

The Interior Design Response to Opponent Claims Concerning HB 61

- 1. Do Interior Designers Have Adequate Health, Safety and Welfare Education, Training and Testing to protect the public? YES.
- The Council for Interior Design Accreditation sets the standard for interior design education, addressing relevant public HSW issues, ensuring college graduates understand their role protecting building occupants, applying laws, codes, standards and guidelines to solution development throughout the design process, and teaming with other design professionals.
- The National Council for Interior Design Qualification (NCIDQ) examination for professional interior design certification similarly addresses relevant public HSW issues.
 Exam-ready candidates demonstrate application and/or understanding of federal, state/provincial, and local codes including fire and life safety, barrier-free and accessibility (ADA) regulations & guidelines for interior spaces. It is a 3-part, 11-hour National Exam including a practicum.
- To qualify for the Exam, interior designers must complete rigorous college/university interior design-specific education and between 3,520 to 5,280 hours of supervised training.
- 2. Does HB 61 Improve Public Health, Safety & Welfare? YES.
- Commercial interior designers often work directly with business or institutional clientele in public-occupancy buildings providing interior space programming, design, function and fit-out, while effectively protecting the public through application of codes, standards, and regulations.
 This bill reasonably regulates those individuals and provides professional design and guidance when full architectural services are not required.
- 3. Does HB 61 Address a Public Threat/Gap in Services? Is there really a threat to public Health, Safety, Welfare? Can the decision to specify the wrong interior materials contribute to death? YES.
- The National Fire Protection Association states the selection of public assembly interior space content is a primary determinant of whether fire accidents become tragedies, second only to fire ignition source for public life/property impact.
- Per a 12/31/2020 Report from the Virginia Board for Professional and Occupational Regulation: "The unregulated practice of interior design presents at least a moderate risk of public harm. The involvement of other regulated design professionals or building codes and inspections may not be sufficient to mitigate potential hazards to public health, safety, and welfare."
- 4. Can't interior designers be satisfied with NCIDQ Certification as a national qualification standard? NO.
- NCIDQ is not an alternative to state regulation because the organization is not a sanctioning body. Additionally, NCIDQ Certification cannot grant any additional practice rights as it does not have state regulatory power.

- 5. Does the profession/occupation require such skill that the public generally is not qualified to select a competent practitioner without some assurance that they have met minimum qualifications? YES.
- The practice of interior design is specialized and requires practitioners to demonstrate competency in areas including fire, life-safety, building and energy codes; space planning and wayfinding; interior building materials, finishes, furnishings, and equipment; lighting and acoustics; accessibility standards, ergonomics and anthropometrics; and human environmental behavior.

6. Don't Architects Already Provide Interior Design Services? NOT NECESSARILY.

- Interior designers are experts in the field, with focused education, training and examination to specifically provide occupant-centric services, while architects generally have no specific interior design coursework within their education.
- Architecture firms often employ interior designers for interior, nonstructural work due to their expertise. Architecture firms that do not have in-house interior design have been required to contract with NCIDQ-certified interior designers to complete larger projects in Alaska for military and federal agencies, in compliance with the Federal Unified Facility Criteria and Whole Building Design Guide.
- Much as nurse practitioners provide defined autonomous scopes of practice within the broader medical field, commercial interior designers with education, experience, and examination should be allowed to provide and take responsibility for their own regulated work.

7. Interior design is not a recognized design profession, is it? YES, IT IS.

- Interior Design is a recognized profession not only in 27 states/jurisdictions but also by the U.S. Federal Government per the Unified Facility Criteria (UFC), & Whole Building Design Guide (WBDG). Additionally, interior design has its own separate classification under the North American Industry Classification System (541410 Interior Design Services). The NAICS System was developed for use by Federal Statistical Agencies for the collection, analysis and publication of statistical data related to the US Economy.
- 8. Is it possible to pass 2/3 of the NCIDQ exams with a 50% score, and 0 correct answers on building codes and safety?

 NO.
- It is not possible to pass ANY of the 3 parts (NCIDQ exam) with only half the questions answered correctly. An assessment of each question on the current exam indicates it would not be possible to miss all questions pertaining to "building codes and safety" woven throughout the exam, and pass it.

SUPPORT HB 61!