

House Finance Committee

Dear Kelly,

I'm writing to ask you to **please support HB 61 Professional Registration for Commercial Interior Designers.**

Since you know me personally, you are aware that I'm a 43-year resident of Alaska. I was born in Anchorage and have lived in Eagle River for the last 17 years. I am a commercial interior designer by profession, so HB 61 is very important to me.

After college, I rigorously studied for, and passed, the National Council for Interior Design Qualification (NCIDQ) series of exams, which is the industry's recognized indicator of proficiency in interior design principles. Through certification, designers show a high level of commitment to the interior design profession, proven knowledge of current standards established to protect public health, safety, and welfare, and mastery of aesthetic considerations.

My job is to design aesthetically pleasing spaces, sure, but it is so much more than that and goes way beyond selecting paint colors and furniture. We design spaces following current code(s) that have been adopted by the Authorities Having Jurisdiction, and life safety is our primary goal. Recently, I have dealt with the following issues in my daily work:

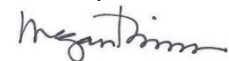
1. Worked with Municipal plan reviewers, inspectors, and contractor to replace incorrect firestopping that was used to seal gaps around conduit going through the floor slab, which is a fire rated assembly. I researched UL listed assemblies and the International Building Code to see the requirements for our conditions and worked with all parties to find a solution for our situation that met code.
2. I worked with a physicist to ensure that lead shielding in walls/doors/windows was appropriate to provide protection from radiation in a hospital where new CT Scanning equipment was being installed.
3. Reviewed tenant spaces and identified areas where the floorplans didn't meet current code for egress requirements and provided solutions to rectifying the situation.
4. Assisted a client with submitting applications to childcare licensing and the health department for a live-in care facility. To satisfy licensing requirements, building revisions were required for the safety of the children and ultimately, a sprinkler system was installed. Additionally, steps were installed to allow children to reach the windowsill height for emergency egress if needed.
5. Provided preliminary drawings for converting five patient rooms in a local hospital to Airborne Infection Isolation Rooms (AIIR), which are single-occupancy patient-care room used to isolate persons with a suspected or confirmed airborne infectious disease. These rooms were also designed to accommodate bariatric patients.

As you can see from the above list, my typical workday is more than picking finishes and throw pillows for clients. HB 61 Registration for commercial interior designers will:

1. Be voluntary: non-registered interior designers may work in the residential field (single to 4-plex) or in the commercial field under a registered commercial interior designer or architect
2. Be compatible with all design professions: architects will be exempt from this registration
3. Be considered self-funded through the existing AELS Registration Board fee structure
4. Provide a professional stamp for interior non-bearing construction document permitting giving registered commercial interior designers direct responsibility for their own work

It should be noted that projects for the U.S. Government require a NCIDQ certified designer OR a state and/or jurisdiction certified, registered, or licensed interior designer to be part of the design team for most renovation and new construction projects. **If our national government recognizes the importance of qualified interior designers as part of a construction design team and requires designers to be certified, registered, or licensed, then the State of Alaska should follow suit.** I appreciate your consideration on this matter and look forward to being one of the first Registered Commercial Interior Designers in the State of Alaska.

Sincerely,



Megan T. Lierman, SALT LLC

Eagle River, AK 99577

 / [mlierman@salt-ak.com](mailto:mlierman@salt-ak.com)



## Alaska Professional Design Council

PO Box 240753  
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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 Council of  
Engineering Companies  
of Alaska (ACEC)

American Society of  
Interior Designers,  
Alaska Chapter (ASID)

Institute of  
Transportation  
Engineers, Alaska  
Section (ITE)

Structural Engineers,  
Alaska (SEAAK)

February 1, 2022

### APDC Position Statement on HB61 – Licensure of Commercial Interior Designers

The Alaska Professional Design Council (APDC) is a non-profit corporation that represents the common interests of Alaska's design professionals. Our members include engineers, land surveyors, landscape architects and interior designers that live and work throughout the state of Alaska.

APDC supports the licensure of Commercial Interior Designers. The discipline has been around for decades. This licensure, like all disciplines covered by the Board of Architects, Engineers, and Land Surveyors, will only be granted to those who have shown minimal competence via education, experience and examination. This includes getting a degree in Interior Design at an accredited university, experience under a licensed Commercial Interior Designer, and passing the nationally recognized examination. This will allow Commercial Interior Designers to take responsibility for their own work and stamp their own designs where public safety is affected, instead of having to hire an architect to do that for them.

The only opposition to this bill comes from architects, who have made various claims in defense of their position:

#### *Architects already do this work:*

Licensure is a system to protect the public, not as turf protection. If qualified Commercial Interior Designers have the capability of safely executing the limited scope of work as defined by statute, they should be allowed to do so. In addition, this bill will not prevent architects from continuing to practice interior design. Some Civil Engineers and Architects opposed licensure of Landscape Architects over 20 years ago with similar arguments. The Legislature decided not to protect their turf.

#### *Architects have much more rigorous education and testing requirements:*

A joint report recently published by the National Council of Architectural Registration Boards (NCARB) and the Council for Interior Design Qualification (CIDQ), the entities responsible for architecture and interior design examination standards, conducted a practice analysis of the two disciplines and found that both address fundamental competencies including occupancy, accessibility, exiting, and fire separations, but are unique in other areas of expertise. Architects are also responsible for site design, exterior enclosures, roofing systems, and many other issues not covered by Interior Designers. Interior Designers are not trying to practice architecture, so should not be held to the same content standards of professional expertise, while still being evaluated, using a similar system to the architects, for their competency to do the work that they will be doing.

The same joint report found both the "ARE and the NCIDQ Examination are entirely devoted to assessing knowledge and skills related to health, safety, and welfare."\*

\*(Source: A Comparison of Practice Analysis Defined Competency Requirements for the Architecture and Interior Design Professions and A Comparison of Examination Objectives of the Architect Registration Examination® (ARE®) and the NCIDQ® Examination, December 2021)

*Architects have always retained the responsibility for interior design:* Not necessarily true. There are many Interior Designers who have worked independently on projects where the public safety is not an issue. They will continue to do so if this bill passes. However, if the project is in a commercial building and modifies any of the systems where public safety is an issue, the current regulations would require an architect to stamp the Interior Designer's drawings or produce a redundant set of drawings. This is an unnecessary cost to the client, as Interior Designers are educated and tested on the public safety issues related to commercial interior design.

*Licensing Interior Designers would confuse the public and lead to less accountability (while still allowing the Interior Designers to continue to practice):*

This claim has no validity, as the public probably does not know the lines between architecture and interior design now. Licensing Interior Designers will shift responsibility, not reduce it. A licensed design professional will be liable for errors or omissions in their designs, just like now. However, as there will only be one licensed design professional involved, the responsibility will be clearer.

*Licensing Interior Designers will create a financial burden on the public:*

Quite the opposite is true. Interior Designers will be part of the AELS Board, which is required to be self-sufficient. It is funded by licensing fees, application fees, and examination fees. The General Fund will not be affected by this additional license. In addition, clients will not have to pay for the redundant services of an architect, where they are not necessary.

*Architects will have to hire interior designers, which the project can't afford:*

Architects can and do practice interior design now and will be able to do so after this bill passes. They do not need to hire an interior designer. However, many architects already do so, relying on interior designers for their specialized expertise in areas such as space planning, furniture selection, accessibility, flame/smoke performance of interior finish and furnishings materials, and wayfinding. It is up to the owner and architect, whether an interior designer is added to the team. Currently, an interior designer has no option but to needlessly hire an architect if public safety issues are affected on a project, even though they are qualified to do the work without one.

*Owners will have to hire licensed Commercial Interior Designers to move cubicles or change out carpet:*

Owners may do as they like, however interior designers of public-occupancy buildings may not alter fire exiting or select interior finish materials without being registered or working under supervision of a registered Commercial Interior Designer or Architect. Alternately, one could be retained as necessary to provide supervision, and make sure that mistakes are not being made. A full-blown permit set of drawings would not likely be required in the cited instances.

*Current interior designers working independently from architects who select furnishings, fixtures, and equipment will have to become licensed:*

Only interior designers providing the public safety services outlined in HB 61 within public-occupancy buildings will have to become registered or work under a registered Commercial Interior Designer or Architect. This statute, and the regulations promulgated under it, will mirror the requirements for all the other professional design disciplines. Merely selecting furnishings, fixtures, or equipment may not fall under the provisions of this act. Interior designers in the residential field (single-family to 4-plex, with restrictions) are unaffected by this bill.

April 11, 2022

Dear Representative Merrick,

## **Please Support HB 61 Professional Registration for Commercial Interior Designers**

We are reaching out again in support of HB 61.

HB 61 is very important to our firm. Interior designers qualified through education, experience and national examination to protect public safety in commercial buildings should be allowed to practice the full scope of commercial interior design and take responsibility for their own work. Here's why we support HB 61:

Commercial interior designers in public-occupancy buildings directly impact public health, safety and welfare in most aspects of their work and are educated, trained, and tested to do so.

Public-safety services include:

1. Design of interior non-bearing wall & ceiling configurations: occupant load analysis, number and location of internal exits, path of travel distance & width, accessibility in suites & to exits
2. Design/specification of interior finish materials, furnishings & fixtures which require knowledge of the following: infection mitigation & control, combustibility, flame spread, smoke density, propagation, slip resistance coefficient
3. Development of interior construction documents addressing applicable code, regulation, and guideline requirements; fire detection/suppression device location coordination

### **HB 61 Economic Benefits to Alaskans:**

1. Expands consumer choice of qualified design professionals and encourages small business
2. Increases professional employment and salary opportunities motivating high-quality design talent to remain, or relocate to Alaska, helping reduce the professional workforce gap
3. Encourages hiring Alaskans instead of "outside experts" for professional interior design, and those earning interior design degrees "outside" to return home for professional registration

### **HB 61 Registration for commercial interior designers will:**

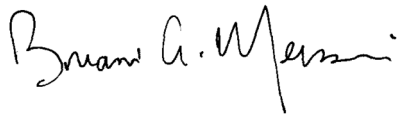
1. Be voluntary: non-registered interior designers may work in the residential field (single to 4-plex) or in the commercial field under a registered commercial interior designer or Architect
2. Be compatible with all design professions; Architects will be exempt from this registration

3. Be considered self-funded through the existing AELS Registration Board fee structure
4. Provide a professional stamp for interior non-bearing construction document permitting giving registered commercial interior designers direct responsibility for their own work

**Public safety protection and effective COVID-19 response.** Commercial Interior Designers are at the forefront, developing new strategies to implement essential infection mitigation and control in public spaces, and surface/material cleaning-disinfecting protocols for occupant safety.

**Please support HB 61 Registration for Commercial Interior Designers** to protect public safety, expand consumer choice of qualified design professionals, advance infection mitigation in public spaces, and bring economic benefits to Alaska.

Sincerely,



Brian Meissner, AIA, PMP, LEED AP  
Principal, ECI



Jason Swift, AIA, LEED AP  
Principal, ECI



Justin Scanio, AIA  
Principal, ECI

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



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**From:** Dana Nunn <dnunn@bettisworthnorth.com>  
**Sent:** Saturday, March 12, 2022 1:34 PM  
**To:** Rep. Kelly Merrick  
**Subject:** Support HB61 Registration for Commercial Interior Designers

Dear Representative Merrick,

**Please Support HB 61, Registration for Commercial Interior Designers**

My name is Dana Nunn. I am a nearly 19-year resident of Anchorage and a NCIDQ-certified commercial interior designer.

**HB 61 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 to do.

**Commercial interior designers of public-occupancy buildings directly impact public health, safety, and welfare in most aspects of their work.** Commercial 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:

- Development of interior technical submissions (i.e., plans, specifications, contract documents) in compliance with applicable building codes, fire codes, and accessibility standard, relating to space planning, finish materials, furnishings, fixtures, and equipment, and the preparation of documents relating to interior construction that does not affect the engineered systems of a building.
- 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: infection mitigation and control, combustibility, flame spread, smoke propagation, toxicity, slip resistance

**HB 61 Registration for commercial 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 commercial 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 self-funded through the existing AELS Registration Board fee structure.
- Provide a professional stamp for interior non-bearing construction document permitting, giving registered commercial interior designers direct responsibility for their own work which currently must be supervised and over-stamped by a registered architect.

**HB 61 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 work in the realm of publicly occupied buildings. It is generally not feasible to practice commercial interior design in Alaska since any project requiring plan review and construction permit would 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.



- 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.

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 commercial 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.

This point is particularly relevant in my experience. There are no interior design programs in Alaska, so aspiring designers must leave Alaska to pursue their degree. New interior design graduates consistently waver about coming (back) to Alaska and cite career opportunities and potential for advancement as concerns vs. other desirable and comparable destinations. As director of an interiors team that is growing despite Alaska’s economic challenges, it has been increasingly difficult to attract talent to Alaska when career potential is limited.

My concern for workforce development has only increased in the last several months. The design professions face a shortage of talent amongst all disciplines at all levels nationwide and the pandemic 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.

**Please support HB 61 Registration for Commercial Interior Designers** to protect public safety, expand consumer choice, and bring economic benefits to Alaska. [Help Alaska join 27 other states that regulate interior design!](#)

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

Sincerely,  
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**BETTISWORTH  
NORTH**

