

January 18, 2024

Alaska House Labor and Commerce Committee

email: House.Labor.And.Commerce@akleg.gov; Representative.Jesse.Sumner@akleg.gov;
Representative.Justin.Ruffridge@akleg.gov; Representative.Mike.Prax@akleg.gov;
Representative.Dan.Saddler@akleg.gov; Representative.Stanley.Wright@akleg.gov;
Representative.Ashley.Carrick@akleg.gov; Representative.Zack.Fields@akleg.gov;

Re: OPPOSITION to HB 159 An act to register Interior Designers and Interior Design

Dear Chair Sumner and members of the House Labor & Commerce Committee,

I am writing to express my earnest OPPOSITION to House Bill 159.

As a licensed architect who has worked closely throughout the state with building owners and builders, I have a firm grasp of the harmful impact this bill would have on our design and construction industries.

I have served as the President of the American Institute of Architects (AIA) Alaska Chapter and currently represent Alaska on the AIA National Strategic Council. I am also an active Licensing Advisor for the National Council of Architectural Registration Boards (NCARB). These roles allow me the opportunity to work with design professionals from around the country, access research done by NCARB and AIA on this topic, and analyze how other jurisdictions have responded to the question of interior design regulation.

Based on reviewing the information available, it is evident to me that HB 159 is an attempt to use Alaska as a testing ground to advance the special interests of the national level organization that issues the specific exams and certificates required by this bill. It is no surprise that they are so deeply invested in finding a foothold by promoting this legislation.

No other state or jurisdiction in the country regulates such a far-reaching scope of interior design practice or goes as far to restrict the freedoms of building owners, contractors, tenants, and designers to renovate interior spaces. This bill would drastically reduce everyone's options for accomplishing simple interior updates by requiring a license from one of about twenty people, many of whom you have undoubtedly already heard advocating for this bill. Supporters of this bill tend to have at least one thing in common - they or their business interests will benefit in a restricted market.

To be clear, I have no underlying disagreement with the practice of regulating professions and business in the best interest of the community. In building design, we commonly refer to this as protecting the health, safety, and welfare of the public. While we do have the occasional roof collapse from snow or fire in a building, what we do not have in Alaska is a gap in our current regulation related to interior design currently putting the public at risk. HB 159 simply isn't responding to a need for improved safety, there is no problem to solve.

I urge you to protect local building owners, contractors, designers, and regulators from being part of an outside special interest experiment.

Please OPPOSE House Bill 159 and feel welcome to reach out if you would like more information.

Sincerely,



Ryan N Morse, AIA, NCARB

cc: AIA Lobbyist dianneblumer@gmail.com

Date: January 24, 2024

Email: House.Labor.And.Commerce@akleg.gov
Representative.Jesse.Sumner@akleg.gov
Representative.Justin.Ruffridge@akleg.gov
Representative.Mike.Prax@akleg.gov
Representative.Dan.Saddler@akleg.gov
Representative.Stanley.Wright@akleg.gov
Representative.Ashley.Carrick@akleg.gov
Representative.Zack.Fields@akleg.gov

Re: Opposition to HB 159 REGISTER INTERIOR DESIGNERS

Dear House Labor and Commerce Members,

As Registered Architect in the State of Alaska for the past 29 years, and former AELS Chair/Board Member, I am writing to ask that you do not support the passage of HB 159: An Act relating to registered interior designers and interior design.

- There is no evidence presented that HB 159 will solve a problem that at this time does not exist.
- This proposed legislation is unnecessary and confusing and would **not protect the consumer or increase public safety**.
- I do not believe that current regulation of building design and engineering should be changed, the existing restricted scope of work for architects and engineers should remain as they are.
- I oppose the cost of Interior Design regulation being passed on to existing licensees. I support a regulation fee structure that is borne by the affected Interior Design licensees.

Based on the above comments I urge you to **OPPOSE** the passage of House Bill 159.

Respectfully yours,



Richard R. Rearick, AIA, NCARB

cc: Representative.Jamie.Allard@akleg.gov

AIA Lobbyist: dianneblumer@gmail.com

Date: January 18, 2024

House Labor & Commerce Committee
Representative Jesse Sumner, Chair
Representative Justin Ruffridge, Vice Chair
Representative Mike Prax
Representative Dan Saddler
Representative Stanley Wright
Representative Ashley Carrick
Representative Zack Fields,

Email: House.Labor.And.Commerce@akleg.gov
Representative.Jesse.Sumner@akleg.gov
Representative.Justin.Ruffridge@akleg.gov
Representative.Mike.Prax@akleg.gov
Representative.Dan.Saddler@akleg.gov
Representative.Stanley.Wright@akleg.gov
Representative.Ashley.Carrick@akleg.gov
Representative.Zack.Fields@akleg.gov

Re: **OPPOSE HB 159: REGISTRATION OF INTERIOR DESIGNERS**

Dear House Labor and Commerce Members,

As a constituent of Representative Jesse Sumner, as an AIA Alaska Member and a Registered Architect in the State of Alaska for the past 15 years, I am writing to ask that you **do not support** the passage of HB 159: An Act relating to registered interior designers and interior design. Like many Alaskan members of the American Institute of Architects (AIA), as well as our colleagues in engineering and construction, I am opposed to HB159 because it is unnecessary, redundant, and most importantly, may negatively affect public health, safety, and welfare for the following reasons:

- **Overlap of services:** The definition of interior design is too far-reaching (ref Sec 32 of the bill), and it creates an overlap of services rendered by engineers and architects who already practice these services, causing confusion for the public and unnecessary costs for State enforcement.
- **Liability and responsibility:** It will create further confusion for the public and for construction contractors with regards to liability and responsibility because of the lack of understanding of what interior design is, and is not.

- **Unqualified persons:** It injects potentially unqualified persons into a structured regulatory framework wherein the State will risk critical health and safety issues to be determined by unqualified persons. State licensed architects and engineers have significantly more rigorous education, training, and testing than interior designers.
- **Does not increase public safety:** The proposed legislation is unnecessary and confusing and would not protect the consumer or increase public safety. It will restrict people from practicing interior design as they are currently free to do; this is a special interest bill that benefits a very small number of Alaskans.

There is no evidence presented that HB 159 will solve a problem that at this time does not exist. Based on the above comments I urge you to **OPPOSE** the passage of House Bill 159.

Respectfully,



Ramona Schimsheimer, AIA, PMP
Principal Architect | Project Manager
ASRC Consulting & Environmental Services, LLC.
3900 C Street, Suite 701
Anchorage, AK 99503

Residence: 6131 Austria Drive, Anchorage AK 99516; rschimsheimer@gmail.com

Copy: District 28 Representative Jesse Sumner, Chair
AIA Lobbyist: Diane Blumer

Date: January 24, 2024

Email: House.Labor.And.Commerce@akleg.gov
Representative.Jesse.Sumner@akleg.gov
Representative.Justin.Ruffridge@akleg.gov
Representative.Mike.Prax@akleg.gov
Representative.Dan.Saddler@akleg.gov
Representative.Stanley.Wright@akleg.gov
Representative.Ashley.Carrick@akleg.gov
Representative.Zack.Fields@akleg.gov

Re: Opposition to HB 159 REGISTER INTERIOR DESIGNERS

Dear House Labor and Commerce Members,

As an AIA Alaska Member, a person in the architectural profession for over 15 years and a Registered Architect in the State of Alaska for the past 7 years, I am writing to ask that you do not support the passage of HB 159: An Act relating to registered interior designers and interior design.

- There is no evidence presented that HB 159 will solve a problem that at this time does not exist.
- This proposed legislation is unnecessary and confusing and would **not protect the consumer or increase public safety**.
- I do not believe that current regulation of building design and engineering should be changed, the existing restricted scope of work for architects and engineers should remain as they are.
- I oppose the cost of Interior Design regulation being passed on to existing licensees. I support a regulation fee structure that is borne by the affected Interior Design licensees.

Questions I ask myself as I evaluate and weigh this legislation are: Would this provide barriers to people doing minor interior tenant improvements that do not require the services of a licensed Architect? Will these tenant improvements now require some form of regulation thus requiring more cost to building owners and tenants? Where do we draw the line between projects that require a Licensed Architect and a Registered Interior Designer?

Based on the above comments I urge you to **OPPOSE** the passage of House Bill 159. **While this letter is in opposition, I am not opposed to coming to some solution that elevates registered interior designers with an NCIDQ registration.**

Respectfully yours,



Michelle Klouda, AIA NCARB, F.SAME, LEED AP BD+C

cc: Representative Tom McKay, rep.thomas.mckay@akleg.gov
AIA Lobbyist: dianneblumer@gmail.com

Date: January 19, 2024

Email: House.Labor.And.Commerce@akleg.gov
Representative.Jesse.Sumner@akleg.gov
Representative.Justin.Ruffridge@akleg.gov
Representative.Mike.Prax@akleg.gov
Representative.Dan.Saddler@akleg.gov
Representative.Stanley.Wright@akleg.gov
Representative.Ashley.Carrick@akleg.gov
Representative.Zack.Fields@akleg.gov

Re: **Opposition to HB 159 REGISTER INTERIOR DESIGNERS**

Dear House Labor and Commerce Members,

As an Alaska Resident who works in the custom home industry the past 50 years, I am writing to ask that you do not support the passage of HB 159: An Act relating to registered interior designers and interior design.

- There is no evidence presented that HB 159 will solve a problem that at this time does not exist.
- This proposed legislation is unnecessary and confusing and would **not protect the consumer or increase public safety**.
- I do not believe that current regulation of building design and engineering should be changed, the existing restricted scope of work for architects and engineers should remain as they are.
- I oppose the cost of Interior Design regulation being passed on to existing licensees. I support a regulation fee structure that is borne by the affected Interior Design licensees.

Based on the above comments I urge you to **OPPOSE** the passage of House Bill 159.

Respectfully yours,

N. Claiborne Porter Jr. AIA, NCARB

cc: representative.alyse@akleg.gov
AIA Lobbyist: dianneblumer@gmail.com

Dear House Labor and Commerce Members,

As a Registered Architect in the State of Alaska for the past 48 years, I am writing to ask that you do not support the passage of HB 159: An Act relating to registered interior designers and interior design.

There is no evidence presented that HB 159 will solve a problem that at this time does not exist.

The proposed legislation is unnecessary and confusing and would not protect the consumer or increase public safety.

Current regulation of building design and engineering should not be changed, the existing restricted scope of work for architects and engineers should remain as they are.

I oppose the cost of Interior Design regulation being passed on to existing licensees. I support a regulation fee structure that is borne by the affected Interior Design licensees.

Based on the above comments I urge you to oppose the passage of House Bill 159.

|

Respectfully yours,

Tom

Thomas W. Livingston, FAIA
Principal

Livingston Slone Studio
@Nvision

Subject: HB159, Register Interior Designers, Public Testimony

**** WARNING:** Sender is not part of your organization. Think carefully before clicking links, opening attachments, or sending a reply. **

Dear House Labor & Commerce Committee of the Alaska Legislature:

I submit the following public testimony in advance of the hearing currently scheduled for HB159 on Monday, January 22, 2024 at 3:15PM. I am opposed to both HB159 and its companion bill SB73.

As I understand, based on my recollection of related testimony on SB73, specific circumstances driving the sponsors' perceived need for HB159 relate to an instance or multiple instances in which at least one of Alaska's interior design professionals may have been judged as individually or collectively lacking specified credentials necessary for participating in one or more federal design contract. Based on this prior testimony on SB73, I urge the House Labor & Commerce Committee of the Alaska legislature to consider the following before passing HB159 out of committee.

Specifically, the subject requirement is the need to be a "registered" interior designer as a condition of providing professional interior design services on federal contracts.

Upon becoming aware of the subject requirement, either as a condition of submitting a proposal or participating in the design work, what was the interior designer's response? What actions did the interior designer(s) take to remedy the issue with the federal agency, if any? What additional information and considerations can be gleaned from the outcomes of those actions?

Did the interior designer(s) seek clarification from the federal agency? If not, why not? If yes, what was the federal agency's complete response?

Does the federal agency retrospectively consider the subject requirement an error? If so, it may be helpful to understand how the error appeared in the request for proposal. Is the subject requirement part of a federal boiler plate template for similar contracts? Did the subject requirement fail to be eliminated from a contract borrowed from a similar federal project in another state that was hurriedly modified for an Alaska project(s)? Did a lone project manager independently take the initiative to include the subject requirement in a contract(s) without the knowledge or approval of agency leadership?

If the federal agency does not retrospectively consider the requirement to be an error, did the federal agency's region, district or division recently make this requirement as a matter of policy? What documentation is available to support such a decision? To what degree has a thorough review of this documentation informed the voting decisions of the House Labor and Commerce Committee?

Can any federal agency justify any requirement for professional registration of any kind as a condition of providing professional services on its federal contracts? If so, what is the basis of that justification? Is the power to require professional registration or administer professional licensing a federal power enumerated in the U.S. Constitution? How might the Supreme Court's imminent decision on Chevron and Deference impact the committee's opinions on HB159 both now and in the future following the supreme court's imminent ruling? Does Legislative Legal have any input to offer which might help clarify how the Supreme Court's ruling on Chevron and Deference could potentially impact professional licensing requirements and the costs thereof?

For now, would it be reasonable to interpret the subject requirement such that "registration" as a condition of satisfying the federal contract requirement is only required to the extent that

administrative means to register in the state where the professional services are to be provided exist? If so, SB73 and HB159 are clearly unnecessary.

Is it reasonable for the State of Alaska and Alaskans to incur burdens in association with the subject requirement? Burdens include the fact that professional licensing is widely recognized by small businesses and the working public as a barrier to work. Registration, and especially additive and incremental increases in registration administration needs when federally specified, expands the cost and size of state government. Depending on the whimsical interpretations of successive federal administrations, these fiscal impacts are inconsistently recognized and absorbed by states as unfunded federal mandates. If you do not agree, please advise, to what degree is the administrative burden of state licensing funded by the federal government?

On a state level, the perceived need and degree to which a profession should be regulated is an unfortunate and recent administrative practice. Wyoming may have been the first state to require engineers and surveyors to register in 1907. Professional registration of any kind is not a normal historical practice in the United States. Serious consideration should be given to eliminating the practice of it altogether. What is there to rely upon in the absence of the government's professional registration, you ask? It is the efficient, effective, and irreplaceable application of individual human judgement. Among other information, professionals and their patrons may continue to rely upon consideration of professionals' reputations and credentials including references, education, training, and experience. These criterium also happen to be the substantial basis of evaluation for professional proposals already.

Professional architects, registered interior designers, and conventional interior designers may debate the finer details of where there is or isn't cross-over and overlap in their professions. As an interior design lay person, the scope of interior design rouses no direct connection whatsoever with public safety. Interior design is artistic in nature. Making a direct connection between public safety and a profession that is inherently artistic is a trait most commonly associated with totalitarian regimes. Interior design is drapery, pillow cushions, and area rugs. Interior design is not a profession that rises to the threshold of what has only been recently recognized as one the government must regulate. Interior design is simply lipstick on the pig.

I urge the House Labor & Commerce Committee of the Alaska legislature to carefully consider these points and additional information before passing HB159 out of committee.

Sincerely,

Lucas Smith

Dear Representatives ,

I provide interior design services and been in the business for 28 years. I do not have NCIDQ certification, so I will be negatively affected by HB 159.

I work with the general public, as well as with other interior designers and architects. I value the relationships that I have developed with all of my customers and industry partners. While I appreciate the advanced training that some interior designers get through NCIDQ certification, I believe the market should remain open to a wide variety of people who practice different aspects of interior design.

By designating interior design as a registered practice, I will no longer be able to assist any of my customers who do not fall within the exemptions that are outlined in the bill. I will not be able to help a bank design a new look for their lobby, or provide an owner with design ideas for making their office layout more efficient. **This bill would take away my clients choice to continue our longstanding working relationships. Continuing those relationships and work that I currently provide, as I have for years, would become a crime that could result in a fine of up to \$10,000 or 1 year of jail time . It is unfathomable to me that furnishing a lobby or making esthetic improvements to a space could become a crime punishable by law .**

I am not aware of any current problems within Alaska's design and construction industry that require interior designers to become registered. This proposed legislation is unnecessary and confusing. It will limit and restrict consumer choices. It will create unnecessary regulation in Alaska.

I respectfully request that you **OPPOSE HB 159** and allow me to continue the good work that I have provided for the past 28 years.

Sincerely.

Elke Mazzeo
4633 Jumar Ave .
Anchorage , AK 99516

January 18, 2024

Alaska House Labor and Commerce Committee
email: House.Labor.And.Commerce@akleg.gov
Representative.Jesse.Sumner@akleg.gov
Representative.Justin.Ruffridge@akleg.gov
Representative.Mike.Prax@akleg.gov
Representative.Dan.Saddler@akleg.gov
Representative.Stanley.Wright@akleg.gov
Representative.Ashley.Carrick@akleg.gov
Representative.Zack.Fields@akleg.gov

Re: **OPPOSITION to HB 159** An act to register Interior Designers and Interior Design

Dear Chair Sumner and members of the House Labor & Commerce Committee,

I am a lifelong Alaskan and licensed architect who has been practicing for over thirty years in this state. I am currently the President for the American Institute of Architects Alaska Chapter. I also sit on the Municipality of Anchorage 1% for Public Art Committee and the Anchorage Symphony Orchestra Board of Directors. I am writing in **OPPOSITION to House Bill 159**.

I have served on the Interior Design Working Group, a group that was requested by the AELS Board and consists of both architects and interior designers. For the first six months, our group analyzed interior design regulation in other states, considered the needs for regulation in Alaska. Without knowledge of the Working Group, SB 73 was introduced in February 2023. HB 159 is an early version of SB 73 and has the same fundamental flaws. Over the past year, the architects of the Working Group, as well as the Alaska Chapter of the American Institute of Architects (AIA) and many in allied industries have taken every possible opportunity to recommend changes in the best interest of the state's general public, construction industry, and design professionals. SB 73's sponsor has declined to consider amendments that would resolve the onerous nature of the bill.

Alaska's board of Registration of Architects, Engineers, and Land Surveyors is designated in both HB 159 and SB 73 to regulate the interior design profession has **voted in opposition** of including interior design under their purview.

There is no evidence that HB159 is necessary for the Health, Safety, and Welfare of the public – there exists no problem to solve. This proposed legislation is unnecessary and confusing and would not protect the consumer or increase public safety. In fact, it will limit consumer choices in selecting interior designers because HB159 restricts the practice to only those persons who have advanced education and experience and have passed an examination. There are fewer than 21 people in Alaska who hold this credential.

Based on the above comments I urge you to OPPOSE House Bill 159.

Regards,



Jessica Cederberg, AIA

cc: Representative Andrew Gray, Senator Forest Dunbar
AIA Lobbyist dianneblumer@gmail.com

January 17, 2024

Honorable Jesse Sumner, Chair
House Labor and Commerce Committee
Sent via email to: House.Labor.And.Commerce@akleg.gov

Dear Chair Sumner and members of the House Labor & Commerce Committee,

I am writing in opposition of HB 159, a bill to regulate interior design and interior designers.

I have served on the Alaska Board of Registration of Architects, Engineers, and Land Surveyors (AELS) since 2016, and I am currently serving my second term as Board Chair. While the AELS Board has taken actions relating to proposed legislation to regulate interior design, this letter reflects my personal position only.

I have been an active part of many discussions about possible regulation of interior design for over 5 years. During the past 1.5 years, I have served on the Interior Design Working Group, a group that was initiated by the AELS Board and consists of both architects and interior designers. For the first six months, our group analyzed interior design regulation in other states, considered the needs for such regulation in Alaska, and, with the help of AK Division of Professional Licensing staff, studied three possible models for interior design regulation, if such regulation was deemed necessary by the legislature.

Without knowledge of the Working Group, SB 73 was introduced in February 2023. HB 159 is an early version of SB 73 and has the same fundamental flaws. Over the past year, the architects of the Working Group, as well as the Alaska Chapter of the American Institute of Architects (AIA) and many in allied industries (eg. engineers, construction, AELS Board) have taken every possible opportunity to recommend changes in the best interest of the state's general public and design/construction industries. SB 73's sponsor has declined to consider amendments that would resolve the onerous nature of the bill.

My request to you is that if you feel that interior design needs to be regulated, please work with the architects, engineers, contractors, and regulators of Alaska to amend HB 159 to address concerns.

Alaska currently has an excellent record of building safety and no examples of actual or perceived threats to public health, safety, or welfare due to the current lack of interior design regulation. Consumers have not requested this legislation. Rather, it has been promoted by a handful of interior designers who will financially benefit from its passage. In 2023, only 21 Alaskans held the credential required to become a registered interior designer under this bill. Additionally,

- No other state in the country has a comparably onerous law in place, and some jurisdictions have repealed interior design laws after legal challenges.
- Carrying out these regulations would be expensive and complicated to implement, increase costs to consumers, reduce access to basic design services statewide, and

negatively impact a large number of people who currently perform interior design services.

- Alaska's board (AELS Board) that is designated in both HB 159 and SB 73 to regulate the interior design profession has opposed adding interior design to their duties. Further, the AELS Board has suggested changes to SB73 that have been ignored.

I urge you to oppose HB 159. I am available to answer questions or provide additional information about this topic.

Thank you, sincerely, for your time on this matter and for the important work you do for our state.

Catherine Fritz, AIA, NCARB

C: Representative Sara Hannan, Senator Jesse Kiehl

Date: January 24, 2024

Email: House.Labor.And.Commerce@akleg.gov
Representative.Jesse.Sumner@akleg.gov
Representative.Justin.Ruffridge@akleg.gov
Representative.Mike.Prax@akleg.gov
Representative.Dan.Saddler@akleg.gov
Representative.Stanley.Wright@akleg.gov
Representative.Ashley.Carrick@akleg.gov
Representative.Zack.Fields@akleg.gov

Re: Opposition to HB 159 REGISTER INTERIOR DESIGNERS

Dear House Labor and Commerce Members,

As an AIA Alaska Member, Alaska Resident, and a Registered Architect in the State of Alaska for the past 29 years, I am writing to ask that you do not support the passage of HB 159: An Act relating to registered interior designers and interior design.

- There is no evidence presented that HB 159 will solve a problem that at this time does not exist.
- This proposed legislation is unnecessary and confusing and would **not protect the consumer or increase public safety**.
- I do not believe that current regulation of building design and engineering should be changed, the existing restricted scope of work for architects and engineers should remain as they are.
- I oppose the cost of Interior Design regulation being passed on to existing licensees. I support a regulation fee structure that is borne by the affected Interior Design licensees.

Based on the above comments I urge you to **OPPOSE** the passage of House Bill 159.

Respectfully yours,

David L. McVeigh

cc: District 9 Representative.Jesse.Sumner@akleg.gov
AIA Lobbyist: dianneblumer@gmail.com

AIA Alaska OPPOSES HB 159, “An Act relating to registered interior designers and interior design...” as currently drafted.

The scope of restricted practice for interior design is too broad and confusing (Sec. 32. AS 08.48.341). The definition of ‘interior technical submissions’ (24) encroaches into the responsibilities of construction contractors and material/equipment manufacturers. Section (25) “the practice of registered interior design” (A) (i) “includes the professional service of creative work.” restricts other professions from doing creative work on buildings. Sections (25)(B)(iii/vi/vii) use terms defined in the International Building Code but lacks clarification on key life-safety considerations. Industry peers have confirmed this section intends to reduce the qualifications required to change emergency exit components and fire rated construction.

Restrictions at odds with the intent to address labor shortage and safety (Sec 29 AS 08.48.331 (a) (8)). This section has historically allowed over 300 entities with interior design services listed on their business license with the Alaska Department of Commerce to perform services related to interior finishes that are not health, safety, or welfare related. This includes interior finishes such as paint, floor coverings, and furnishings. The impact of the changes to this section will restrict this work to interior designers with NCIDQ qualifications. In 2023, there were approximately 21 NCIDQ qualified Interior Designers in Alaska. AIA Alaska and industry peers with concerns about this provision agree that it is not needed to protect life-safety and will restrict the market for many interior design businesses, as well as those contractors and owners who self-preform interior design on their own buildings, thereby inflating the cost of interior design services in Alaska.

HB 159 represents an unprecedented change in licensing for the design and construction industry and is the only bill like this in the United States.

No other state has adopted a law with similarly broad understanding of regulated interior design scope, and only two states have any laws restricting the practice of interior design.

- There are no threats to the health, safety, and welfare of the public that the proposed legislation would resolve.*
- No other state in the country has a comparably onerous law in place, and some jurisdictions have removed interior design regulations after legal challenges.*
- Carrying out these regulations would be expensive and complicated to implement, increase costs to consumers, reduce access to basic design services statewide, and benefit only a very small number of interior design business owners.*
- Alaska’s regulatory board (AELS Board) that is designated in this bill to regulate the interior design profession has voted in opposition of including interior design under their purview.*
- Alaskan architects, engineers, contractors, regulators, and building suppliers who are informed on these bills describe them as unnecessary and harmful to the overall design and construction industry in Alaska.*

Therefore, we urge that you protect the excellent safety record of buildings in Alaska and maintain fair access to design services for the public by opposing the special interest legislation of HB159.

Questions and discussions are welcomed!

Please direct any questions to: AIA Alaska, attention Jessica Cederberg, 2024 AIA Alaska President
phone: (907) 276-2834 or email: contact@aialaska.org

From: Natasha Schmidt <nschmidt@SALT-AK.com>
Sent: Tuesday, January 30, 2024 3:09:11 PM
To: Rep. Jesse Sumner <Rep.Jesse.Sumner@akleg.gov>
Subject: Please pass HB159

I urge you to support HB159 adding Interior Designers.

Ensuring that interior design affecting public safety is appropriately regulated through licensure is good for all Alaska. This bill would allow professional interior designers qualified by a combination of education, experience, and examinations to take responsible charge of their work which impacts the public's life safety and welfare.

It is time for Alaska to establish professional registration for interior designers qualified by education, experience, and examination, to practice independently, with stamp and seal privileges, within a limited scope of work for which they are specifically trained and tested to do.

Opponents may claim that there is no need for this action and no problem to solve. However, the same was said regarding licensure for landscape architects and nurse practitioners. Now, we all see the benefits of their work as valuable contributors to our state.

I am an interior designer and business owner in Anchorage and fully support this legislation and encourage you to do the same. This is a bill whose time has come. Thank you for your consideration of support.

Natasha Schmidt, NCIDQ, ASID
Design Principal + Operations

SALT
907.229.9351 C | 907.278.0069 D
www.salt-ak.com

I will be on vacation Feb 21-26.
I am out of the office Fridays, but available on my cell.

At SALT we value and respect flexible work arrangements. I sometimes send emails outside normal work hours. No need to respond to my emails outside of your work hours.

> Hello,

> Please pass HB 159. This bill will keep Alaska's public buildings and facilities safe by ensuring qualified and educated designers are designing and inspecting them. I am a licensed landscape architect and have been practicing in the state in design, construction, operations and maintenance of public facilities for almost twenty years. Licensing all of our design professionals is critical to ensure a competent and professional team. Architects are an important team member but we also need professionals from each design focus, including interiors, to ensure the whole building protects the health, safety and welfare of the public. Pass HB 159.

> Thank you,

> Michele Elfers

May 5th, 2023
State of Alaska,
Juneau, AK

To: Honorable Jesse Sumner
Chair
House Labor & Commerce

Dear Mr. Chair & Members of the House Labor & Commerce Committee:

HB 159, Registration for Interior Designers

My name is Melissa Pribyl, I'm a born and raised resident of Anchorage Alaska, a commercial interior designer, and a partner at one of the Architecture and Design Firms here in Alaska.

HB 159 is very important to me. As an interior designer qualified through education, experience, and national examination to protect public safety in commercial buildings, I should be allowed to practice the full scope of commercial interior design and take responsibility for my own work. When you look at the timeline of design professions, (architects, engineers, landscape architects, land surveyors, etc.) you will find that interior designers are the newcomers, born in the 20th century out of necessity for a honed skill and knowledge set that compliments these disciplines to increase positive outcomes for our community and our environment. Our 21st century budgets and construction schedules need a team, a team of diverse individuals with specific education and skill sets that contribute to the success of the project as a whole. I am part of that educated team, alongside my fellow architects.

My firm brought on their first Commercial Interior Designer in 2015. Before that, they would do one of two things; they would contract out the material selection work to an interior designer who resided in Oregon, or they selected materials and colors after the construction documents were completed from a chain set of options provided by the contractor and design interior details in shop drawings. Those in our firm that say they are "guilty" of this laugh when we bring our ideas on more than "just finishes" to the drawing table at the start of a project. As once a new hire to a startup architectural firm, they were "surprised" when I could answer questions pertaining to the international building code (IBC) regarding exiting and egress. interior design is a direct arm to architecture. It is a subject matter that has direct resources for study, examination, and implementation. Architects know this, as they are also educated in the specialty. We are qualified to be recognized alongside architects for our knowledge in interior design and allow the public to be protected from individuals that have no education or examination to follow up their choices.

There are firms that are recognizing the need for diversity and inclusion in more ways than just the sex or race of an individual, but also in professional diversity. In 2016 I witnessed our firm hire their first female architect in the 40 years of their existence and promote their first female interior designer to partner in 2018. I followed as partner in 2023. Since 2015 our interior

design department has developed new vertical markets for our company and increased our revenue stream.

HB 159 will expand consumer choice of qualified design professionals, encourage small businesses, increase professional employment and salary opportunities, encouraging high-quality design talent to remain or relocate to Alaska, and reduce the professional workforce gap. It will also encourage hiring Alaskans instead of “outside experts” for professional interior design, and support those earning interior design degrees outside our state to return home for professional registration, like me.

I know you have been presented with many facts in the past few weeks regarding this bill. I hope this perspective from an Alaskan business owner helps illustrate our need for diversity of registered professional services. Interior designers and the profession will continue to grow in numbers, grow in knowledge, and grow our economies while helping to create a healthy, safe, and beautiful built environment with our fellow Architects. [Please support HB 159](#) to protect public safety, expand consumer choice of qualified design professionals, and bring economic benefits to our great state of Alaska.

Sincerely,
Melissa Pribyl, Principal at MCG Explore Design

12200 Shiloh Rd, Anchorage, AK 99516
mpribyl@exploredesign.com

Informational video: [What Does an Interior Designer Actually Do?](#)

January 19, 2024

To: The Honorable Jesse Sumner, Chair
House Labor & Commerce

CC: House Labor & Commerce Members

I am asking for your support of HB 159, Professional Registration for Interior Designers

Simply put, HB 159 Registration for interior designers will:

- Allow non-registered interior designers to practice as they have in the past.
- Increase consumer choice of qualified design professionals and encourage small businesses.
- Incorporate all design professions impacting Health, Safety and Welfare into one board.
- Allow registered interior designers to take responsibility for their own work by stamping for interior, non-bearing, construction documents for permit.
- Attract high-quality design talent Alaska, helping reduce the professional workforce shortage.

It is time for Alaska to establish professional registration for interior designers qualified by education, experience, and examination, to practice independently, with stamp and seal privileges, within a limited scope of work for which they are specifically trained and tested to do.

HB 159 will create reasonable regulation to protect public health, safety, and welfare of Alaskans.

Interior designers who are qualified through accredited education, experience and examination through the internationally recognized 3-part NCIDQ certification exam are well-qualified to:

- Understand, develop and execute interior technical submissions including plans, specifications and contract documents complying with applicable codes, regulations, and guidelines and to coordinate with other engineering professions to provide a complete construction package.

The interiors design scope of work includes the design of interior non-bearing wall and ceiling configurations: occupancy class determination, occupant load analysis, exit analysis including number and location of internal exits/exit access, path of travel distance/clear width, and accessibility.

Interior designers are uniquely qualified to specify interior materials, furnishings, and fixtures, which require knowledge of accessibility and egress clearances, infection mitigation and control, combustibility, flame spread, smoke propagation, material toxicity, and slip resistance.

Please support HB 159 Registration for Interior Designers to protect public safety, increase consumer choice, and bring economic benefits to Alaska and make the Alaskan design community stronger.

Sincerely,



Mary G Knopf, FASID, NCIDQ

9401 Arlene Dr

Anchorage, AK 99502

May 6th, 2023

To: House Labor & Commerce
State of Alaska
Juneau, Alaska

Subject: **Support for HB 159, Registration for Interior Designers**

Mr. Chair & Members of the House Labor & Commerce Committee:

I support HB 159 and encourage you to do as well. It is very important to me as a business owner of an Architectural and Interior Design Firm in the State of Alaska. Our firm MCG Explore Design supports over \$150 - 200M in design construction support every year for the last 30 years. Part of that support is the value of Interior Design professionals which are an integral for designing & building successful outcomes and supporting resilient communities. Why:

- Licensure and Registration of Interior Design professionals is essential to provide highly quality professional design services to our clients and holds them accountable as you would an Architect.
- As a successful business owner, I believe that Interior Design professionals are qualified to be recognized equally alongside Architects for their knowledge of interior design and need registration to close the loop on professional equality.
- Interior Design professionals qualified through education, experience, and national examination to protect public safety in commercial buildings should be registered and licensed to practice the full scope of commercial interior design in Alaska.
- In 2015, my firm MCG Explore Design hired our first Interior Design professional and it changed the landscape of our potential for delivering excellence in design services for our clients and community. Our Interior Design department has developed new vertical markets for our company and increased our revenue stream benefiting Alaska.
- HB 159 will expand consumer choice of qualified design professionals, encourage small businesses, increase professional employment and salary opportunities, encouraging high-quality design talent to remain or relocate to Alaska, and reduce the professional workforce gap.

Sincerely,
John T. Weir, Principal at MCG Explore Design

5200 Celtic Drive, Anchorage, AK 99516
jweir@mcalaska.com

Informational video: [What Does an Interior Designer Actually Do?](#)

Statement of Support for Regulation of ICOR Professions May 2023

The current debate regarding the role of professional licensure in the United States must include acknowledgement of the value of state licensing boards. These boards are typically made up of citizen volunteers appointed by governors who license professionals and enforce licensing rules consistent with laws passed by their legislatures and with support and guidance from state government officials. Licensing boards in each state and territory have the unique and important responsibility of protecting the public health, safety, and welfare of their citizens by establishing the standards necessary for competent practice.

The Interorganizational Council on Regulation (ICOR), comprised of the four regulatory organizations for the design professions, was formed almost two decades ago to share best practices and discuss our complementary focus on advocating on behalf of the public protection role our regulatory boards play. As nonprofit associations, membership in our organizations is comprised of these boards—whose functions include licensing and other credentialing—for architecture, engineering, interior design, landscape architecture and surveying. In many jurisdictions these professions are overseen by the same board.

Our collective mission is to support and advocate for smart, reasonable regulation focused on protecting the public health, safety, and welfare and to facilitate licensure of qualified professionals. As all the design professions (architecture, engineering, interior design, landscape architecture and surveying) have an impact on health, safety, and welfare in the built environment, ICOR supports the reasonable regulation of each profession to ensure public protection.

ICOR member professions share common licensure elements as well as performing some of the same tasks. While this ‘practice overlap’ does exist, it is important to note each of these professions are unique and distinct, with a role in protecting the health, safety, and welfare of the public. It is common to see these professions regulated by a multi-disciplinary board as well as having these separate professions working on the same design project. That collaboration is vital to the design process and does not diminish the individual impact that each profession has on protecting the public.

Architecture, engineering, interior design, landscape architecture and surveying professions intersect when working on buildings, the environments surrounding buildings, transportation corridors, and our nation’s infrastructure. ICOR-related professions are involved in the construction process, planning, designs, drawings, and stamping and sealing documents, essential to obtaining building permits and other necessary approvals for construction.

Statement of Support for Regulation of ICOR Professions May 2023

Collaboration between licensed professionals is essential to collectively protect the health, safety, and welfare of the public. A featured example are hospitals. Hospitals are complex buildings comprised of many departments that provide the myriad of services necessary for successful health outcomes. It is essential that qualified design professionals work together in creating safe environments that protect the health, safety, and welfare of patients, healthcare providers, and visitors occupying these buildings. With the increased presence of life threatening, highly communicable viruses the importance of safe, well-designed healthcare facilities has never been more important.

- **Architects** develop construction documents that include appropriate department layouts for efficient care and pathways for safe emergency evacuation.
- **Professional engineers** design systems to remove contaminated air, provide oxygen for life support and supply critical emergency power.
- **Interior designers** address accessibility requirements, specify finishes and materials to reduce slip and fall hazards, and select surface materials to minimize hospital-acquired infections.
- **Landscape architects** design comprehensive site plans including stormwater management systems, circulation of pedestrians and vehicles and areas of therapeutic landscape that positively impact patient outcomes.
- **Surveyors** identify boundaries and make sure that the design is correctly laid out on the ground.

These systems, and many more, must be carefully designed, coordinated, and integrated by qualified design professionals through a highly collaborative process to provide safe buildings.

Due to the commonalities in regulation and practice, as well as the profound impact on the public and environments, **we unequivocally support the continued licensure of architecture, engineering, interior design, landscape architecture and surveying.** At stake are billions of dollars' worth of infrastructure and site improvements every year, and the safety of persons and property these improvements affect. Oversight of these professions is essential to protecting the public's health, safety, welfare, while minimizing the risks associated with technical design professions.

Respectfully,



Thom Banks, CEO
CIDQ



Matt Miller, CEO
CLARB



Mike Armstrong, CEO
NCARB



David Cox, CEO
NCEES

INTERORGANIZATIONAL COUNCIL ON REGULATION

Statement of Support for Regulation of ICOR Professions
May 2023

January 16, 2024

State of Alaska,
Juneau, AK

To: Honored Committee Members
House Labor and Commerce Committee

HB159 Professional Registration for Interior Designers

Dear Alaska Legislators:

As leaders of one of Alaska's oldest architectural firms, we are writing to express our support of HB159 and its companion bill SB73. This bill will expand professional design in Alaska by allowing NCIDQ certified interior designers to become registered, allowing them to take responsible charge for commercial interior renovations and similar projects.

We feel strongly that NCIDQ certified interior designers are qualified to perform this type of work. In fact, our own new office in Anchorage was designed and overseen by an NCIDQ certified interior designer. She developed the design, identified code and life safety issues, produced the plans and specs, coordinated with mechanical, electrical and structural engineers, and worked with Municipal plan reviewers to obtain a building permit. While this same work could have been completed by an architect, it is telling that a firm of mostly architects chose an interior designer to oversee the type of project that this bill contemplates.

This bill will remove unnecessary barriers and will have many positive benefits to the State of Alaska:

- It will help Alaska attract and retain design professionals, making our State one of the most attractive places in the nation to be an interior designer.
- It will increase consumer choice for design of interior construction projects.
- It will remove existing barriers that favor architects on projects for which NCIDQ certified interior designers are equally qualified to protect life, safety and welfare.

We urge the Alaska Legislature to pass HB159 and SB73.

With Kind Regards,



Brian Meissner, AIA

Jason Swift, AIA

Justin Scanio, AIA

ECI Alaska

4/24/2023

Representative Jesse Sumner
Chair, House Labor and Commerce Committee
Alaska State Legislature

Chair Sumner, members of the committee,

My name is Matthew Barusch, Director of Government Affairs with the Council for Interior Design Qualification (CIDQ). I write to you today in support of House Bill 159, which would protect the health, safety, and welfare of the public if passed.

Our organization develops and administers the three-part NCIDQ Examination, the national interior design certification examination. Like the architecture profession, NCIDQ-Certified Interior Designers are required to undergo formal postsecondary education and thousands of hours of paid, supervised experience to sit for the examination, which tests interior designers' knowledge of core competencies required for professional practice in the industry. This combination of education, experience, and examination helps ensure minimal competency of our certificate holders in the distinct practice of interior design, most of which practice in commercial, code-based environments like office buildings, hotels, hospitals, schools, etc.

In December 2021, the National Council of Architectural Registration Boards (NCARB), the national organization that administers the exam for architect licensure of which the Alaska AELS Board is a member, and CIDQ issued a [joint report](#) that assesses areas of correlation and distinction between the knowledge, skills, and tasks required for competency in the fields of architecture and interior design. This collaborative effort identified several areas of definite similarity between the professions and their respective examinations, as well as areas where there is some similarity or no similarity, and consequently [found that](#): ***“architecture and interior design are unique and distinct disciplines that both have an important role in protecting the health, safety, and welfare of the public within the built environment.”***

As stated by the [Virginia Department of 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.”*** In short, legal recognition of interior designers as design professionals is necessary to protect the public from incompetent practice, which the exam cannot do on its own without state oversight. State oversight of interior designers utilizing the NCIDQ Exam offers the state and the public assurance that interior designers are qualified to practice in a manner that protects the public.

Passing this legislation would ensure that interior designers that are registered with the state are qualified and help protect public safety in Alaskan public spaces. CIDQ thanks Senator Claman for introducing this legislation and we ask the committee to vote yes on this bill. I'm happy to be a resource to the committee to answer questions about our exam.



Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Barusch'.

Matthew Barusch
Council for Interior Design Qualification

Colin Maynard, PE, SE, F.NSPE
2407 W 32nd Ave
Anchorage, AK 99517
akbosco@aol.com
907-248-2831

May 5, 2023

The Honorable Jesse Sumner
Chair, House Labor & Commerce Committee
State Capitol Room 421
Juneau, AK 99801

Re: Support HB 159, Registration of Interior Designers

Dear Mr. Chair & Members of the House Labor & Commerce Committee:

I am writing to support passage of HB 159, Registration of Interior Designers. I am a registered Professional Civil Engineer and Structural Engineer and served for eight years on the Board of Architects, Engineers, and Land Surveyors, including two terms as its Chair. From that experience, I am aware that the only reason to license a profession is to protect public health, safety, and welfare by ensuring that the practitioners have the three-legged stool of licensure: education, experience, and examination. We currently have that framework for architects, engineers, land surveyors, and landscape architects. Interior designers work in the same field and should also be registered.

Interior Designers can do work that affects the public safety, whether that is code compliant exiting, fire walls, or flame spread of materials or meeting the Americans with Disabilities Act (ADA) requirements. If they are qualified by the three-legged stool of licensure, they should be able to stamp their work, without going to an architect to approve their work. Adding Interior designers to professions governed by the AELS Board will allow more options to the public than are available now, as they will be able to employ either an architect or an interior designer to lay out or modify their interior spaces.

If you or any member of the committee has any questions about this bill or registering design professionals, in general, I am willing to attempt to answer them.

Respectfully,



Colin Maynard, PE, SE, F.NSPE

Cc: House Labor & Commerce Members

January 21, 2024

To: The Honorable Jesse Sumner, Chair
House Labor & Commerce

CC: House Labor & Commerce Members

Please Support HB 159, Professional Registration for Interior Designers

HB 159 proposes reasonable regulation to protect public health, safety, and welfare, by establishing professional registration for interior designers qualified by education, experience, and examination, to practice independently, with stamp and seal privileges, all within a limited scope of work for which they are specifically trained and tested to do.

Interior designers of public-occupancy buildings directly impact public health, safety, and welfare in most aspects of their work. Interior designers who have earned an accredited university degree, completed hands-on training, and successfully passed the internationally-recognized 3-part NCIDQ certification exam are well-qualified to understand and execute the following public safety design responsibilities:

- Design of interior non-bearing wall and ceiling configurations: occupancy class determination, occupant load analysis, exit analysis including number and location of internal exits/exit access, path of travel distance and clear width, accessibility within suites and to exits
- Design and specification of interior materials, furnishings, and fixtures, which require knowledge of the following: accessibility and egress clearances, infection mitigation and control, combustibility, flame spread, smoke propagation, material toxicity, and slip resistance
- Development of interior technical submissions (i.e., plans, specifications, contract documents) in compliance with applicable code, regulation, and guideline requirements; fire detection/suppression device location coordination and coordination with other engineering professions to provide a complete construction package

HB 159 Registration for interior designers will:

- Be voluntary: non-registered interior designers may work in the residential market (single to 4-plex, with height restrictions) or under the direct supervision of a registered interior designer or a registered architect for commercial work
- Be compatible with all design professions: architects will be exempt from this registration and architects that wish to provide interior design services may continue to do so.
- Be considered self-funded through the existing AELS Registration Board fee structure with a minimal increase per license holder.
- Provide a professional stamp for interior non-bearing construction document permitting, giving registered interior designers direct responsibility for their own work which currently must be supervised and over-stamped by a registered architect.

HB 159 Economic Benefits to Alaskans:

- Expands consumer choice of qualified design professionals; encourages small business.
There are very few interior design small businesses in Alaska which perform the work addressed in HB159. It is generally not feasible to independently practice interior design in Alaska outside of private residential work since plan review and permitting necessitate the involvement of a registered architect to oversee and overstamp a designer's work, adding time and expense to projects for clients with limited schedules and budgets.
- Encourages hiring Alaskans instead of "outside experts" for professional interior design.
Most Federal agencies and entities require credentialed Interior Designers under the Unified Facility Criteria (UFC) and/or the Whole Building Design Guide (WBDG). These include U.S. General Services Administration, U.S. Department of Defense (all branches of the military), Department of Veteran Affairs, National Park Service, and Administrative Office of the United States Courts, amongst many others. Many times, these entities seek services outside Alaska, but instituting professional registration for interior designers would make it easier to identify qualified professionals within Alaska and keep that work here.
- Encourages Alaskans earning interior degrees Outside to return home.
My concern for workforce development has only increased in the last several years. The design professions face a shortage of talent amongst all disciplines at all levels nationwide and the post-pandemic market has only increased competition for recruiting. The breadth of upcoming work across Alaska requires both design and construction workforces to take full advantage of the funding allocated to Alaska in the recent Infrastructure Investment and Jobs Act. It is critically important that Alaska positions itself as an ideal place to start and advance a career, build a life, grow families, and engage in community.
- Ensures unrestrained access to market, enabling qualified design professionals to practice to the full extent of their education, training, and examination, and take responsibility for their work.

Please support HB 159 Registration for Interior Designers to protect public safety, expand consumer choice, and bring economic benefits to Alaska.

Informational video: [What Does an Interior Designer Actually Do?](#)

Sincerely,

Dana Nunn
1605 Atkinson Drive
Anchorage, AK 99504
dnunn@bettisworthnorth.com
(907) 223-8466

Representative Sumner,

I am an Architect who strongly favors the passage of HB 159.

I have been strongly in favor of this initiative for several years and encourage the House Labor and Commerce Committee to pass this legislation out of Committee.

Among the many reasons I support this legislation are the following:

- The US Corps of Engineers now requires registered interior designers to provide interior design services on their projects. Given the increasing number of Military projects in Alaska, if this licensure is not available to Alaska residents, this work will necessarily be contracted with registered interior designers outside of Alaska.
- Currently Alaska Architectural firms hire interior designers who are not registered, and do not seal the documents they prepare, the Architects then seal these documents and assume all the liability. With registered Interior Designers, architects can and will hire these professionals, who will seal their documents, thereby significantly reducing the liability of the architects.

Thank you and the Committed for favorably considering this legislation.

CB Bettisworth.

From: Cara Rude <cruude@exploredesign.com>
Sent: Tuesday, January 30, 2024 11:15:48 AM
To: Rep. Jesse Sumner <Rep.Jesse.Sumner@akleg.gov>
Subject: Support HB159

Representative Sumner,

My name is Cara Rude and I am in support of HB159. When I became an owner of the longest established and among the largest architectural practices in Alaska, the lack of professional registration for interior designers became an impediment and the company had to restructure from a Professional Corporation to an LLC.

This bill reflects the reality of the modern design marketplace. Accelerated construction timelines and constant technology advancements has led to the demand for Interior Designers that provide a focused education on environments to support human health, wellness, ethical material chemistry, commercial public life safety and the responsibility to reduce embodied carbon.

I believe this bill will lead to better built environments and safeguard an elevated design marketplace for consumers.

Best Regards,

Cara Rude, ASID, NCIDQ, LEED AP BD+C, WELL AP, NEWH
Principal, Interior Designer
T 907.865.8226 | **M** 907.398.5379



www.exploredesign.com



From: Ashley Killian <akillian@exploredesign.com>
Sent: Tuesday, January 30, 2024 11:35:57 AM
To: Rep. Jesse Sumner <Rep.Jesse.Sumner@akleg.gov>
Subject: Please Support HB 159!

Good morning Representative Sumner,

Please Support HB 159, Professional Registration for Interior Designers!

HB 159 proposes reasonable regulation to protect public health, safety, and welfare, by establishing professional registration for interior designers qualified by education, experience, and examination, to practice independently, with stamp and seal privileges, all within a limited scope of work for which they are specifically trained and tested to do.

Interior designers of public-occupancy buildings directly impact public health, safety, and welfare in most aspects of their work. Interior designers who have earned an accredited university degree, completed hands-on training, and successfully passed the internationally-recognized 3-part NCIDQ certification exam are well-qualified to understand and execute the following public safety design responsibilities:

- Design of interior non-bearing wall and ceiling configurations: occupancy class determination, occupant load analysis, exit analysis including number and location of internal exits/exit access, path of travel distance and clear width, accessibility within suites and to exits
- Design and specification of interior materials, furnishings, and fixtures, which require knowledge of the following: accessibility and egress clearances, infection mitigation and control, combustibility, flame spread, smoke propagation, material toxicity, and slip resistance
- Development of interior technical submissions (i.e., plans, specifications, contract documents) in compliance with applicable code, regulation, and guideline requirements; fire detection/suppression device location coordination and coordination with other engineering professions to provide a complete construction package

HB 159 Registration for interior designers will:

- Be voluntary: non-registered interior designers may work in the residential market (single to 4-plex, with height restrictions) or under the direct supervision of a registered interior designer or a registered architect for commercial work (public occupancy).
- Be compatible with all design professions: architects will be exempt from this registration and architects that wish to provide interior design services may continue to do so.
- Be considered self-funded through the existing AELS Registration Board fee structure with a minimal increase per license holder.
- Provide a professional stamp for interior non-bearing construction document permitting, giving registered interior designers direct responsibility for their own work which currently must be supervised and over-stamped by a registered architect.

HB 159 Economic Benefits to Alaskans:

- Expands consumer choice of qualified design professionals; encourages small business.
- Increases professional employment and salary opportunities in Alaska, attracting high-quality design talent to the state and helping to reduce the professional workforce gap.
- Encourages hiring Alaskans instead of “outside experts” for professional interior design.
- Encourages Alaskans earning interior degrees Outside to return home.

Please support HB 159 Registration for Interior Designers to protect public safety, expand consumer choice, and bring economic benefits to Alaska.

Informational video: [What Does an Interior Designer Actually Do?](#)

Sincerely,

Ashley

Ashley Killian, Allied ASID
FF&E Specialist, Interior Designer
T 907.563.8474 | **M** 907.306.6436



www.exploredesign.com

May 8, 2023

House Labor and Commerce Committee
Honored Committee Members

Please Pass HB 159 Register Alaska Interior Designers

I'm writing to ask your support for HB159, to register interior designers in Alaska's public and private buildings.

Why this Bill is Good Public Policy for Alaskans:

- **Protects public safety.** Regulates the currently unregulated interior design practice affecting public health, safety, and welfare in Alaska's buildings; requires interior design education, experience, and a national exam including application of codes, regulations and guidelines to provide these services.
- **Increases Alaska's competitiveness for Federal Work.** The US Department of Defense requires registered interior designers for building design projects; the HB 159 registration boosts our ability to compete with outside firms, keeping the work, revenue, and registration in Alaska.
- **Allows registered interior designers** to autonomously practice regulated interior design, stamp and submit their work for permit. Expands consumer choice; increases qualified professionals.
- **Allows unregistered interior designers** to work in the regulated scope of practice under direct supervision of a qualified professional, or independently provide non-regulated services in buildings, and residential single-family to 4-plex.
- **Maintains the practice of architecture** in Alaska. Architects also practice interior design.

Please support HB 159, it is good for Alaskans.

Respectfully,



Barbara L. Cash, FASID, IIDA, NCIDQ, LEED AP • 2265 Arcadia Drive, Anchorage, AK 99517 • bcash@best-yet.net



Alaska Professional Design Council

PO Box 240753
Anchorage AK 99524
AlaskaAPDC@gmail.com

MEMBER SOCIETIES

Alaska Society of
Professional Engineers
(ASPE)

Alaska Society of
Professional Land
Surveyors (ASPLS)

American Society of Civil
Engineers, Alaska Section
(ASCE)

American Society of
Landscape Architects,
Alaska Chapter (ASLA)

American Society of
Interior Designers, Alaska
Chapter (ASID)

Institute of Transportation
Engineers, Alaska Section
(ITE)

Structural Engineers,
Alaska (SEAAK)

May 8th, 2023

To: the Alaska House of Representatives Labor and Commerce Committee,

The Alaska Professional Design Council (APDC) is a non-profit organization that serves as the voice of 1,150 design professionals across the state. Our members include licensed professionals who are committed to protecting the health, safety, and welfare of the public, as well as those seeking licensure to do the same. Together, our member organizations work collaboratively to represent the common interests of Alaska's design professionals and advocate for the advancement of the design practices represented.

We are writing in support of the passage of HB 159, which proposes the Registration of Interior Designers. These professionals are responsible for designing and modifying interior spaces in both public and private buildings. Their work involves non-structural design elements that can impact life-safety, such as accessibility, exiting access components, fire ratings of walls, and fire ratings of finishes.

Currently, there are no requirements for qualifications in Alaska for providing interior design services within buildings. This lack of regulation puts public safety at risk. By introducing licensure for registered Interior Designers, the public can be better protected. This licensure will ensure that those engaging in this work have the necessary education, experience, and examination qualifications, as with other design professionals.

Passage of HB 159 would allow qualified Interior Designers the autonomy to independently engage in regulated Interior Design practice. They are educated, extensively trained, and have undergone rigorous testing to ensure their expertise in this field. Additionally, licensure will allow them to stamp and submit their own permit drawings, which aligns with their qualifications.

As the APDC, we stand firmly in support of this bill and are available as a resource to answer any questions you may have. Thank you for your time and consideration.

Sincerely,



David Gamez, P.E.
APDC President



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Commerce, Community,
and Economic Development**

BOARD OF REGISTRATION FOR ARCHITECTS,
ENGINEERS, AND LAND SURVEYORS

P.O. Box 110806
Juneau, Alaska 99811-0806
Main: 907.465.2550
Toll free fax: 907.465.2974

January 18, 2024

The Honorable Jesse Sumner, Chair
House Labor & Commerce Committee
Alaska State Capitol, Room 421
Juneau, Alaska 99801
Sent via email to House.Labor.And.Commerce@akleg.gov

Re: House Bill 159, "An Act relating to registered interior designers and interior design"

Dear Chair Sumner,

I am writing to update the House Labor and Commerce Committee on actions by the Board of Registration of Architects, Engineers, and Land Surveyors (AELS) related to the regulation of interior design and interior designers. At our May 2023 meeting, AELS took the following actions:

1. The Board does not recommend adding the profession of interior design to 08.48 (AELS Board).
2. If SB 73 is advanced by the legislature, the AELS Board offers the following recommendations to CS-D:
 - Remove all references in the bill to AELS Board make up (Section 1, 2, 3 and 38).
 - Remove item (15) of Section 27.
 - In Section 30, delete (B) and revise to meet the following: *"review of drawings and specifications of interior spaces made by regulatory agencies."*
 - In Section 37, revise to read as follows: *"Sec 37. TRANSITION: CURRENT INTERIOR DESIGNERS. Notwithstanding this Act, a person working as an interior designer before the effective date of this Act may continue to practice interior design in the state until 90 days after the effective date of regulations established in 12 AAC 36 or 2 years after the effective date of this Act, whichever comes first, at which time they must register if they wish to practice registered interior design as described in AS 08.48.341."*

When House Bill 159, "An Act relating to registered interior designers and interior design..." was introduced last April, it was a companion bill to Senate Bill 73. During the final weeks of last session, SB 73 was amended while no action was taken on HB 159. AELS has not yet reviewed HB 159 to recommend amendments, although some of the bullets above are the same in each bill.

The AELS Board has discussed the topic of interior design regulation at length for more than 3 years and held 2 special meetings on SB 73 during the 2023 legislative session. We have also raised concerns through written and verbal testimony during hearings on both SB73 and its predecessor bill from the 32nd Alaska Legislature, HB 61. While opinions of individual AELS Board members vary, the majority does not support adding the new profession of interior design to AS 08.48, the statute that authorizes the AELS Board. Discussion encouraged interior design to be regulated under a different framework if regulation is needed or desired.

We appreciate being allowed to engage in discussion about this legislation that, if approved, will add to the Board's responsibilities. Please contact me if you would like more detailed information.

Sincerely,



Catherine Fritz, Architect
AELS Board Chair



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Commerce, Community,
and Economic Development**

BOARD OF REGISTRATION FOR ARCHITECTS,
ENGINEERS, AND LAND SURVEYORS

P.O. Box 110806
Juneau, Alaska 99801-0806
Main: 907.465.1676
Toll free fax: 907.465.2974

April 14, 2023

The Honorable Jesse Sumner, Chair
House Labor & Commerce Committee
Alaska State Capitol, Room 421
Juneau, Alaska 99801
Sent via email to House.Labor.And.Commerce@akleg.gov

Dear Chair Sumner,

The Board of Registration of Architects, Engineers, and Land Surveyors (AELS) is providing this initial response to House Bill 159, "An Act relating to registered interior designers and interior design..." for your consideration in the House Labor & Commerce Committee. The bill adds the new profession of interior design to the responsibilities of the AELS Board.

Our Board met for a Special Meeting on February 24, 2023, to discuss our response to SB 73. SB 73 is identical to HB 159, so the discussion herein applies to HB 159 as well. Interior design registration has been a topic discussed by the Board for several years, especially the past two years with former HB 61.

We have also been monitoring the work of the Interior Design Working Group that began meeting in July 2022. This working group is comprised of four Alaskan architects and four interior designers who met five times to collaboratively address issues related to professional registration of interior designers. We understand that its work has not yet been completed, but as we explain in our attached commentary, its work product may be valuable for resolving at least some of the issues we raise. The AELS Board is currently polling its members to schedule another meeting soon to review findings of the Working Group to help us and you in considering HB 159.

We recognize your role is to develop the broader public policy positions and ours is to implement any legislation that is passed. However, we want to share our concerns with the Legislature and solve challenges together whenever possible. We continue to be dedicated to protecting the health, safety, and welfare of Alaskans through the design and construction of our built environments.

Thank you very much for your consideration.

Respectfully,

A handwritten signature in black ink that reads "Catherine Fritz".

Catherine Fritz, Chair
AELS Board

AELS Board

SB 73/HB 159 Issues of Concern

The AELS Board has reviewed SB 73 (which is identical to HB 159), compared it to legislation proposed in the previous Legislature, discussed its impacts at a special meeting on February 24, 2023, and offers these comments:

1. The definitions related to Scope of Practice in Sec. 32 (AS 08.48.341) seem excessively broad and detailed. Parts of this section include activities that are outside of normal Health, Safety, and Welfare of the public. Our Board's main purpose is to protect these. Definitions and responsibilities need to be clear for the specific practice of interior design as a profession that is separate from architecture and engineering. This will minimize conflict and reduce enforcement issues. Instead of much of this detail appearing in statute, we believe it more appropriately belongs in regulation and policy. Similar matters are dealt with in our Guidance Manual.
2. Many passages in the bill are not aligned with existing statutory language for other design disciplines. The Board has worked very hard to build consistency, and requests that interior design language be similarly integrated.
3. We are aware of the workload and other impacts of adding a new design discipline and two members to our Board. We have had extensive staff turnover during the past three years, both in operations and enforcement. The complexities of our multi-discipline board are substantial, and we are concerned about adding a new discipline without thoroughly understanding its impacts. Interior designers may be better served through another regulatory framework.
4. SB 73/HB159 relies on The Council for Interior Design Qualification (CIDQ) to determine the adequacy of a candidate's Education, Experience, and Examination. The Board currently has three national organizations it relies on to assess the adequacy of this 3-legged stool. Each has robust systems in place that include writing and administering exams, developing standards for practice, and evaluating educational adequacy. CIDQ would become a fourth. Does CIDQ appropriately align with Alaska regulations, and is it similarly rigorous and collaborative? An example of potential concern is exam eligibility. AELS regulations require the Board to review and approve candidates before examination. We understand that CIDQ's approval for a candidate's exam is granted without regard to the Board's actions. CIDQ has verbally indicated it could work with Alaska to satisfy this requirement, but we have not yet seen its formal proposed solution.
5. It is important to understand that SB 73/HB 159 establishes licensure for selected interior designers, referred to as "registered" through what is known as a "practice act,"⁻requiring that, unless exempted, anyone practicing interior design would be required to comply with statute and regulation, including education, examination, and experience. The more common framework for regulating interior design in the U.S. is through voluntary certification (approximately 27 states) while four jurisdictions regulate it through practice

acts (Nevada, Louisiana, Puerto Rico, and the District of Columbia). There are significant differences in regulated responsibility and authority in each jurisdiction, making it difficult to compare SB 73/HB 159 to the laws elsewhere. If SB 73/HB 159 were amended to certify interior designers through what is known as a “title act,” individuals who wish to use the title Interior Designer could be recognized through a voluntary process without being charged with health, safety, and welfare responsibilities in AELS statute and regulations. Although the AELS Board is not the body making public policy decisions like this, we suggest this might be an easier “first step” by proponents of the legislation.

6. At our May 2022 regular Board meeting, our chair recommended creating an Interior Design Working Group of architects and interior designers to meet to try to resolve these issues and produce recommendations. With leadership by interior designers, this group was formed, and we understand it met five times between mid-July and mid-November 2022, with more than 16 hours of discussion. However, we haven’t yet seen its work product and it appears it has not yet been incorporated into SB 73/HB 159. That work may answer many of the questions and concerns we have.

Clarification of Testimonies for HB159

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House Labor and Commerce Committee:

ASID Alaska is taking this opportunity to clarify several misinformed and inaccurate statements provided to the House Labor and Commerce Committee through written and public testimony during the hearing on the afternoon of January 31st.

First, concerning the AIA Alaska's written position that "*No other state in the country has a comparably onerous law in place, and some jurisdictions have removed interior design regulations after legal challenges*": currently, Louisiana and Nevada, as well as Washington, D.C., and Puerto Rico, are jurisdictions that have practice acts that are comparable to the proposal in HB 159/SB 73, as well as several Canadian provinces. The Oklahoma Legislature is also considering legislation that would convert their title act into a practice act, developed in collaboration and with the support of the Oklahoma Board of Architects, Landscape Architects, and Registered Commercial Interior Designers. Furthermore, the Nebraska Legislature just sent a bill to the Governor's desk that creates a registration for NCIDQ-certified interior designers, just as HB 159/SB 73 does.

The title unique to Oklahoma (registered commercial interior designer, not interior designer) satisfactorily addresses the legal challenges AIA AK mention in their position letter, wherein that case did find that reasonable regulation of the interior design profession was acceptable to protect the public, but the title of "interior designer" could not be regulated for freedom of speech concerns. In short, HB 159/SB 73 does not run afoul of any legal rulings on this issue, and the state (Florida) where the referenced case occurs **still regulates registered interior design**.

Second, Catherine Fritz's testimony expressed an uncertainty, on behalf of both the AELS Board and her own personal beliefs, about the "appropriateness" of interior design regulation and the impact of interior designers on public health, safety, and welfare. Fortunately, this question has already been answered by the Council for Interior Design Qualification and the National Council of Architectural Registration Boards (NCARB). NCARB is the national credentialing and regulatory organization that writes and administers the Architecture Registration Examination (ARE), required for architect licensure in all 55 U.S. jurisdictions. Much like CIDQ, NCARB's members are state regulatory boards, and the AELS board enjoys membership in NCARB and utilizes the ARE as a prerequisite for licensure in the state of Alaska.

In an effort to better understand the interior design profession's impact on public health, safety, and welfare, NCARB and CIDQ conducted a [thorough comparative analysis](#) of each organization's respective practice analyses and examination objectives to determine areas of similarity and dissimilarity between practitioner competencies. As a result, among the [key findings](#) is that "*While similar in practice and required knowledge, architecture and interior design are unique and distinct disciplines that both*

have an important role in protecting the health, safety, and welfare of the public within the built environment." These findings led to the adoption of "[unequivocal](#)" support for reasonable regulation of all [design professions](#), including interior design, by all the regulatory organizations administering licensure examinations for the design professions. In her testimony, Ms. Fritz made it clear that the protection of the public is the reason why the AELS Board, and indeed all regulatory boards, exists. We find it curious as to why the position of the AELS Board, which was mischaracterized in her testimony, is so misaligned with the national credentialing organization that writes the architecture licensure examinations and shares the AELS Board's mission to protect public health and safety. Perhaps the AELS Board would be willing to clarify why this misalignment exists and why its posture towards this policy more closely resembles the position of the Alaska component of the American Institute of Architects.

Fourth, regarding federal RFP language and the need for Registered Interior Designers to qualify for Department of Defense contracts: No matter whether an interior designer or architect, the Whole Building Design Guide (WBDG, updated in 2021), which encompasses the design requirements DoD, GSA, and other federal agencies must implement into their RFPs, has required that the individual providing interior services be NCIDQ-certified for the past two decades. Further, a registered architect without the NCIDQ does not satisfy that requirement which is precisely the reason some Alaskan architects have pursued NCIDQ certificate in recent years.

WBDG, Section 2-2: Design and review must be performed by professional interior designers or architects with significant interior design experience. Qualification of designers is based on education, experience, and examination. Interior designers or architects must have completed a program accredited by the Council for Interior Design Accreditation (CIDA) or equal accreditation program of academic training in interior design. For contracted services, the interior designer or architect must also have attained National Council for Interior Design Qualification (NCIDQ) certification or state licensure, certification, or registration, and must not be affiliated with a furniture dealership, vendor, or manufacturer.

Additionally, federal RFPs have become increasingly specific in the teaming requirements, with earlier RFPs requiring NCIDQ (late 90's, early 2000's), shifting to NCIDQ or Registered Interior Designer (mid-2000's), and more recently allowing only Registered Interior Designers. Not all projects see amendments removing the requirement to the solicitation.

Finally, though many Alaskan interior designers already provide services to federal agencies, we are not permitted to do so independently due to lack of registration in Alaska, which poses a barrier to practice and diminishes the Alaskan design community's competitiveness for these projects, many of which are interior renovations and improvements which sit squarely within the specific scope of work of a Registered Interior Designer proposed by HB159/SB73.

In addition to the jurisdictions noted above, many other US jurisdictions regulate interior design in a manner that satisfies the requirement for federal work including DoD contracts requirement (In total, 30 U.S. jurisdictions including practice acts noted above and title acts).

The workaround elsewhere is the same as how Alaskan firms have handled it. In states where regulation of interior design does not exist,

1. NCIDQ certified interior designers may provide their services under the oversight of the contracting agency's government architects,
2. NCIDQ certified interior designers may provide their services under the oversight of an architect registered in the jurisdiction of the project location, or
3. A registered architect pursues their NCIDQ certificate to satisfy both the registered professional requirement and the NCIDQ requirement to serve as the interior design DOR.

Thank you for your continued consideration on the issue of professional regulation of interior design. We hope this information provides some clarification to the concerns of the AIA and AELS Board.

Delay no more. The time is now. Please vote YES and pass HB 159/SB 73.