buildings, especially as relates to health and wellness in commercial building interiors. I have worked closely with commercial interior designers and have seen that they provide a concentrated focus on occupant life-safety through space planning, determination of finish materials and furnishing characteristics, and content of public building interior spaces.

As a member of AIA Alaska, I disagree strongly with the position being presented by AIA Alaska. Their opposition to this bill is based on a "guild" mentality that is not relevant to the question at hand.

This bill does not impact the ability of architects, engineers, designers of single family to 4-plex residences, or designers working under a registered commercial interior designer or architect to provide their current services and scope of work.

Wishing you all the best in these days of great legislative importance,

Brian Meissner

ECI

Brian Meissner, AIA, Principal Architect

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**From:** J.B. P [REDACTED] >  
**Sent:** Wednesday, May 04, 2022 1:29 PM  
**To:** Rep. Kelly Merrick  
**Subject:** HB 61: Register Commercial Interior Designers

Dear Representative Merrick,

I support HB61! We need more design professionals in Alaska!

- HB 61 Increases the professional workforce and consumer choice for design services, entices qualified practitioners to work in Alaska, and expands business opportunities for small-business interior designers and firms.
- NCIDQ-certified commercial interior designers are qualified and prepared to protect the public through responsible, autonomous interior design practice. The ability for interior designers to independently stamp their work is already allowed in 14 states and 2 federal jurisdictions.
- Because this bill will greatly benefit Alaska residents and the state economy, please support House Bill 61.

As an Alaskan engineer, I urge you to schedule a vote and move HB61 out of committee.

Thank you,

John Pekar, P.E.  
[REDACTED] St  
Anchorage AK, 99508  
[REDACTED]

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**From:** Aretha Hayward <[REDACTED]>  
**Sent:** Saturday, May 07, 2022 9:37 AM  
**To:** House Finance  
**Subject:** Alaska Chapter of the American Institute of Architects (AIA) strongly opposes HB61  
**Attachments:** AIA Alaska ID Bill Opposition - Position Paper Mar2021 - HB61.pdf

**Alaska Chapter of the American Institute of Architects (AIA) strongly opposes HB61.** Today I want to provide you with the perspective of the AIA.

Four Primary Reasons AIA opposes HB61:

1. LACK OF REQUIREMENT for HB61--currently no HSW (Health Safety Welfare) problem exists that current statute and regulation does not address. New regulations for interior design is unnecessary.
2. RESPONSIBILITY TO THE PUBLIC--Interior designers lack adequate training to fully address HSW responsibilities to the public.
3. INCREASED PUBLIC RISK--New regulations for interior designers will cause confusion for the public, and add cost to The State of Alaska, benefiting fewer than 20 interior designers. Risk and cost to the public outweigh worth.
4. SPECIFIC LANGUAGE in HB61--There are many structural problems with the specific language.

I have attached the AIA's position paper on HB61.

Thank you, sincerely, for the work you are doing on behalf of the people of Alaska.

Aretha Cook (Hayward)  
AIA - Alaska  
Emerging Professionals Director  
C [REDACTED]

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**From:** Thomas Livingston <twlivingston@me.com>  
**Sent:** Friday, May 06, 2022 8:56 AM  
**To:** House Finance  
**Subject:** HB 61

Members of The House Finance Committee,

I am writing in opposition to HB 61, Registration for Interior Designers. Potential harm to consumers and the public is the sole basis for the government's regulation of any occupation. When regulation is deemed necessary, great lengths must be taken to ensure that the licensing board and the regulations that are created to govern the occupation focuses on consumer protection. To justify this legislation can evidence be provided to support significant and substantial harm to consumers in Alaska due to the unregulated practice of interior design?

This legislation would license a group of individuals to provide health, safety and welfare (HSW) building design services; services that are already provided by licensed architects. This creates an unnecessary duplication of licensed professionals and will cause confusion among code officials, clients and the public.

It is unclear to me how this legislation demarcates the services of an interior designer and an architect. Segregating interior design responsibilities within a building creates ambiguity in code compliance when two separate licensed design professionals are authorized for the same activity.

The proposed legislation would regulate the "practice" of interior design. Only three states in the U.S. have this type of regulation. Two other states recently repealed their statute regulating the practice of interior design.

Over half the states in the country have a statute in the form of a Title Act. A Title Act would be a better method if the Alaska wishes to provide recognition and definitions for well qualified interior design professionals.

I do not support the HB 61 legislation as proposed.

Thank you,  
Tom

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Thomas W. Livingston, FAIA Principal  
[Livingston Slone Studio @Nvision](#)  
[LivingstonSlone.com](#)

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**From:** Bruce R Berryhill <brb@gci.net>  
**Sent:** Friday, May 06, 2022 8:42 AM  
**To:** House Finance  
**Subject:** HB 61

i don't think we need to license interior designers.

Bruce R Berryhill PE SE  
B2 Engineering LLC  
25721 Berryhill Road #2  
Eagle River, Alaska 99577  
907-321-1962

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**From:** Karen Zaccaro [REDACTED]  
**Sent:** Thursday, May 05, 2022 7:46 AM  
**To:** House Finance  
**Subject:** HB 61

I am a licensed Architect and a member of AIA. I want to make clear that the position of the leadership of the local AIA chapter does not represent my opinion, nor, in my estimate, the overwhelming majority of Architects in Alaska. I have been working in Alaska for over 20 years as an Architect and in that time witnessed the value highly qualified Interior Designers bring to business clients throughout the state. I also note that several Architect colleagues have become certified as NCIDQ certified Interior Designers recently and noted that the life safety requirements are rigorous and similar to those for Architecture licensure. In fact, a few experienced Architects did not pass the Interior Design test on the first attempt.

I believe the people within my industry who oppose this bill are simply ill informed about what commercial interior designers do and what their qualifications are. I also believe if these folks think they are missing out on Architect design fees, they are wrong.

There is a need for this bill to protect the public from Interior Designers that do not have proper life safety training and to protect businesses from unnecessary Architectural fees for simple tenant improvements. Experienced and accredited Interior Designers have been doing this work for decades and it is in the public's best interest to validate their professional capacity to provide service.

thank you,  
Karen Zaccaro AIA  
[REDACTED]  
Girdwood, Alaska 99587  
[REDACTED]

May 5, 2022

Representative Neal Foster, Co-Chair  
Representative Kelly Merrick, Co-Chair  
Representative Dan Ortiz, Vice Chair  
House Finance Committee  
Representative Tom McKay, District 24

email: [House.finance@akleg.gov](mailto:House.finance@akleg.gov)  
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[Representative.Tom.McKay@akleg.gov](mailto:Representative.Tom.McKay@akleg.gov)

Re: **Opposition to HB 61 REGISTER COMMERCIAL INTERIOR DESIGNERS**

Dear Representatives Foster, Merrick, Ortiz, & McKay

I have lived in Alaska since 1991, have been a licensed architect since 1998, and personally experienced the extreme challenges of providing architectural design services in this state for nearly three decades. I have served on the board of the American Institute of Architects Alaska Chapter, including as Director, Secretary, President-Elect, President, and Past-President.

I am writing in opposition of HB 61, licensing of commercial interior designers based on the fact this bill is a **Practice Act**. There is no evidence that a **Practice Act** like this one is needed, and it may cause public confusion, and ultimately could provide public endangerment.

There are no Health, Safety, Welfare issues currently presented, making this bill an undue burden to existing registrants with no evidence of need. It will not protect the consumer or enhance public safety.

Only three states in the US currently regulate the **practice** of interior design. These states are Louisiana Nevada, and North Carolina. **Florida recently repealed their statute regulating the practice of interior design because it was deemed unnecessary.**

Over half of the states in the country have a statute in the form of a **Title Act**. Should the state wishes to provide recognition for qualified interior design professionals, a Title Act would be a more appropriate method.

The current definition of commercial interior design in HB 61 is excessively broad. The proposed legislation contains terms and definitions that do not align with current licensing and construction permitting practices in Alaska. While some interior designers choose to work within architectural offices, many practice in their own Alaskan firms, independent of other design professions. Currently, interior designers can work independently on all types of projects that do not fall *within the practice of architecture or engineering*. Some of these services include analyzing spaces, selecting furnishings, fixtures and equipment, performing field inspections of projects during construction, etc. Under HB 61,



these existing businesses will be required to become licensed interior designers. Those interior designers that do not possess the required qualifications will lose their business because this bill requires all interior designers to be licensed.

The following are excerpts from HB 61 Sec. 32, item (24), definition of Commercial Interior Design that illustrate additional concerns:

(24) "commercial interior design" means a professional service or creative work for a building the primary use of which is public occupancy, involving:

(A) analysis, research, planning, and design of the interior spaces of a building for the purpose of enhancing and protecting the health, safety, and welfare of the public by preparation of interior drawings, specifications, or other technical submissions and administration of nonstructural interior construction;

(B) design and specification of code-compliant interior finishes, furnishings, fixtures, or equipment;

(E) review, analysis, and evaluation of building codes, accessibility standards, or guidelines for interior planning, design, and nonbearing construction compliance;

The highlighted items illustrate terms that are not currently regulated and adds significant confusion. Additionally, the words commercial, public occupancy, code-compliant, internal circulation systems, suite occupant load, and more are also confusing terms that are not used in other areas of the current AELS statute. These items need to be reevaluated prior to acceptance and perhaps tighten up to exclude life safety items like occupancy loads, exiting, egress, fire walls, fire barriers, smoke barriers, etc.

In looking at interior design statutes in other states, and it is interesting to note that Michigan repealed all interior design regulation in 2014, and Florida repealed their Practice Act in 2020, making interior design a voluntary certification. The lack of clarity in this bill is subject to interpretation with no line of demarcation.

The lack of Practice act clarity will also be confusing to the public, who may not understand that hiring a licensed interior designer may not be addressing their project needs which may require the services of a licensed architect or engineer.

**Based on the above comments I urge you to hold HB 61 in committee for further analysis; and modify the legislation to a Title Act, if legislation is determined to be necessary.**

Regards,



Marcie L. Moss Errico, AIA, NCARB

*State of Alaska Architecture Registration #AELA 9682*

Studio Errico, LLC

*State of Alaska Authorized LLC Registration #AECL 1050*

May 5, 2022

Representative Neal Foster, Co-Chair  
Representative Kelly Merrick, Co-Chair  
Representative Dan Ortiz, Vice Chair  
House Finance Committee

Re: **Opposition to HB 61** REGISTER COMMERCIAL INTERIOR DESIGNERS

Dear Representatives Foster, Merrick & Ortiz,

I have lived in Alaska for over twenty years and began my career as an architect in Alaska straight out of college. As a licensed architect who has been practicing for over fifteen years now in this state, I am writing in opposition of HB 61, licensing of commercial interior designers based on the fact this bill is a Practice Act. There is no evidence presented that HB61, currently written as a Practice Act will solve a problem that currently doesn't exist. This proposed legislation is unnecessary and confusing and would not protect the consumer or increase public safety. Since there are no Health, Safety, or Welfare issues presented, this bill is an undue burden to existing registrants with no evidence that it is needed.

The proposed legislation contains terms and definitions for "commercial interior design," that do not align with current statutes that govern architecture, engineering, land surveying, and landscape architecture. This will create more confusion for the public and the AELS Board. This bill lacks clarity and is subject to interpretation with no clear understanding of what interior design covers compared to current licensed architects and engineers creating confusion to the public.

Only three states in the US currently regulate the practice of interior design which are Louisiana, Nevada, and North Carolina. Florida and Michigan have both repealed the statute they had in place regulating the practice of interior design. Over half the states in the US have a statute in the form of a Title Act, which would be a better method if the state wishes to provide means for recognizing and defining well qualified interior design professionals. There are less than 2 dozen people in Alaska who meet the requirements in this bill, therefore the costs would be spread to all current AELS registrants.

**Based on the above comments I urge you to hold HB 61 in committee for further analysis.**

Regards,



Todd Jagels, AIA, NCARB

cc: Representative Tom McKay

# HB61 – EFFECT ON ALASKAN PUBLIC HEALTH, SAFETY & WELFARE

## Does HB61 Improve Public Health, Safety & Welfare? - **NO**

Architects have successfully protected Alaskan public health, safety, and welfare (HSW) since 1949 by providing safe, code-compliant building designs. Architects coordinate a complex team of engineers and specialists, while overseeing a myriad of construction details, to ensure that buildings are constructed in accordance to design. Comparatively, interior designers only work on a narrow scope of a building's design and **do not** have the rigorous training, testing, or experience to guarantee the same competence as an architect to protect public HSW.

By licensing interior designers, HB61 will compromise the proven, public protections already in place and unnecessarily increase the risk to Alaskan's HSW. There is simply no replacement for the intense training and testing an architect receives, which often spans ten or more years through three highly-regulated developmental stages from student to licensed architect.

- 1.) Obtain a degree from an educational program accredited by the National Architectural Accrediting Board (NAAB);
- 2.) Complete on-the-job training and document experience through the Architecture Experience Program (AXP);
- 3.) Pass the Architect Registration Examination (ARE), a rigorous series of six examinations required by every US jurisdiction.

## Don't Architects Already Provide these Services? - **YES**

HB61 would create unnecessary redundancy and confusion amongst the public as to the authority and responsibility of portions of a building's design. Currently, architects successfully provide the services needed to design the interior and exterior of buildings. It would be harmful to the public as well as the practice of architecture to allow interior designers partial authority over an architect's scope. The unwanted effects of HB61 include less accountability, more confusion, more potential for mistakes and abuses, and increased complexity through unneeded regulations.

## Does HB61 Address a Public Threat/Gap in Services? - **NO**

There is no evidence to suggest a current problem or threat to the public HSW that HB61 would remedy. HB61 has not grown out of a request from the general public, nor the interior products and construction industry. There are less than two dozen people with interior design education and experience in Alaska who have requested HB61 - regulations that they believe would raise their professional standing. However, there is nothing to demonstrate a current threat to public HSW.

**Please do the right thing for Alaskans and OPPOSE HB61!**

## ARCHITECTS

- Education and training addresses the full range of public HSW building concerns, including project management and design team coordination.
- Must complete the 6-part ARE exam administered by NCARB before licensure.
- Must complete a minimum of 3,740 hrs in 6 total experience areas as part of the Architectural Experience Program (ARE) before licensure.
- Stamping responsibilities ensure that construction documents have been prepared and vetted by trusted industry experts with the highest qualifications.
- American Institute of Architects (AIA) Alaska Chapter OPPOSES HB61.

## INTERIOR DESIGNERS

- Do not possess comparable qualifications to architects in terms of public HSW building concerns.
- Lack formal construction management or project management experience.
- Have less vigorous criteria for certification from their national organization, NCIDQ.
- Stamping of plans would be redundant yet incomplete with architects' scope.
- Are not currently restricted from practicing their trade or profession.
- Are divided on wanting additional regulations and liability.

## ALASKANS

- Deserve qualified experts to stamp construction documents for buildings.
- Don't need the confusion of multi-tiered licensing regulations.
- Didn't request additional government regulations or expenses.
- Are not currently under-served or under-protected.



**AIA**  
Alaska

# HB61 – A CLOSER EXAMINATION

## Specific Concerns about HB61

AIA Alaska Chapter **opposes** HB61 on the grounds that it does not improve public HSW, splinters portions of the building designer's responsibilities and liability, leading to an increased risk to overall project coordination and success. Additionally, AIA Alaska takes issue with several specific sections of HB61, finding them ambiguous, redundant, or not in the public's best interest.

Sec. 24. AS 08.48.281 - reads that a person who is not a registered commercial interior designer is not prohibited from practicing commercial interior design if the services are performed within the scope of another professional license held by that person. As the **entire scope** of interior design is part of the scope of architecture, this shows how redundant it would be to license interior designers separately from architects.

Sec. 32. AS 08.48.341, item (24), subsections (a), (c), (d), (e) proposes changes to the Alaska Board of Registration for Architects, Engineers, and Land Surveyors (AELS). Subsection (a) contains references to "analysis, enhancing, and administration" regarding the definition of a commercial interior designer that are not referenced in the description of any other discipline mentioned in section 29, **nor are they applicable or relevant to the HSW mission of the AELS board**. There is serious ambiguity regarding concepts such as "nonstructural interior construction" or "nonstructural components." HB61 makes no mention of whom would determine whether or not a component is non-structural. Furthermore, how could an interior designer, who is not trained in structure, determine what qualifies as "non-structural" or not? Subsection (d) defines part of a commercial interior designers duties to include "number and configuration of exits for suite occupant load." AIA Alaska does not feel that interior designers are thoroughly qualified to address a building's exiting systems, which are crucial to the public's HSW.

## Negative Effects to the AELS Board

HB61 seeks to add (2) additional members to the AELS board, as well as introduce a new licenced profession which the board must license and regulate. The AELS board already faces a significant workload and HB61 does not adequately address how the additional workload, costs, and strain on the board would be mitigated, or more importantly how any discernible benefit to the public could outweigh the additional costs. Members of the AELS board have already raised concerns to HB61 sponsor Rep. Claman.

## Unintended Consequences of HB61

While HB61 seems at first glance to be a positive bill meant to empower interior designers, a more thorough understanding reveals unintended negative consequences. It is hard to imagine a scenario where a commercial interior designer with limited expertise could better protect the public HSW than an architect. Applying the "Right Touch Regulation" approach encouraged by the Alaska Department of Commerce, shows that regulating interior designers neither reduces risk to the public nor presents an appropriate use of government intervention. Additionally, fragmenting the practice of architecture with a second, partial authority creates ambiguous situations regarding liability, building design cohesion, and project management. Alaskans deserve the best protections they can get, and that means leaving State statutes alone and architects in charge of stamping construction documents.



## FINDING COMMON GROUND

Architects are problem solvers, often striving to "make everyone happy" by balancing the needs of their clients, other design professionals, contractors, and various government regulators.

In the spirit of good faith & support to our interior designer colleagues seeking increased distinction, respect, recognition, and professional standing, we support the following alternatives to an Alaska Interior Design Practice Act.

- A "Title Act" which would grant select interior designers additional distinction and recognition after meeting defined requirements, without granting stamping privileges for construction documents.
- Encouraging interior designers who want more authority to become licensed architects. There are many avenues to becoming a licensed architect, some that even substitute an accredited degree for experience (Alternative Education Path).
- Embrace the distinction of NCIDQ certification. There already exists a national organization to certify and therefore differentiate interior designers who have put in the additional time and resources to earn this distinction.

**Architecture is vital and enduring because it contains us; it describes space, space we move through, exit in and use.** - Richard Meier



**AIA**  
Alaska