



## FEDERAL CONTRACTING REQUIREMENTS

Federal infrastructure dollars, often in the form of DoD projects, are vitally important to Alaska. DoD project teaming requirements are a hot topic. Plainly, if a project scope includes “Comprehensive Interior Design” then the Designer of Record for that scope must be NCIDQ certified in accordance with the Whole Building Design Guide and UFC 3-120-10. Further, fundamental RFP requirements for Key Personnel Capabilities and Experience have required for at least the past 8 years that all Designers of Record on a project must be registered, no matter the discipline.

The RFPs may or may not call out Registered Interior Designer as a required team member. That blatant requirement in the solicitation tends to be for projects that are interior tenant improvements (non-structural interior remodels, not a change of use, does not modify building egress systems but may modify egress within discrete interior areas of the building). However, most of the RFPs are for integrated teams and new construction or major renovations. No matter, because:

- All RFPs in AK the past 8+ years have required that all Designers of Record (DOR) be Registered Professionals (if not licensed in Alaska, then must also have minimum 5 years’ experience in our climate zone). The RFPs for integrated teams list architects outright because they’re required for the architectural scope. There are options to qualify the professional for the interior scope of work.
- All RFPs which include Comprehensive Interior Design (CID) in the scope reference the requirements of the Whole Building Design Guide and UFC 3-120-10 which mandate that the CID scope must be performed by an NCIDQ-certified architect or NCIDQ-certified interior designer who serves as DOR for the CID scope.
- The solicitation and the referenced requirements are not mutually exclusive. Rather, the most stringent combination of requirements applies, whether to the design team composition or for the design of the project itself.
- Thus the Designer of Record for the Comprehensive Interior Design scope of work may be
  - a Registered Architect who has passed the NCIDQ (only a few in AK)
  - a Registered Interior Designer (by definition has passed the NCIDQ; registered in another state b/c Alaska has no registration) with 5 years Alaska climate zone experience

Establishing professional registration in Alaska for qualified interior designers expands the pool of Alaskan design professionals that may compete for these DoD projects.

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US Army Corps  
of Engineers®

Contract  
Opportunity

General Information

Classification

Description

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History

 Follow

# JBE088 Joint Integrated Test and Training Center (JITTC), JBER, Alaska

 ACTIVE

Contract Opportunity

Notice ID  
W911KB23R0027

Related Notice

Department/Ind. Agency  
DEPT OF DEFENSE  
Sub-tier  
DEPT OF THE ARMY  
Major Command  
USACE  
Sub Command  
POD  
Office  
W2SN ENDIST ALASKA

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## General Information

**Contract Opportunity Type:** Solicitation (Original)

**All Dates/Times are:** (UTC-09:00) ANCHORAGE, ALASKA, USA

**Original Published Date:** Jan 31, 2023 09:44 am AKST

**Original Date Offers Due:** Mar 01, 2023 02:00 pm AKST

**Inactive Policy:** Manual

**Original Inactive Date:** Jan 31, 2024

**Initiative:**

- None

## Classification

**Original Set Aside:**

**Product Service Code:** C1BG - ARCHITECT AND ENGINEERING- CONSTRUCTION: ELECTRONIC AND COMMUNICATIONS FACILITIES

**NAICS Code:**

- 541310 - Architectural Services

**Place of Performance:**

## Description

JBE088 Joint Integrated Test and Training Center (JITTC), JBER, Alaska. This JBE088 JITTC AE Design contract is being procured in accordance with the Brooks A-E Act as implemented in FAR Part 36 and the supplements thereto. Firms will be selected for negotiation based on demonstrated competence and qualifications for the required work. This announcement is open to all businesses regardless of size. North American Industrial Classification System code is 541310, which has a size standard of \$12,500,000 in average annual receipts. A firm fixed price contract will be negotiated. The contract is anticipated to be awarded in April 2023 and design completed by August 2024, with follow on construction support through December 2026. To receive award

contractors must be registered in the System for Award Management (SAM). Register via the SAM Internet site at <https://www.sam.gov/SAM/>. If a large business is selected for this contract, it must comply with FAR 52.219-9 regarding the requirement for a subcontracting plan on that part of the work it intends to subcontract. The construction cost estimate is between \$100,000,000 and \$250,000,000. Award of the contract is anticipated for the third quarter of FY 23. Telephonic interviews will be held with all of the most highly qualified firms. All responders are advised that this contract may be revised or canceled at any time during the solicitation, selection, evaluation, negotiation and final award.

## Attachments/Links

### Links

Display Name	Updated Date
<a href="#">PIEE Solicitation Module Link for W911KB23R0027</a>	Jan 31, 2023
<a href="#">Web Based Training for the PIEE Solicitation Module</a>	Jan 31, 2023
<a href="#">Registration Instructions for the PIEE Solicitation Module</a>	Jan 31, 2023
<a href="#">Department of Defense Procurement Toolbox</a>	Jan 31, 2023

## Contact Information

### Contracting Office Address

CONTRACTING OFFICE KO 2204 3RD STREET

ANCHORAGE , AK 99506-0898  
USA

Primary Point of Contact

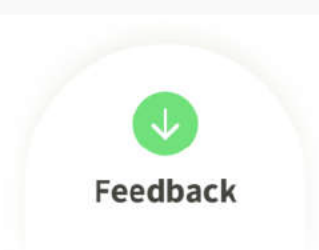
Tammy Davis  
✉ [tammy.davis@usace.army.mil](mailto:tammy.davis@usace.army.mil)  
☎ 9077515592

Secondary Point of Contact

Theresa Afrank  
✉ [theresa.m.afrank@usace.army.mil](mailto:theresa.m.afrank@usace.army.mil)  
☎ 907-753-2739

History

→ Jan 31, 2023 09:44 am AKST  
Solicitation (Original)



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**General Services Administration**

This is a U.S. General Services Administration Federal Government computer system that is **"FOR OFFICIAL USE ONLY."** This system is subject to monitoring. Individuals found performing unauthorized activities are subject to disciplinary action including criminal prosecution.

## GENERAL INFORMATION:

**Project:** JBE088 Joint Integrated Test and Training Center (JITTC), JBER, Alaska

**Solicitation Number:** W911KB23R0027

**Posted Date:** 31 January 2023

**Original Response Date:** 2 March 2023

**Classification Code:** C1BG

**Set Aside:** N/A

**NAICS Code:** 541310 -- Architectural Services

**Size Standard:** \$12.5M

**CONTRACTING ACTIVITY:** U.S. Army Corps of Engineers, Alaska District, P.O. Box 6898, JBER, Alaska 99506-0898.

### Description

**(1) CONTRACT INFORMATION:** This JBE088 JITTC AE Design contract is being procured in accordance with the Brooks A-E Act as implemented in FAR Part 36 and the supplements thereto. Firms will be selected for negotiation based on demonstrated competence and qualifications for the required work. This announcement is open to all businesses regardless of size. North American Industrial Classification System code is 541310, which has a size standard of \$12,500,000 in average annual receipts. A firm fixed price contract will be negotiated. The contract is anticipated to be awarded in April 2023 and design completed by August 2024, with follow on construction support through December 2026. To receive award contractors must be registered in the System for Award Management (SAM). Register via the SAM Internet site at <https://www.sam.gov/SAM/>. If a large business is selected for this contract, it must comply with FAR 52.219-9 regarding the requirement for a subcontracting plan on that part of the work it intends to subcontract. The subcontracting goals, which will be considered in the negotiation of this contract are: at least 25% of the contractor's intended sub-contract amount be placed with small businesses, with a minimum of 5% of that to small disadvantaged businesses, 3% to woman-owned small businesses, 1% to HUB Zone small businesses, 2% to veteran-owned small businesses and 1% to service disabled veteran-owned small businesses. The subcontracting plan is not required with this submittal but will be required with the fee proposal of the firm selected for negotiations.

The construction cost estimate is between \$100,000,000 and \$250,000,000. Award of the contract is anticipated for the third quarter of FY 23. Telephonic interviews will be held with all of the most highly qualified firms. All responders are advised that this contract may be revised or canceled at any time during the solicitation, selection, evaluation, negotiation and final award.

Funds are not presently available for this acquisition. No contract award will be made until appropriated funds are made available.

**(2) PROJECT INFORMATION:** Provide the design services to complete a design of the Joint Integrated Test and Training Center (JITTC). Services to be provided are related to the planning and preparation of design documents of the facility as well as support for construction (inspection and submittal review). The JITTC facility concept is an approximately 200,000 SF facility housing both secure and nonsecure training areas, secure, configurable, simulator areas as well as support equipment and other areas. The firm must have experience in design of facilities compliant with ICD 705 secure areas as well as design of facilities in full compliance with UFC 1-200-01. The AE and their subcontractors must have experience in cold regions design. Cold regions design is not considered to be a separate discipline that can be subcontracted. Rather, knowledge and experience in the design, construction and operation of facilities in arctic, subarctic, and cold region environments must be integral to all design disciplines. The AE will be required to participate in programming, value engineering studies, design Charrettes and project review conferences; participation may include facilitation, VE Study team, etc. The Government may require that designs be in metric and/or English systems of units. The firm must demonstrate the ability to provide drawings in AutoCAD (version as required by the project); have the capability to provide designs using building information modeling (BIM) software; use the latest version of M2 (cost estimating software furnished by the Government); provide a cost estimate in work breakdown structure (WBS); provide draft DD Form 1354, transfer and acceptance of military real property; provide electronic bid set (EBS) documents; and use SPECSINTACT. The AE will be required to use the

Dr. Check's design review and checking system. Systems information required for Dr. Checks includes a web browser program, Windows Internet Explorer (Microsoft) version 11.0 or later is recommended; the web site is <https://www.projnet.org/projnet/bin/KornHome/index.cfm>. The Government may require the AE provide engineering, testing, and design services during construction. The AE must provide the Government Construction Management and Design Staff with Fundamental and Enhanced Commissioning Services for the subject project. The Commissioning Services shall include individuals to serve as the Commissioning Authority on the project as described in the USGBC LEED Reference Guide 2009 Edition, Energy and Atmosphere Prerequisite 1 and Credit 3. These persons will support the Government in verifying contract compliance regarding the design, construction and initial post-occupancy phase of the project delivery as it relates to enhanced commissioning. The AE will prepare and review energy models prepared by others using DOE approved modeling software in accordance ASHRAE 90.1 Appendix G and UFC 3-400-01.

**(3) LOCATION/PLACE OF PERFORMANCE:** The JITTC facility will be located on JBER, Alaska.

**(4) SELECTION CRITERIA:** The following selection criteria are listed in the descending order of importance. Criteria (A)-(E) below are primary selection criterion. Criteria (F)-(G) below are secondary and will only be used as tie breakers among technically equal firms. Responding firms MUST address each discipline, clearly indicate which shall be subcontracted, and provide a separate SF330 (Part II) (07/2021) for each subcontractor.

**Primary Selection Criteria:**

(A) Professional Qualifications: Minimum requirements for professional personnel in the following disciplines: (Responding firms must address each discipline, clearly indicate which shall be subcontracted, and provide a separate SF330, Part II, for each subcontractor.):

- (1) In-house capability for Architect's and Registered Communications Designers with ten years post-graduate experience. An individual in each discipline must have been registered for six years.
- (2) A Commissioning Authority Certified by AGC, NEBB, BCxA, UvWM or TABB.
- (3) A registered fire protection engineer.
- (4) A registered interior designer.
- (5) A cyber security specialist with 10 years of experience.
- (6) A registered individual with 10 years of experience in design of secure spaces and / or facilities.
- (7) A registered mechanical engineer with 10 years of experience pertaining to both facility heating and ventilation as well as equipment and systems cooling.
- (8) A registered electrical engineer
- (9) A registered structural engineer.
- (10) A certified industrial hygienist.
- (11) A cost estimator.
- (12) A Certified Value Specialist (CVS)

Key design personnel must demonstrate training and specialized experience in cold regions design related to their specific discipline, as well as the ability to properly identify and address critical interfaces between related disciplines. Responding firms MUST address each discipline, clearly indicate which shall be subcontracted, and provide a separate SF330, Part II, for each subcontractor.



(B) Specialized experience and technical competence in:

- (1) Design of new facilities in cold regions. Cold regions design is not considered to be a separate discipline that can be subcontracted. Rather, knowledge and experience in the design, construction and operations of facilities in arctic, subarctic and cold region environments must be integral to all design disciplines.
- (2) Design of secure spaces, communication and intrusion detection.
- (3) Designs and studies conducted for low voltage systems including interior power, generators, uninterruptible power supplies and lighting systems. Designs and studies conducted for information management systems including exterior distribution, interior local area network and telephone systems. Designs and studies conducted for lightning protection.
- (4) Heating, piping including utility systems, ventilation, air conditioning and refrigeration systems.
- (5) Experience in BIM modeling and LEED energy consumption modeling.
- (6) Commissioning of Communications, Electrical and HVAC systems.
- (7) Sustainable design including energy modeling

(C) Past performance on DOD and other contracts with respect to cost control, quality of work, and compliance with schedules.

(D) Capacity to support facility design complete within 16 months from notice to proceed.

(E) Knowledge of locality.

#### **Secondary Selection Criteria:**

Criteria F-G are secondary and will only be used as tie-breakers among technically equal firms:

(F) Extent of participation of small businesses (SB), small disadvantaged business (SDB) concerns, women-owned small business (WOSB) concerns, HUBZone small business concerns, veteran-owned small businesses (VOSB) concerns and Service-Disabled Veteran-Owned small business (SDVOSB) concerns in the proposed contract team, measured as a percentage of the total estimated value of the acquisition, regardless of whether the SB, SDB, WOSB, HUBZone SB, VOSB or SDVOSB is a prime contractor, subcontractor, or joint venture partner, the greater the participation the greater the consideration.

(G) Volume of DOD contract awards in the last 12 months.

**5. SUBMISSION REQUIREMENTS:** Firms submitting their qualifications must include the following additional information as indicated: a) Part I, block c (11): include if previously worked with subcontractor and estimated percentage involvement for each team member; b) Part I, block F (24): include separate values for professional fee and construction for each project identified; and c) Part I, block H (3): address how your team meets each selection criterion. Include an organization chart of the key personnel to be assigned to the project. The 07/2021 edition of the SF330 MUST be used, and may be obtained from the Government Printing Office at: <http://www.gsa.gov/Portal/gsa/ep/formslibrary.do?formType=SF> or from commercial software suppliers for use with personal computers and laser printers in both Adobe Acrobat PDF and Form Flow formats. Part I-H of the SF 330, describe the firm's overall Design Quality Management Plan. A detailed contract-specific Design Quality Management Plan, which includes quality control and quality assurance plans, must be prepared for Government approval as a condition of contract award, but is not required with this submission. Part I of the SF 330 must be

submitted. It is preferred that Part II of the SF330 be submitted with Part I however, the Part II will be considered submitted if a current version (updated within the 36-month period prior to the date for receipt of submissions) of the Part II information has been uploaded to the SAM website.

Offerors must **provide** SF330 packages as **identified in the following paragraph** to be received no later than the date and time stated on the Synopsis Notice. Requests forwarded after this date will not be considered. No additional information shall be provided, and no faxed or e-mailed submittals shall be accepted. This is not a request for proposal.

Submittals shall be received electronically via email to [tammy.davis@usace.army.mil](mailto:tammy.davis@usace.army.mil) and [Theresa.m.afrank@usace.army.mil](mailto:Theresa.m.afrank@usace.army.mil) OR via the PIEE Solicitation Module website at: <https://piee.eb.mil/sol/xhtml/unauth/index.xhtml>. Search via Solicitation Number W911KB23R0027.

IN ORDER TO SUBMIT A PROPOSAL THROUGH THE PIEE SYSTEM, VENDORS MUST REGISTER IN THE PIEE SYSTEM AND MUST HAVE A PROPOSAL MANAGER ROLE ESTABLISHED. ADDITIONAL INFORMATION REGARDING PROPOSAL MANAGER, PROPOSAL MANAGER FUNCTIONS AND POSTING OFFERS CAN BE FOUND AT <https://piectraining.eb.mil/wbt/xhtml/wbt/sol/solicitation/proposals.xhtml>

**Submittals shall be received no later than 2:00 PM AKST 02 March 2023.** Any submittals received after this date will not be considered. No additional information shall be provided, and no faxed, e-mailed, or hand delivered submittals shall be accepted. This is not a request for proposal.

**QUESTIONS: BIDDER INQUIRIES MUST BE SUBMITTED NLT COB 23 February 2023 VIA BIDDER INQUIRY IN PROJNET**

Technical inquiries and questions relating to proposal procedures are to be submitted via Bidder Inquiry in ProjNet at [www.projnet.org](http://www.projnet.org).

1. To submit and review bid inquiry items, bidders will need to be a current registered user or self-register into the system. To self-register, go to the aforementioned web page and click on the BID tab. Select Bidder Inquiry, select agency USACE, and enter the Bidder Inquiry Key for this solicitation listed below, your email address, and then click login. Fill in all required information and click create user. Verify that information on next screen is correct and click continue.

2. From this page, you may view all bidder inquiries or add inquiry.

3. Bidders will receive an acknowledgement of their question via email, followed by an answer to their question after it has been processed by our technical team.

4. The Solicitation Number is: **W911KB23R0027**. The Bidder Inquiry Key is: **FA7Y89-PHYKAV**. The Bidder Inquiry System will be unavailable for new inquiries seven (7) prior to proposal submission in order to ensure adequate time is allotted to form an appropriate response and amend the solicitation if necessary. Offerors are requested to review the Bidder Inquiry System for answers to questions prior to submission of a new inquiry. The call center operates weekdays from 8AM to 5PM U.S. Central Time Zone (Chicago). The telephone number for the Call Center is 800-428-HELP. All questions should be submitted utilizing the USACE Bidder Inquiry System, ProjNet. Questions sent via e-mail will not be answered.

All potential offerors are advised to check daily the PIEE Solicitation Module website at: <https://piee.eb.mil/sol/xhtml/unauth/index.xhtml> via Solicitation Number Search W911KB23R0027, for any additional modifications pertaining to this synopsis.

This contract is being procured in accordance with the Brooks A-E Act, as implemented in FAR Subpart 36.6. **THIS IS NOT A REQUEST FOR PROPOSALS.**

#### **Place of Performance**

Address: US Army Corp of Engineers, Alaska District, CEPOA-CT, P. O. Box 6898, JBER, AK 99506-0898

**Contracting Division Points of Contact:**

Tammy Davis – Contract Specialist - [tammy.davis@usace.army.mil](mailto:tammy.davis@usace.army.mil)

Theresa Afrank – Contracting Officer – [Theresa.m.afrank@us.army.mil](mailto:Theresa.m.afrank@us.army.mil)

**Testimony to the Alaska Legislature**  
**House Finance Committee**  
**Regarding CS For Sponsor Substitute for SB54, Version D**  
**May 17, 2025**  
**Page 1**

Co-Chairs Foster, Josephson, and Schrage and members of the House Finance Committee:

For the record, my name is Colin Maynard, I am a retired Civil and Structural Engineer and am a member of the Alaska State Board for Registration of Architects, Engineers, and Land Surveyors (or AELS). I am testifying at the direction of the Board as the Chair of the AELS Legislative Liaison Committee.

At our February 2025 meeting, the AELS Board voted 7-2 to support this bill. At the April 9, 2025, meeting, we voted 8-1 to support the amendments made in Senate Finance.

I have to first say that the Board is proud to see that the Legislative Audit found that the Board has been complying with the relevant statutes and regulations and is performing its duty to protect public safety, health, and welfare. We believe that an extension of eight years is warranted.

Now to address a few provisions which might have financial impacts:

- Section 2 – Board makeup
  - Adding petroleum and chemical engineering disciplines to the mining engineering seat as an option, instead of a fallback position, expands the pool of possible volunteers from 36 to 148 while keeping the seat in the resource extraction industry. This does not add any cost.
  - Breaking the current mechanical/electrical engineering seat into two seats recognizes that they are the two most common disciplines after civil engineering, even more than architects or land surveyors, which have two seats each. It also recognizes that these disciplines are different from each other and expecting one person to have expertise in both is asking a bit much. There has been testimony in previous hearings that this problem was solved by a statute change several years ago, yet we still do not have both a mechanical and electrical engineer on the Board. We have a third civil engineer instead.
  - Adding an Interior designer seat will allow someone with expertise in that field to help craft regulations regarding that new discipline.
  - We understand that we are already one of the largest State licensing Boards, but we currently regulate eighteen different disciplines with more registrants than all but two Boards. Most of our meetings are done virtually and the cost of travel is minimal. In addition, the cost of the Board is borne by those registrants, not by the public.

**Testimony to the Alaska Legislature**  
**House Finance Committee**  
**Regarding CS For Sponsor Substitute for SB54, Version D**  
**May 17, 2025**  
**Page 2**

- Section 4 – Executive Administrator salary
  - The Board has been having problems retaining our Executive Administrator. The Board has been working with the Division and Department to get an Office of Management and Budget class evaluation for years. The fact that the position is a class of one has not made that very easy and it has dragged out for years. The evaluation finally started last fall, still has at least one more step to go, and may not have a conclusion with which the Board agrees. Before the evaluation started, the Board decided to request that our statute specify that the AELS Executive Administrator has a salary in Range 23. Other Boards that have a similar number of registrants have a similar provision.

Most of the costs in the fiscal note are based on the addition of a licensing examiner, thereby expanding the Board's staff from three to four: an executive administrator, two licensing examiners, and an investigator. This is necessary due to the existing workload. The addition of interior designers will add about 1% to the number of registrants. The costs will be borne by the approximately 6700 active registrants and 800 Corporations and Limited Liability Companies.

Thank you for your consideration of this bill, I will send a copy of my testimony to the committee email address, and am willing to try to address any questions you might have.



May 9, 2025

Dear House Finance Chairs and Members,

Thank you for this opportunity to update you on our current position on SB54. AIA Alaska worked with bill sponsor Senator Claman to address our primary concern of previously proposed interior design legislation. We appreciate that SB 54 is offered as a Title Act with permitting privileges, rather than a Practice Act.

**While we do not feel that any regulation of interior design is necessary, if the legislature chooses to enact legislation, establishing a Title Act is something we can live with. A Title Act is the essential condition for AIA Alaska to remain neutral on SB54. AIA Alaska does not support interior design registration through a Practice Act.**

During committee testimonies and the Senate Floor presentation of SB54, we heard incorrect information about the need for this legislation because of federal contracting requirements. It was stated that interior designers must be registered to compete for federal contracts, and that SB54 will resolve a current practice of hiring non-Alaskan interior designers. **This is not true.** State registration is one way to meet minimum federal qualifications. Another is to hold the NCIDQ certification, which is already held by the Alaskan interior designers who support SB54. While this point does not affect the nature of this bill as a Title Act or Practice Act, we felt it was essential to correct the record as legislators consider SB54 holistically. I have attached AIA Alaska's White Paper on this topic for more information.

In response to questions at the House Labor & Commerce Committee as to the number of Alaskan NCIDQ certification holders, the Council for Interior Design Qualification's website indicates 23 active certification holders: <https://cidq.learningbuilder.com/Public/MemberSearch/Verification>. These are the people who will be eligible to become registered through SB54.

Again, thank you for your ongoing attention to this topic and for your service to our state.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Cederberg".

Jessica Cederberg, AIA, NCARB  
2025 AIA Alaska Past President

Cc: Senator Matt Claman  
Dianne Blumer



WHITE PAPER: SB54  
RE: FEDERAL PROCUREMENT OF  
INTERIOR DESIGN SERVICES  
Issued: April 29, 2025

**Competing for federal contracts does NOT require professional registration of interior designers.** While some federal agency solicitations encourage or require minimum qualifications of interior designers, there is **NO requirement for state registration** (aka license to practice interior design).

The relevant document that establishes minimum qualifications is the Unified Facilities Criteria (UFC) system. It can be accessed online at

[https://www.wbdg.org/FFC/DOD/UFC/ufc\\_3\\_120\\_10\\_2018\\_c2.pdf](https://www.wbdg.org/FFC/DOD/UFC/ufc_3_120_10_2018_c2.pdf)

**UFC SECTION 2-2 INTERIOR DESIGNER QUALIFICATIONS.**

“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.

The Alaskan interior designers that are promoting SB54 already have the NCIDQ certification that is required to work on federally funded military projects, and many interior designers have completed such projects as evidenced in their portfolios of work.

**Questions and discussions are welcome and encouraged!** Please contact **AIA Alaska**, attention: Jessica Cederberg, 2025 Past President (907) 227-4943 or [contact@aiaalaska.org](mailto:contact@aiaalaska.org)

May 17, 2025

Dear Co-Chairs and Members of the House Finance Committee,

I've been an active member of the Alaska Chapter of the AIA that currently has a neutral position on SB54 because of its premise as a Title Act. Just to be clear, **AIA does not support SB54.**

Today I am testifying as an individual and asking that you amend SB54 by removing Section 3 that adds 2 seats to the AELS Board.

I served on the Board for 8 years; 2 years as Chair. The Board is already our state's largest, and while it oversees more than 6,500 registered design professionals, there are many commonalities between the disciplines, especially the 15 branches of engineering; it is not necessary or practical for every discipline to be on the Board.

SB54 increases the board size by providing separate seats for mechanical and electrical professions. **This is unnecessary.** In 2023, through SB126, a former restriction that did not allow mechanical and electrical to serve simultaneously was removed. SB126 also allowed more work to be delegated to the AELS staff, which has reduced the Board's workload. This is another reason that increasing the Board size is unnecessary.

The bill also dedicates a new seat to a registered interior designer. There are currently only 23 Alaskan interior designers with the credential to be eligible for registration, so there will be a very small pool to draw from for Board service. But my bigger concern is the inappropriateness of an interior designer to serve on the Board since they will be regulated through a Title Act. A seat on the Board gives authority and responsibility for all of the regulated **practices** of engineering, architecture, etc. **A seat for interior design is not appropriate since it will not be regulated as a practice itself.**

In 1998, when landscape architecture was added to the Board, a temporary seat was made to provide expertise for regulation development. This could be a practical compromise to consider for SB54.

If the legislature feels it's necessary to license interior designers, then I urge you to consider the **least restrictive and most efficient provisions possible.** Based on my 35 years as a registered architect, I just cannot think of any need to increase the cost and operational complexities that will result from expanding the AELS Board size. **Please amend SB54.**

A final note - In light of the Governor's recent Administrative Order that freezes the development of new regulations (which will be required if this bill is passed), I ask that you consider **delaying action** until the state is better able to take on the additional workload created by this bill.

Thank you, sincerely, for your time today.

*Catherine Fritz*, Architect



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**From:** Dana Nunn <dnunn@bettisworthnorth.com>  
**Sent:** Saturday, May 17, 2025 6:34 PM  
**To:** Rep. Jamie Allard; House Finance  
**Subject:** SB54 - written testimony  
**Attachments:** 25-01-28 AK SB54 - Federal Contracting Requirements.pdf

Rep. Allard,

Thank you for asking such insightful questions and voting to advance the bill from committee. I wanted to provide some clarifications on your questions regarding precedent in other states for regulating the profession of interior design and of regulating it with a combined board, what interior designers do, and of the DoD requirements.

### **PRECEDENT – REGULATION OF INTERIOR DESIGN**

With the recent advancement of interior legislation to law in Nebraska, there are now 31 US jurisdictions and 8 Canadian provinces which regulate interior design. Of those, 18 jurisdictions and 8 Canadian provinces allow qualified interior designers to practice independently with stamp and seal privileges.

Louisiana, Nevada, Oklahoma, Washington, D.C., and Puerto Rico, as well as many Canadian provinces have practice acts. Regulation of the title (registered interior designer, not interior designer) is the minimum level of regulation in the 31 U.S. jurisdictions that have legal recognition for the interior design profession.

### **PRECEDENT – COMBINED BOARD**

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 their complementary focus on advocating on behalf of the public protection role their regulatory boards play. As nonprofit associations, membership in ICOR 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, much like the AELS oversees all design professions currently regulated in Alaska.

In May 2023, the ICOR published a joint statement, **“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.”** The joint statement concluded, “Oversight of these professions is essential to protecting the public’s health, safety, welfare, while minimizing the risks associated with technical design professions.”

Including interior design under the same body offers operational efficiency and regulatory consistency across disciplines.

### **IMPACT OF INTERIOR DESIGN ON HEALTH, SAFETY, AND WELFARE**

Several aspects of practicing interior design relate directly to the health, safety, and welfare of building occupants including:

- Successfully applying building, fire, and other safety codes
- Ensuring accessibility for the physically disabled in conformance with the Americans with Disabilities Act and other state and local laws
- Means of egress, space planning, and safe wayfinding
- Performing occupancy calculations
- The movement, inclusion, or elimination of non-loadbearing interior walls and partitions
- Location, size, and performance requirements for fire-rated partitions and doors
- Location, detailing, and performance requirements of interior finishes and furnishings to satisfy flame and smoke propensity requirements
- Mounting heights and locations of fire extinguisher cabinets and ensuring clear access
- The selection of surface materials in walking paths to provide appropriate traction determined by Dynamic Coefficient of Friction (dCOF) to reduce slips, trips, and falls

- The selection of finishes, building equipment, and materials that contribute to good health, healing, and well-being

Most of these activities are regulated by the building code and require a building permit before construction can begin.

States have passed these codes and policies in the wake of disasters such as a casino fire in Nevada and a nursing home fire in Virginia, where the makeup of the building's interior exacerbated the spread of the fire and the loss of life. Events such as this can be mitigated through regulation of the profession.

## FEDERAL CONTRACTING REQUIREMENTS

Federal infrastructure dollars, often in the form of DoD projects, are vitally important to Alaska. In accordance with the Whole Building Design Guide and UFC-3-120-10, if a project scope includes "Comprehensive Interior Design" then the Designer of Record for that scope must be NCIDQ certified.

For at least the past 8 years, fundamental RFP criteria for Key Personnel Capabilities and Experience have required that all Designers of Record on a project must be registered, no matter the discipline.

The RFPs may or may not call out Registered Interior Designer as a required team member. That blatant requirement in the solicitation tends to be for projects that are interior tenant improvements (non-structural interior remodels, not a change of use, does not modify building egress systems but may modify egress within discrete interior areas of the building). However, most of the RFPs are for integrated teams and new construction or major renovations. No matter, because:

- Majority of RFPs in AK the past 8+ years have required that all Designers of Record (DOR) be Registered Professionals (if not licensed in Alaska, then must also have minimum 5 years' experience in our climate zone). The RFPs for integrated teams list architects outright because they're required for the architectural scope. There are options to qualify the professional for the interior scope of work.
- All RFPs which include Comprehensive Interior Design (CID) in the scope reference the requirements of the Whole Building Design Guide and UFC 3-120-10 which mandate that the CID scope must be performed by an NCIDQ-certified architect or NCIDQ-certified interior designer who serves as DOR for the CID scope.
- The solicitation and the referenced requirements are not mutually exclusive. Rather, the most stringent combination of requirements applies, whether to the design team composition or for the design of the project itself. The requirements are *additive*.
- Thus, the Designer of Record for the Comprehensive Interior Design scope of work may be
  - a Registered Architect who has passed the NCIDQ (only a few in AK)
  - a Registered Interior Designer who, by definition, has passed the NCIDQ; such a designer must be registered in another jurisdiction because Alaska currently has no registration; minimum 5 years Alaska climate zone experience is generally required for any DOR registered in a state other than Alaska

I obtained the NCIDQ certification early in my career and immediately pursued registration many years ago in order to serve as the DOR for interior design work on DOD work when the RFP required it. As one of only a few NCIDQ-certified interior designers in Alaska that also hold professional registration, I have served as DOR for the Comprehensive Interior Design scope as a subconsultant to firms other than my own when the RFP required an interior design DOR, and I have declined similar opportunities when my own projected workload capacity was incompatible with yet another DOD contract. As director of a larger interior design team, I required both NCIDQ and professional registration as qualifications for a senior interior design position I filled recently, enabling our team to be more competitive as we continue to see the need increase, particularly with the influx of infrastructure dollars.

Establishing professional registration in Alaska for qualified interior designers expands the pool of Alaskan design professionals that may compete for these DoD projects.

## CONCLUSION

Interior designers qualified through education, experience, and examination should not be precluded from practicing to the fullest of our abilities due to overlapping scope with related design professions. Our increasingly complex world demands that integrated interdisciplinary teams of professionals with specialized expertise come together to design our communities for lasting impact. Much like our allied colleagues with shared competencies in structural and civil engineering, landscape architecture, and architecture, interior designers add depth and breadth of specific knowledge, skills, and abilities to collaborate and more effectively and efficiently address modern challenges.

SB54 provides public safety protection and risk mitigation in Alaska's buildings, expands consumer choice of qualified design professionals, ensures unrestrained trade, increases professional employment opportunities, attracts high quality design talent to Alaska, encourages Alaskan students to return home for career opportunities, and ensures Alaska remains competitive on federal projects.

Thank you for maintaining an open mind as you contended with this issue over what has been a few seasons, now. I welcome the opportunity to show you the impact of interior designers on public health, safety, and welfare, in the buildings you enter and enjoy, when you're back in South Central Alaska following the session.

You're in the home stretch! Thank you for your continued service to Alaska and Alaskans.

Respectfully,  
Dana Nunn  
Anchorage, Alaska, District 15-H

**Dana Nunn, FASID, IIDA, NCIDQ, CCS, LEED AP, WELL AP, RID (TX) | Interior Design Director**

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**BETTISWORTH  
NORTH**



*NCIDQ #021025*

*Texas Registered Interior Designer #10787*

*ASID Alaska Advocacy Committee Chair*

*IIDA Northern Pacific chapter, Director of Alaska Advocacy*

*CIDA Site Visitor Volunteer for Interior Design Accreditation*

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**From:** Barbara Cash [REDACTED]  
**Sent:** Saturday, May 17, 2025 5:19 PM  
**To:** House Finance  
**Subject:** SB54 Federal Solicitation Requiring Registered Interior Designer  
**Attachments:** DOD JITTC JBER\_Request For Proposals (1).pdf

House Finance Committee

Pursuant to our SB54 discussion, Attached is a copy of a large Federal Project Solicitation at JBER from 2023-24 requiring a Registered Interior Designer. These solicitations do exist.  
Please see attachment with highlight on page 7.

Thank you,  
Barbara

**Barbara Cash, FASID, IIDA, NCIDQ**  
Interior Designer  
[REDACTED]

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**From:** Melissa W. [REDACTED]  
**Sent:** Saturday, May 17, 2025 5:16 PM  
**To:** House Finance  
**Subject:** Please Pass SB54

Afternoon Co-Chairs Foster, Josephson, and Shrage and members of the committee:

As an Eagle River resident and a dedicated commercial interior designer preparing for the NCIDQ certification, I am writing to express my strong support for SB54. I respectfully urge you to pass SB54, which seeks to extend the AELS Board and establish a registration process for interior designers.

Thank you for your attention to this important matter.

Sincerely,  
Melissa Wiltfong

Eagle River resident