

March 24, 2025

Senate Committee on Finance  
Room 532, State Capitol  
120 4<sup>th</sup> Street  
Juneau, AK 99801

RE: Considerations for Senate Bill 54

Dear Co-Chair Hoffman, Co-Chair Olson, Co-Chair Stedman, Vice Chair Merrick, and distinguished members of the Senate Finance Committee,

The National Council of Architectural Registration Boards (NCARB) thanks the Committee for the opportunity to submit testimony regarding Senate Bill 54 (SB 54). As an organization, NCARB supports the 55 U.S. licensing boards that regulate architecture by administering a national architectural exam and experience program, while promoting uniform standards and model laws. In collaboration with each state or jurisdictional licensing board, NCARB's mission is to provide prospective architects with a progressive licensing process and licensees with a streamlined mobility model, while ensuring appropriate and defensible rigor is met to protect the public health, safety, and welfare.

In acknowledging the legislative imperative to ensure the public is protected, we would like to offer some considerations specifically regarding the expansion of interior design regulations in Alaska.

**As currently drafted, it is not entirely clear whether SB 54 intends to regulate interior design as a title act or practice act.** This may lead to unintended consequences and confusion for consumers and the public. A title act would limit the regulation to the use of "registered interior designer", while a practice act would regulate the practice of interior design more broadly. As per Sec 08.48.218, SB 54 does not prohibit the practice of interior design to a person who is not registered as a "registered interior designer" if the person does not use said title. However, Sec 15 08.48.221(a) proposes to provide registered interior designers with the ability to stamp and seal documents. Stamping and sealing of documents is a responsibility that is traditionally reserved for design professionals that are licensed under a statutory practice act.

**NCARB believes a clearer distinction between an interior design title act (or a title act with permitting privileges, as we understand SB 54 proposes) and a practice act is essential to avoiding any confusion and overlapping with the responsibilities of licensed design professions in Alaska.** This clarification will reduce the potential for confusion with other design professions, building code

officials, other regulatory professionals, and the public in Alaska. Without such clarity, there is a risk for stakeholders to not fully understand the professional qualifications and the scope of work that is permitted by a registered interior designer.

NCARB supports ensuring that the regulatory framework of the Alaska State Board of Registration for Architects, Engineers, and Land Surveyors (the Board) is developed in the best interest of protecting the public in Alaska. We have long supported several state licensing boards that regulate multiple professions, like architecture and interior design, simultaneously.

Effective interior design regulation includes important statutory provisions that NCARB fully supports. These key provisions include defining a scope of practice, clearly differentiating between a title and practice act, requiring interior designers to meet rigorous qualifications, and ensuring continuing education requirements are met for registration renewal. The statutory framework, as amended in SB 54, should be clear and unambiguous to avoid confusion and any future unintended consequences. **While we recognize the value and importance of the regulation of interior design, we highly encourage the Committee to further discuss the proposed interior design language to ensure it establishes the goal of reasonable regulations that protect the public.**

We are thankful for your consideration in this matter. If you have any questions, comments, or concerns, please do not hesitate to contact my designated point of contact Maurice Brown, NCARB's Assistant Vice President of Advocacy and External Engagement at [MBrown@ncarb.org](mailto:MBrown@ncarb.org).

Respectfully,



Michael J. Armstrong  
National Council of Architectural Registration Boards  
Chief Executive Officer