

From: [REDACTED]
To: [Rep. Matt Claman](#)
Subject: HB61 - REGISTER COMMERCIAL INTERIOR DESIGNERS - Oppose
Date: Tuesday, March 15, 2022 8:16:55 AM

Good Morning,

I am writing in regards to HB 61, an Act relating to commercial interior designers and commercial interior design; establishing registration and other requirements for the practice of professional commercial interior design; relating to the State Board of Registration for Architects, Engineers, and Land Surveyors; relating to liens for labor or materials furnished; relating to the procurement of commercial interior design services; and providing for an effective date.

I'm opposed to this proposed change of registration for commercial interior designers. My initial thought is I don't see how this further benefits public health and safety that Architects, Engineers, and Land Surveyors already are capable of providing. Secondly, interior commercial design I believe should already exist in the purview of Architects.

Maybe a compromise would be to further define Architectural scope to include the adequate selection of commercial interior design items? Or something along those lines.

Either way, as HB 61 is currently written I am against it.

Thanks for your time,

James Colles, PE
AELS #CE163605

October 28, 2021

Legislative Committee Report

At our committee meeting on October 28 we agreed to recommend monitoring HB61 and if it gets scheduled for a hearing, submit testimony to House Finance Committee, the next committee of referral. In our opinion, House Labor & Commerce Committee did not do its job, but instead reported the bill from committee without addressing serious issues we raised.

The first four points in this testimony are the same as what Catherine Fritz presented previously on April 26, representing the Board. In addition, today we added a new fifth point to counter information we understand is being shared with legislators. We believe it misrepresents what the bill does.

Testimony from the Board of Registration for Architects, Engineers & Land Surveyors on HB61

We held a special meeting of the Board on April 14 to review and discuss HB61. One of our members, Catherine Fritz, subsequently testified to the House Labor & Commerce Committee, expressing our concerns. At the time we believed HB61 needed more review, discussion with the bill's supporters so we could understand its full implications and relate our concerns to legislators. We shared the first four concerns listed on this paper with the Labor & Commerce Committee, but none of these were incorporated in a bill mark-up. We believe this should have been done before the bill was reported from that committee. We have since added a fifth point to clarify what we believe is misinformation that is being shared suggesting that registration under a practice act is voluntary. In all of the other professions regulated by our Board, professional registration is required as defined in Alaska Statutes and the Alaska Administrative Code.

1. The definition of Scope of Practice is excessively broad and incorporates activities that are outside the scope of Health, Safety, and Welfare. Interior design will overlap with architectural practice, as well as incidental practice of some engineering professions. It is essential that the definition of interior design be clear to minimize confusion and reduce enforcement issues.
2. There are many passages within the bill that 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 greatly concerned about the workload and impacts of adding a new design discipline and two members to the Board. We have had extensive turnover in staff in the past two years, both in operations and enforcement. The complexities of our multi-discipline board (with a myriad of details within each discipline) are already substantial, and we are very concerned about adding a new discipline without thoroughly understanding its impacts.
4. HB61 relies heavily on an organization called 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 that it relies upon to continually 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 Statutes, and is it similarly rigorous and collaborative? An example of potential concern is exam eligibility. Alaska Statutes 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. Can CIDQ change this practice? We don't yet know.

5. It is important to understand that HB61 establishes licensure for selected interior designers, referred to as "commercial" in the version of the bill we reviewed, through what is known as a "practice act," requiring that, unless exempted, anyone practicing interior design would be required to comply with the education, examination, and experience defined in statute and regulation. The most common framework for regulating interior design in the U.S. is through voluntary certification (approximately 27 states) while only four jurisdictions regulate interior design through practice acts (Nevada, Louisiana, North Carolina, and the District of Columbia.) There are significant differences in regulated responsibility and authority in each state, making it difficult to compare HB 61 to the laws in other jurisdictions. If HB 61 were modified to certify interior designers through what is known as a "title act," individuals who wished to use the title Interior Designer could be recognized through a voluntary process without being charged with health, safety, and welfare responsibilities in the current AELS statute and regulations subsequently adopted by the Board. Although the AELS Board is not the body making this public policy decision, we suggest that this might be an easier "first step" by proponents of the legislation.

We recommend that the full Board consider and approve submittal of this testimony at our next meetings on November 15 and 16.

Submitted by Loren Leman, Chairman
Legislative Committee

Other members participating: Catherine Fritz, Bob Bell, Ed Leonetti

Clarifying language added in Track Changes by Loren Leman on March 8, 2022

From: [REDACTED]
To: [Barbara Cash](#)
Cc: [Rep. Neal Foster](#); [Rep. Kelly Merrick](#); [Catherine Fritz](#); [Sara Neal](#); [Rep. Matt Claman](#)
Subject: AELS Board committee notes regarding HB61
Date: Tuesday, March 08, 2022 3:47:59 PM
Attachments: [HB61 comments, revised 3.8.22.pdf](#)

Barbara,

Thank you for expressing your concern about how I had represented HB61 in Section 5 of the notes I prepared on October 28, 2021 summarizing review by the Legislative Liaison Committee of the Board of Registration for Architects, Engineers & Land Surveyors. After considering your comments and proposed mark-ups within the context of statutes and regulations that guide our board, I conclude that my notes are still correct. However, I understand how you and others could misunderstand them, especially if you aren't as familiar with certain exemptions to registration that are already in law. So I clarified my notes with reviewer's edits.

I also added a sentence at the end of Section 5 to respond to your question about Board advocacy. We will leave the policy calls to the Legislature, but want the Legislature to understand the challenges the Board will have with implementation of the legislation, especially if the conditions for new registrants are considerably different from conditions for the other professions regulated by the Board.

I am copying the bill sponsor, Rep. Matt Claman, as well as the co-chairs of the House Finance Committee, where the bill resides the last time I checked. I am also copying the chair of the AELS Board, Catherine Fritz. You are welcome to share this email and the revised committee notes with others.

Best wishes,

Loren Leman, P.E.

[REDACTED]

October 28, 2021

Legislative Committee Report

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1. The definition of Scope of Practice is excessively broad and incorporates activities that are outside the scope of Health, Safety, and Welfare. Interior design will overlap with architectural practice, as well as incidental practice of some engineering professions. It is essential that the definition of interior design be clear to minimize confusion and reduce enforcement issues.
2. There are many passages within the bill that 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 greatly concerned about the workload and impacts of adding a new design discipline and two members to the Board. We have had extensive turnover in staff in the past two years, both in operations and enforcement. The complexities of our multi-discipline board (with a myriad of details within each discipline) are already substantial, and we are very concerned about adding a new discipline without thoroughly understanding its impacts.
4. HB61 relies heavily on an organization called 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 that it relies upon to continually 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 Statutes, and is it similarly rigorous and collaborative? An example of potential concern is exam eligibility. Alaska Statutes 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. Can CIDQ change this practice? We don't yet know.

5. It is important to understand that HB61 establishes licensure for interior designers through what is known as a "practice act," requiring that anyone practicing interior design would be required to comply with the education, examination, and experience defined in statute and regulation. The most common framework for regulating interior design in the U.S. is through voluntary certification (approximately 27 states) while only four jurisdictions regulate interior design through practice acts (Nevada, Louisiana, North Carolina, and the District of Columbia.) There are significant differences in regulated responsibility and authority in each state, making it difficult to compare HB 61 to the laws in other jurisdictions. If HB 61 were modified to certify interior designers through what is known as a "title act," individuals who wished to use the title Interior Designer could be recognized through a voluntary process without being charged with health, safety, and welfare responsibilities in the current AELS statute and regulations subsequently adopted by the Board.

We recommend that the full Board consider and approve submittal of this testimony at our next meetings on November 15 and 16.

Submitted by Loren Leman, Chairman
Legislative Committee

Other members participating: Catherine Fritz, Bob Bell, Ed Leonetti



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 99801-0806
Main: 907.465.1676
Toll free fax: 907.465.2974

January 26, 2022

House Finance
Alaska State Capitol - Room 519
Juneau, AK 99801-1182

RE: HB61

To the Honorable Representatives of the House Finance Committee:

The Alaska State Board of Registration for Architects, Engineers, and Land Surveyors is continuing to monitor the progress of HB61. Our Legislative Liaison Committee met in October to review the legislation. A report from that meeting is attached. We continue to remain available as a resource to the Legislature and are happy to attend any hearings on this or other bills affecting licensure of design professionals in the State of Alaska. We are grateful for the opportunity to serve you and the State of Alaska and hope you consider our input valuable.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Johnston".

Elizabeth T.B. Johnston, PE, FPE, Chair
Alaska State Board of Architects, Engineer and Land Surveyors
aelsboard@alaska.gov

Enclosure: AELS October 2021 Legislative Liaison Committee Report

From: [REDACTED]
To: [REDACTED]
Subject: FW: HB 61- Opposition Letter
Date: Friday, April 16, 2021 10:07:26 AM

From: Ramona Schimscheimer <[REDACTED]>
Sent: Friday, April 16, 2021 8:24 AM
To: Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>
Cc: Rep. James Kaufman <Rep.James.Kaufman@akleg.gov>
Subject: HB 61- Opposition Letter

Rep. Zack Fields & Rep. Ivy Spohnholz
Co-Chairs: House Labor and Commerce Committee
email: Representative.Zack.Fields@akleg.gov
Representative.Ivy.Spohnholz@akleg.gov

Reference: HB 61

Dear Representatives Fields and Spohnholz:

I am writing in opposition to HB61, a proposed statute related to establishing regulations and licensing for commercial interior designers.

Like many Alaskan members of the American Institute of Architects (AIA), I am opposed to HB61 because it is unnecessary, redundant, and most importantly, may negatively affect public health, safety, and welfare for the following reasons:

1. The definition of interior design is too far-reaching, and it creates an overlap of services rendered by State Licensed Architects whose rigorous education, training, testing and experience provides reliable and proven protection for the health, safety, and welfare of Alaskans, and
2. It will create confusion for the public and contractors with regards to liability and responsibility, also creating unnecessary costs to the State for enforcement, and
3. 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.

I have a great deal of respect for the work of interior designers who are often part of project teams that are led by Architects. But also note that there are many interior designers in Alaska who currently work independently, as small businesses, without infringing on health, safety, and welfare issues. They currently use their skills in the marketplace and do not need to be mandated to obtain a license. This is an unnecessary burden to existing interior designers, and to the State of Alaska.

Out of respect for your time and that of the Committee, I have prepared this written testimony in-lieu of speaking at Monday's hearing, but ask that my testimony please be included in the record. I have copied my District Representative Mr. James Kaufman on this email.

I thank you for your time and consideration.

Best Regards,

Ramona Schimscheimer, AIA
Principal Architect ASRC Energy Services
Email [REDACTED]

Copy: District 28 Representative Mr. James Kaufman

From: [REDACTED]
To: [REDACTED]
Subject: FW: HB 61, licensing of commercial interior designers OPPOSITION
Date: Friday, April 16, 2021 10:06:28 AM
Attachments: [image001.png](#)

From: Rep. Thomas McKay <Rep.Thomas.McKay@akleg.gov>
Sent: Friday, April 16, 2021 10:05 AM
To: Michelle E. Klouda <[REDACTED]>
Cc: Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Thomas McKay <Rep.Thomas.McKay@akleg.gov>; Forrest Wolfe <Forrest.Wolfe@akleg.gov>
Subject: RE: HB 61, licensing of commercial interior designers OPPOSITION

Good morning Michelle !! I have carefully studied this bill, and agree with your comments below. As a Registered Professional Engineer in Alaska myself, I am very familiar with the extensive educational, testing, and strenuous licensing requirements for Professional Engineers, Architects and Land Surveyors. The job responsibilities for these professionals is far and above what is expected of Interior Designers. If these professionals make a mistake in their designs and/or calculations, people's lives and safety are at risk. As such, I will oppose and vote against HB 61.

Thank you for your feedback and please stay in touch. Very best regards,



Representative Tom McKay
Alaska State House District 24
907.465.4993
rep.thomas.mckay@akleg.gov

From: Michelle E. Klouda <[REDACTED]>
Sent: Friday, April 16, 2021 9:55 AM
To: Rep. Thomas McKay <Rep.Thomas.McKay@akleg.gov>
Cc: Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>
Subject: HB 61, licensing of commercial interior designers OPPOSITION

Dear Representative McKay, Representative Spohnholz and Representative Fields,

My name is Michelle Klouda and I am a licensed and practicing Architect in the State of Alaska. I live in District 24 and I am an owner of an Architectural firm that resides downtown at 645 G Street, Suite 400. I would like to state my opposition to HB 61.

As an architect, I have an incredible respect for interior designers and their contributions to our field. However, I feel that HB61 goes a step too far by granting interior designers the authority to stamp construction documents – an authority that I feel should be reserved for architects, whose more rigorous training, testing, and experience provide the most protection for the Alaskan’s public health, safety, and welfare.

The top two reasons for my opposition to HB 61 are as follows:

1. Interior designers do not possess comparable qualifications to architects in terms of public health, safety and welfare (HSW). They receive less than half the training in building codes and safety regulations as architects.

There are considerable differences in registration requirements for interior designers compared to architects. To become a licensed architect state laws have established minimum education, experience, and examinations far beyond that of a commercial interior designer. At least 22% of Architectural Registration Exams are related to building code issues which are required to pass the exams. Interior Designer’s certification criteria, through their national organization, NCIDQ, allows them to pass 2/3 of exams with a 50% score and 0 correct answers on building codes and safety.

2. HB 61 will compromise Alaskan’s Health Safety and Welfare.

Architects coordinate a complex team of engineers and specialists, while overseeing a myriad of construction details, to ensure that buildings are constructed in accordance to design. Comparatively, interior designers only work on a narrow scope of a building’s design and do not have the same level of training, testing or experience to guarantee the same competence as an architect to protect public HSW. I have had experience with interior designers trying to play the role of architect or coordination project teams. Their lack of knowledge in the life safety and code aspects of architecture is apparent and they do not always understand all the parts and pieces that are required to put a building together.

I have many more discussion points and would be happy to discuss in further detail.

Thank you for taking time to read and take into consideration my opposition of HB 61, Licensing of commercial interior designers.

I am unable to attend the April 19 hearing, so I have prepared this written testimony in lieu of speaking at Monday's hearing, but ask that my testimony please be included in the record.

Regards,

Michelle E. Klouda AIA NCARB LEED AP BD+C
Principal



From: [REDACTED]
To: [REDACTED]
Subject: FW: HB 61 opposition
Date: Friday, April 16, 2021 10:07:14 AM

From: Melissa Morse <[REDACTED]>
Sent: Friday, April 16, 2021 7:59 AM
To: Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>
Subject: HB 61 opposition

Hello,

I am Melissa Morse, AIA, (American Institute of Architects) a Spenard resident and active community member. I also work in 900W 5th Avenue (the flash cube.) I have served on the AIA board for many years and was president in 2017. In the last 5 years I have become very familiar with the Interior Design licensure agenda.

I am firmly opposed to HB61 due to it being unnecessary and most importantly, may negatively affect public health, safety, and wellness by weakening protective requirements for stamping construction documents. Additionally, the burden of the government to license 2 dozen or so professionals and not provide an additional protection to the population is a waste of resources.

As an architect, I have an incredible respect for interior designers and their contributions to our field and our ability to collaborate and make better buildings. However, HB61 goes a step too far by granting interior designers the authority to stamp construction documents and manage construction as an agent of the owner – an authority that they are not trained for. This should be reserved for engineers and architects, whose more rigorous training, testing, and experience provide the most protection for the Alaskan public's health, safety, and welfare.

The American Institute of Architects (AIA) is a 95,000 member organization whose Alaska Chapter has hundreds of members, the majority of which also oppose HB61. Our Alaska chapter volunteers have been in the research phase and will continue to help to provide information as to what other states are doing on this topic and where the detriment to the public lies.

I will try to attend Monday's hearing but in case I am unable please accept this as my written testimony and include it in the record. I ask that this bill not leave the L&C committee. If I may be of any help please ask questions and I will do my best to get you full answers.

Sincerely,

-Melissa Morse, AIA

From: [REDACTED]
To: [Rep. Matt Claman](#)
Subject: Re: HB 61
Date: Monday, April 19, 2021 9:56:48 PM

Representative Claman,

Below is my email outlining my position on HB 61.

Thank you,

Tom

Begin forwarded message:

From: Tom Livingston <[REDACTED]>
Subject: HB 61
Date: April 19, 2021 at 9:53:49 PM AKDT
To: Representative.Zack.Fields@akleg.gov,
Representative.Ivy.Spohnholz@akleg.gov

Representatives Spohnholz and Fields,

I am writing in opposition to HB 61, Registration for Interior Designers.

Potential harm to consumers and the public is the sole basis for the government's regulation of any occupation. When regulation is deemed necessary, great lengths must be taken to ensure that the licensing board and the regulations that are created to govern the occupation focuses on consumer protection. To justify this legislation can evidence be provided to support significant and substantial harm to consumers in Alaska due to the unregulated practice of interior design?

This legislation would license a group of individuals to provide health, safety and welfare (HSW) building design services; services that are already provided by licensed architects. This creates an unnecessary duplication of licensed professionals and will cause confusion among code officials, clients and the public.

It is unclear to me how this legislation demarcates the services of an interior designer and an architect. Segregating interior design responsibilities within a building creates ambiguity in code compliance when two separate licensed design professionals are authorized for the same activity.

In my practice we have employed numerous interior designers over the years

(most ASID certified), and typically have one or more on staff at any time. The interior designers make valuable contributions to the design team for space planning, finishes, and furnishings services, but perform very few, if any, HSW/code tasks (typically smoke/flame spread, combustibility, VOCs etc. for materials). Like engineers, interior designers are another member of the full design team who's work the architect must review and coordinate. For reasons I've never fully understood, I've observed that interior designers do not embrace coordinating their work with other design team members in the same way that architects and engineers do.

I do not support this legislation.

Thank you,

Tom

Thomas W. Livingston, FAIA
Principal

Livingston Slone Studio

@Nvision



 LivingstonSlone.com

Making Quality Architecture Since 1975

Legislative Issues Committee
AELS Board
April 7, 2021

respond by email to aelsboard@alaska.gov

To: House Labor & Commerce Committee

The Board of Registration for Architects, Engineers & Land Surveyors had an initial discussion of HB61 at our last regular Board meeting in February and heard from Rep. Claman, but did not yet take formal action to express an official position. We intend to meet in a special session of the Board on Wednesday, April 14 to take up this issue. In the meanwhile, our Legislative Issues Committee identifies these initial areas of concern that we would like to discuss:

1. Reasons this legislation is needed. The AELS Board's primary function is to protect public Health, Safety & Welfare, and no one has identified to us a problem in Alaska that needs to be solved by this method.
2. HB61 proposes adding two seats to the current 11-member board. One of the seats is for an interior designer, while the other modifies current configuration to provide designated mechanical and electrical engineer seats. These are significant changes that deserve thoughtful consideration. They impact the function of the Board.
3. Many provisions within the bill seem arbitrary and undefined. For example, the use of the term "commercial," a word that is inconsistent with existing statutory language for other design professionals. Some of our members intend to discuss a considerably longer list of similar concerns the Board might choose to present.

We request time for the AELS Board to meet, discuss the bill, and possibly prepare a more comprehensive analysis and discussion of the bill for an official position before the House Labor & Commerce Committee completes its mark-up of the bill and reports it from committee.

And it might also be beneficial for your Committee to solicit inputs from Alaska professional societies whose members are currently regulated by the State.

This letter does not yet represent formal action by the full AELS Board, but it is an expression of some of the concerns already raised and what some of the topics will be when we meet as a Board next Wednesday.

Loren Leman, P.E., Chairman
Catherine Fritz, A.I.A., Member
F. Robert Bell, P.E., Member

From: [REDACTED]
To: [House Labor and Commerce](#)
Cc: [Rep. Matt Claman](#); [Sara Neal](#)
Subject: Comments about HB61
Date: Wednesday, April 07, 2021 4:29:09 PM
Attachments: [HB61 comments.pdf](#)

Co-chairs Fields and Spohnholz and Committee members,

We offer the accompanying statement as initial testimony on HB61 from a subset of the AELS Board. Please insert it in the members' packets. We have not had sufficient opportunity as a full Board to take formal action on a position statement before your first hearing on this legislation on Friday, April 9. However, it has caught the attention of several of our members, as well as others in professions regulated by our Board. We want to be sure you are aware of its ramifications as you begin considering the bill.

The AELS Board plans to meet for a special meeting on Wednesday, April 14 to discuss this legislation. I expect that you will hear from the Board chair after that meeting.

Loren Leman, P.E.
on behalf of the Legislative Issues Committee of the AELS Board

From: [REDACTED]
To: [Sen. Mia Costello](#); [Rep. Matt Claman](#)
Subject: Position Statement on HB61
Date: Monday, March 15, 2021 12:01:59 PM
Attachments: [AIA Alaska ID Bill Opposition - Position Paper - 20210311.pdf](#)

Dear Alaska State Representatives,

My name is Tim Conrad, AIA and I am a licensed architect in Anchorage, Alaska.

I am writing today regarding HB61, an act related to establishing regulations for commercial interior designers. Like many architects in the state and AIA Alaska, I am firmly opposed to HB61 on the grounds that it is unnecessary and most importantly, may negatively affect public health, safety, and wellness by weakening protective requirements for stamping construction documents. Attached is a short position paper handout outlining AIA Alaska's concerns about HB61.

As architects, we have an incredible respect for interior designers and their contributions to our field. However, we feel that HB61 goes a step too far by granting interior designers the authority to stamp construction documents – an authority that we feel should be reserved for architects, whose more rigorous training, testing, and experience provide the most protection for the Alaskan public's health, safety, and welfare. As we saw first-hand in the significant earthquake event of 2018, holding our built environment to the highest standard possible ensures not only the safest outcome, but one which provides the greatest opportunity for limited financial loss to property owners. Maintaining a clear directive that charges architects with their specific and rigorous training and professionalism, ensures safe and quality design which results in a resilient built environment for Alaska.

The American Institute of Architects (AIA) is a 95,000 member organization whose Alaska Chapter has hundreds of members, the majority of which also oppose HB61. I, along with several of my colleagues, plan to testify in opposition of HB61. Until then, we would like to open a dialogue with Alaskan State Representatives to promote our position and raise awareness of the full implications of HB61.

Thank you for your time and consideration of the implications of this bill to the health, safety, and welfare to the residents of Alaska.

Respectfully,

TIM CONRAD, AIA

ARCHITECT | **UMIAQ DESIGN, LLC**

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

A Member of the Ukpeagvik Iñupiat Corporation Family of Companies



Please consider the environment before printing this e-mail

From:

To:

[Sen. Click Bishop](#); [Sen. Mia Costello](#); [Sen. Elvi Gray-Jackson](#); [Sen. Lyman Hoffman](#); [Sen. Roger Holland](#); [Sen. Shelley Hughes](#); [Sen. Scott Kawasaki](#); [Sen. Jesse Kiehl](#); [Sen. Peter Micciche](#); [Sen. Robert Myers](#); [Sen. Donny Olson](#); [Sen. Lora Reinbold](#); [Sen. Joshua Revak](#); [Sen. Mike Shower](#); [Sen. Bert Stedman](#); [Sen. Gary Stevens](#); [Sen. Natasha Von Imhof](#); [Sen. Bill Wielechowski](#); [Sen. David Wilson](#); [Rep. Ben Carpenter](#); [Rep. Matt Claman](#); [Rep. Mike Cronk](#); [Rep. Harriet Drummond](#); [Rep. David Eastman](#); [Rep. Bryce Edgmon](#); [Rep. Zack Fields](#); [Rep. Neal Foster](#); [Rep. Ronald Gillham](#); [Rep. Sara Hannan](#); [Rep. Grier Hopkins](#); [Rep. DeLena Johnson](#); [Rep. Andy Josephson](#); [Rep. James Kaufman](#); [Rep. Jonathan Kreiss-Tomkins](#); [Rep. Christopher Kurka](#); [Rep. Bart LeBon](#); [Rep. Kevin McCabe](#); [Rep. Ken McCarty](#); [Rep. Thomas McKay](#); [Rep. Kelly Merrick](#); [Rep. David Nelson](#); [Rep. Daniel Ortiz](#); [Rep. Josiah Patkotak](#); [Rep. Mike Prax](#); [Rep. Sara Rasmussen](#); [Rep. George Rauscher](#); [Rep. Calvin Schrage](#); [Rep. Laddie Shaw](#); [Rep. Liz Snyder](#); [Rep. Ivy Spohnholz](#); [Rep. Andi Story](#); [Rep. Louise Stutes](#); [Rep. Geran Tarr](#); [Rep. Steve Thompson](#); [Rep. Cathy Tilton](#); [Rep. Chris Tuck](#); [Rep. Sarah Vance](#); [Rep. Adam Wool](#); [Rep. Tiffany Zulkosky](#)

Subject:

HB61 Effect on Alaskan Public Health, Safety & Welfare (HSW)

Date:

Friday, March 12, 2021 3:28:46 PM

Attachments:

[AIA Alaska ID Bill Opposition - Position Paper - 20210311.pdf](#)

Dear Alaska State Representatives,

My name is William T. Guevremont, AIA and I am a licensed architect living in Fairbanks, Alaska.

I am writing today regarding HB61, an act related to establishing regulations for commercial interior designers. Like many architects in the state and AIA Alaska, I am firmly opposed to HB61 on the grounds that it is unnecessary and most importantly, may negatively affect public health, safety, and wellness by weakening protective requirements for stamping construction documents. Attached is a short position paper handout outlining AIA Alaska's concerns about HB61.

As architects, we have an incredible respect for interior designers and their contributions to our field. However, we feel that HB61 goes a step too far by granting interior designers the authority to stamp construction documents – an authority that we feel should be reserved for architects, whose more rigorous training, testing, and experience provide the most protection for the Alaskan public's health, safety, and welfare.

The American Institute of Architects (AIA) is a 95,000 member organization whose Alaska Chapter has hundreds of members, the majority of which also oppose HB61. I, along with several of my colleagues, plan to testify in opposition of HB61. Until then, we would like to open a dialogue with Alaskan State Representatives to promote our position and raise awareness of the full implications of HB61. Please read our attached briefing and join us on Monday, March 15th at noon AKST to hear from Alaskan architects who want the best for the Alaskan public.

Thank you in advance for help in not supporting this proposed Bill! [Preview attachment AIA Alaska ID Bill Opposition - Position Paper - 20210311.pdf](#)

From: [REDACTED]
To: [Griffin Plush](#); [Rep. Liz Snyder](#); [House Labor and Commerce](#); [Rep. Ivy Spohnholz](#); representative.zack.fields@akleg.gov; [Rep. Liz Snyder](#)
Cc: [Sen. Roger Holland](#)
Subject: HB61 - No Go - for the betterment of Public Safety
Date: Friday, March 12, 2021 3:08:59 PM
Attachments: [image002.png](#)
Importance: High

Hello House Representatives and Senator,

I am writing to you today in response to learning about HB61.

I received a notice about HB 61 coming up from the AIA (American Institute of Architects) of which I am a member. As soon as I started reading about HB61 I could do nothing but cringe.

The idea that interior designers would hold the same of "PROFESSIONALISM" as Architect, as Professional Engineers, and Surveyors is absurd. All of the aforementioned have rigorous training with schooling, intern programs, and prerequisites to become eligible to even apply for testing for licensure. The work that these produce, will actually affect public safety.

To put interior designers at the same level is a considerable disservice to actual licensed professionals who have done all that it takes to be where they are.

I want to make sure, my standpoint is clear as I believe there are several positions make it unique to other input that you may receive.

- 1. I am not a licensed professional to date. I have been working on becoming one for almost 15 years. It took me that long to even become eligible to apply for eligibility for the ARE's (Architect Registration Exams). I have made a career of doing everything I can without having finished the licensure process. I firmly recognize the value of having a professional license and the value that it brings to projects and the public.**
- 2. A few years ago, I had 3 men try to break into my home. I had my wife and daughter asleep in my home. I held them off at gunpoint till they left, and it took the APD over 3 hours to finally arrive with me making the initial 911 phone call and 2 follow up calls to get them to show up. I was told per SB 91 that even if I had detained those men myself, that they cops would have most likely let them go per SB91 and arrested me and taken me to jail. This outraged me enough to publicly testify when a public review was being held. I say all that to say this, "HB 61 is so blatantly misguided, that it not only would endanger public safety by licensing "Interior designers", it would lessen/ damage the value of Licensed Professionals as stated are "Architects, PE's – Professional Engineers" and Surveyors."**
- 3. I started my drafting business in 2004 in California. One of my 1st clients was an accomplished interior designer who was recently published in the Architect Record for a \$5 Million home of actor Bryan Cranston. I mention this to say "I Fired him as a client after his 3rd project." Simple things like transitions from various spaces with minimal dimensions,**

Structural elements not taken into consideration (such as a post or beam) and other disturbing items left out of consideration. He is also an accomplished interior designer who has been an adjunct professor for colleges here in Alaska.

HB61. I can not see the upside of it as architects already hold the responsibility and required insurances for this scope of work.

Please let me know if there are any further developments on this bill or if you have any questions. Thank you.

Respectfully,



Grant Rebne, AIA Assoc, LEED GA
Anchorage, AK 99504



*****Please note the new email address*****

HB61 – EFFECT ON ALASKAN PUBLIC HEALTH, SAFETY & WELFARE

Does HB61 Improve Public Health, Safety & Welfare? - **NO**

Architects have successfully protected Alaskan public health, safety, and welfare (HSW) since 1949 by providing safe, code-compliant building designs. Architects coordinate a complex team of engineers and specialists, while overseeing a myriad of construction details, to ensure that buildings are constructed in accordance to design. Comparatively, interior designers only work on a narrow scope of a building's design and **do not** have the same level of rigorous training, testing, or experience to guarantee the same competence as an architect to protect public HSW.

By licensing interior designers, HB61 will compromise the proven, public protections already in place and unnecessarily increase the risk to Alaskan's HSW. There is simply no replacement for the intense training and testing an architect receives, which often spans ten or more years through three highly-regulated developmental stages from student to licensed architect.

- 1.) Obtain a degree from an educational program accredited by the National Architectural Accrediting Board (NAAB);
- 2.) Complete on-the-job training and document experience through the Architecture Experience Program (AXP);
- 3.) Pass the Architect Registration Examination (ARE), a rigorous series of six examinations required by every US jurisdiction.

Don't Architects Already Provide these Services? - **YES**

HB61 would create unnecessary redundancy and confusion amongst the public as to the authority and responsibility of portions of a building's design. Currently, architects successfully provide the services needed to design the interior and exterior of buildings. It would be harmful to the public as well as the practice of architecture to allow interior designers partial authority over an architect's scope. The unwanted effects of HB61 include less accountability, more confusion, more potential for mistakes and abuses, and increased complexity through unneeded regulations.

Does HB61 Address a Public Threat/Gap in Services? - **NO**

There is no evidence to suggest a current problem or threat to the public HSW that HB61 would remedy. HB61 has not grown out of a request from the general public, nor the interior products and construction industry. There are less than two dozen people with interior design education and experience in Alaska who have requested HB61 - regulations that they believe would raise their professional standing. However, there is nothing to demonstrate a current threat to public HSW.

Please do the right thing for Alaskans and OPPOSE HB61!

ARCHITECTS

- Education and training addresses the full range of public HSW building concerns (code compliance, safety regulations), including project management and design team coordination.
- Must pass the 6-part ARE exam with 65% average score or better before licensure, which includes over 4.5hrs of testing specific to codes and regulations.
- Must complete a minimum of 3,740 hrs in 6 total experience areas as part of the Architectural Experience Program (ARE) before licensure.
- Stamping responsibilities ensure that construction documents have been prepared and vetted by trusted industry experts with the highest qualifications.

INTERIOR DESIGNERS

- Do not possess comparable qualifications to architects in terms of public HSW building concerns. Receive less than half the training in building codes and safety regulations as architects.
- Have less vigorous criteria for certification from their national organization, NCIDQ. **Can pass 2/3 exams with a 50% score and 0 correct answers on building codes and safety.**
- Stamping of plans would be redundant yet incomplete with architects' scope.
- Are not currently restricted from practicing their trade or profession.
- Are divided on wanting additional regulations and liability.

ALASKANS

- Deserve qualified experts to stamp construction documents for buildings.
- Don't need the confusion of multi-tiered licensing regulations.
- Didn't request additional government regulations or expenses.
- Are not currently under-served or under-protected.



HB61 – A CLOSER EXAMINATION

Specific Concerns about HB61

AIA Alaska Chapter **opposes** HB61 on the grounds that it does not improve public HSW, splinters portions of the building designer's responsibilities and liability, and leads to an increased risk to project coordination and success. Architects have more than twice the training in building codes and safety regulations as interior designers - training that covers egress, fire ratings, fire suppression systems, and ADA compliance. Additionally, AIA Alaska takes issue with several specific sections of HB61, finding them ambiguous, redundant, or not in the public's best interest.

Sec. 24. AS 08.48.281 - reads that a person who is not a registered commercial interior designer is not prohibited from practicing commercial interior design if the services are performed within the scope of another professional license held by that person. As the **entire scope** of interior design is part of the scope of architecture, this shows how redundant it would be to license interior designers separately from architects.

Sec. 32. AS 08.48.341, item (24), subsections (a), (c), (d), (e) proposes changes to the Alaska Board of Registration for Architects, Engineers, and Land Surveyors (AELS). Subsection (a) contains references to "analysis, enhancing, and administration" regarding the definition of a commercial interior designer that are not referenced in the description of any other discipline mentioned in section 29, **nor are they applicable or relevant to the HSW mission of the AELS board**. There is serious ambiguity regarding concepts such as "nonstructural interior construction" or "nonstructural components." HB61 makes no mention of whom would determine whether or not a component is non-structural. Furthermore, how could an interior designer, who is not trained in structure, determine what qualifies as "non-structural" or not? Subsection (d) defines part of a commercial interior designers duties to include "number and configuration of exits for suite occupant load." AIA Alaska does not feel that interior designers are thoroughly qualified to address a building's exiting systems, which are crucial to the public's HSW.

Negative Effects to the AELS Board

HB61 seeks to add (2) additional members to the AELS board and introduce a new licensed profession which the board must and regulate. The AELS board already faces a significant workload and HB61 does not adequately address how the additional workload, costs, and strain would be mitigated, or more importantly how any discernible benefit to the public could outweigh the additional costs. Members of the AELS board have already raised concerns to HB61 sponsor Rep. Claman.

Unintended Consequences of HB61

While HB61 seems at first glance to be a positive bill meant to empower interior designers, a more thorough understanding reveals unintended negative consequences. It is hard to imagine a scenario where a commercial interior designer with limited expertise could better protect the public HSW than an architect. Applying the "Right Touch Regulation" approach encouraged by the Alaska Department of Commerce, shows that regulating interior designers neither reduces risk to the public nor presents an appropriate use of government intervention. Additionally, fragmenting the practice of architecture with a second, partial authority creates ambiguous situations regarding liability, building design cohesion, and project management. Alaskans deserve the best protections they can get, and that means leaving State statutes alone and architects in charge of stamping construction documents.



FINDING COMMON GROUND

Architects are problem solvers, often striving to "make everyone happy" by balancing the needs of their clients, other design professionals, contractors, and various government regulators.

In the spirit of good faith & support to our interior designer colleagues seeking increased distinction, respect, recognition, and professional standing, we support the following alternatives to an Alaska Interior Design Practice Act.

- A "Title Act" which would grant select interior designers additional distinction and recognition after meeting defined requirements, without granting stamping privileges for construction documents.
- Encouraging interior designers who want more authority to become licensed architects. There are many avenues to becoming a licensed architect, some that even substitute an accredited degree for experience (Alternative Education Path).
- Embrace the distinction of NCIDQ certification. There already exists a national organization to certify and therefore differentiate interior designers who have put in the additional time and resources to earn this distinction.

Architecture is vital and enduring because it contains us; it describes space, space we move through, exit in and use. - Richard Meier



From:

To:

[Sen. Tom Begich](#); [Sen. Click Bishop](#); [Sen. Mia Costello](#); [Sen. Elvi Gray-Jackson](#); [Sen. Lyman Hoffman](#); [Sen. Roger Holland](#); [Sen. Shelley Hughes](#); [Sen. Scott Kawasaki](#); [Sen. Jesse Kiehl](#); [Sen. Peter Micciche](#); [Sen. Robert Myers](#); [Sen. Donny Olson](#); [Sen. Lora Reinbold](#); [Sen. Joshua Revak](#); [Sen. Mike Shower](#); [Sen. Bert Stedman](#); [Sen. Gary Stevens](#); [Sen. Natasha Von Imhof](#); [Sen. Bill Wielechowski](#); [Sen. David Wilson](#); [Rep. Ben Carpenter](#); [Rep. Matt Claman](#); [Rep. Mike Cronk](#); [Rep. Harriet Drummond](#); [Rep. David Eastman](#); [Rep. Bryce Edgmon](#); [Rep. Zack Fields](#); [Rep. Neal Foster](#); [Rep. Ronald Gillham](#); [Rep. Sara Hannan](#); [Rep. Grier Hopkins](#); [Rep. DeLena Johnson](#); [Rep. Andy Josephson](#); [Rep. James Kaufman](#); [Rep. Jonathan Kreiss-Tomkins](#); [Rep. Christopher Kurka](#); [Rep. Bart LeBon](#); [Rep. Kevin McCabe](#); [Rep. Ken McCarty](#); [Rep. Thomas McKay](#); [Rep. Kelly Merrick](#); [Rep. David Nelson](#); [Rep. Daniel Ortiz](#); [Rep. Josiah Patkotak](#); [Rep. Mike Prax](#); [Rep. Sara Rasmussen](#); [Rep. George Rauscher](#); [Rep. Calvin Schrage](#); [Rep. Laddie Shaw](#); [Rep. Liz Snyder](#); [Rep. Ivy Spohnholz](#); [Rep. Andi Story](#); [Rep. Louise Stutes](#); [Rep. Geran Tarr](#); [Rep. Steve Thompson](#); [Rep. Cathy Tilton](#); [Rep. Chris Tuck](#); [Rep. Sarah Vance](#); [Rep. Adam Wool](#); [Rep. Tiffany Zulkosky](#)

Subject:

HB61 Effect on Alaskan Public Health, Safety & Welfare (HSW)

Date:

Thursday, March 11, 2021 3:12:20 PM

Attachments:

[AIA Alaska ID Bill Opposition - Position Paper - 20210311.pdf](#)

Dear Alaska State Representatives,

My name is Paul Baril, AIA and I am a licensed architect and small business owner in Anchorage, Alaska. I am also on the board of the APDC (Alaska Professional Design Council) and the AIA (American Institute of Architects) Alaska Chapter State Government Network Representative responsible to advocacy of our profession.

I am writing today regarding HB61, an act related to establishing regulations for commercial interior designers. Like many architects in the state and AIA Alaska, I am firmly opposed to HB61 on the grounds that it is unnecessary and most importantly, may negatively affect public health, safety, and wellness by weakening protective requirements for stamping construction documents. Attached is a short position paper handout outlining AIA Alaska's concerns about HB61.

Additionally, I would like to invite all of you to attend a virtual presentation, over your lunch hour, on Monday, March 15th at noon AKST to examine the merits of HB61 in closer detail. Please see Zoom meeting link and info below. We understand that this is short notice, but we wanted to give all of you an opportunity to see our presentation before HB61 goes into hearing with the House Labor and Commerce Committee. Depending on attendance, we will host a second presentation with a date and time to be determined.

As architects, we have an incredible respect for interior designers and their contributions to our field. However, we feel that HB61 goes a step too far by granting interior designers the authority to stamp construction documents – an authority that we feel should be reserved for architects, whose more rigorous training, testing, and experience provide the most protection for the Alaskan public's health, safety, and welfare.

The American Institute of Architects (AIA) is a 95,000 member organization whose Alaska Chapter has hundreds of members, the majority of which also oppose HB61. I, along with several of my colleagues, plan to testify in opposition of HB61. Until then, we would like to open a dialogue with Alaskan State Representatives to promote our position and raise awareness of the full implications of HB61. Please read our attached briefing and join us on Monday, March 15th at noon AKST to hear from Alaskan architects who want the best for the Alaskan public.

MEETING LINK BELOW -

Paul Baril is inviting you to a scheduled Zoom meeting.

Topic: HB61 Effect on Alaskan Public Health, Safety & Welfare (HSW) - Presentation from AIA Alaska

Time: Mar 15, 2021 12:00 PM Alaska

Join Zoom Meeting

<https://us02web.zoom.us/j/86257916124?pwd=UTluTURFVUF6dmhobUl0VlljaW4wQT09>

Meeting ID: 862 5791 6124

Passcode: 747698

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+1 346 248 7799

+1 669 900 6833

+1 301 715 8592

+1 312 626 6799

+1 929 436 2866

Meeting ID: 862 5791 6124

Passcode: 747698

Sincerely,

Paul R. Baril, AIA

Principal Architect

Nvision ARCHITECTURE, INC.



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