



**POSITION PAPER: SB 73**  
**Issued: March 3, 2023**

AIA Alaska OPPOSES SB 73, “An Act relating to registered interior designers and interior design...” as currently drafted and is working with industry peers to provide amendments.

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

*Background: Architecture integrates a full range of interior and exterior systems creating a building. Architects also provide the life-safety analysis documents for projects. Interior Design is limited to arranging interior spaces that do not require engineering or reduce the building’s overall safety. Both professions have a place in the industry. As a subsection of architecture practice, a well-considered scope of interior design practice is needed to maintain the current level of life-safety protection for the public.*

Restrictions at odds with the intent to address labor shortage and safety (Sec 29 AS 08.48.331 (a) (8)). This section has historically allowed over 300 entities with interior design services listed on their business license with the Alaska Department of Commerce to perform services related to interior finishes that are not health, safety, or welfare related. This includes interior finishes such as paint, floor coverings, and furnishings. The impact of the changes to this section will restrict this work to interior designers with NCIDQ qualifications. In 2022, there were approximately 22 NCIDQ qualified Interior Designers in Alaska. AIA Alaska and industry peers with concerns about this provision agree that changing this section is not needed to protect life-safety and will restrict the market for many interior design businesses, thereby inflating the cost of interior design services in Alaska.

SB 73 represents an unprecedented change in licensing for the design and construction industry. No other state has adopted a law with similarly broad understanding of regulated interior design scope that is typically required to be provided by licensed architects, engineers, and contractors. Similarly, only two states have any laws restricting the practice of interior design especially for work unrelated to life-safety. We have analyzed interior design legislation recently adopted in three other states as the result of collaboration between AIA architects, interior designers, and other industry peers that we consider successful – we are working towards a similar outcome for Alaska.

*Next steps: AIA Alaska will respectfully submit amendment recommendations to the bill Sponsor and Senate Labor & Commerce Committee in our ongoing effort to compromise on the proposed regulations.*

**Questions and discussions are welcome and encouraged!**

**Please direct any questions to:** AIA Alaska, via Tim Conrad AIA Alaska President  
phone: (907) 276-2834 or email: [contact@aiaalaska.org](mailto:contact@aiaalaska.org)

**From:** Matt Claman [REDACTED]  
**Sent:** Thursday, March 30, 2023 10:10 PM  
**To:** Sen. Matt Claman  
**Subject:** Fwd: ASID licensing

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed



Begin forwarded message:

**From:** Jobe Bernier [REDACTED]  
**Date:** March 28, 2023 at 12:45:28 PM AKDT  
**To:** Matt Claman [REDACTED]  
**Subject:** ASID licensing

Honorable Matt Claman, You and I briefly met at Doug Eby's house during the capital campaign for the Anchorage Unitarian Universalist Fellowship addition around 2016 and which I designed for a very tight budget. (We had discussed the affordable care act at that time). While you are not my representative, I typically support your politics and do respect how you consider the lives of your constituents. I am writing to you to discuss the ASID lobbying for licensed Interior Designers in Alaska. While I support this as a Title Act only, I do not support interior design licensing as a Practice Act. The roles of practice in terms of life safety are already well defined by the state for architects, and I am in support of all ASID members becoming architects if they wish to practice architecture. However, I keep hearing the response from ASID members that they 'do not wish to become architects', yet their lobbying actions are striving for them to do the work that architects are already trained and licensed for. Their actions and words are really saying two different things which I do not support. If a compromise were to be made, I would support the very old method many states used to use: If someone practices under a licensed architect for 10 years (even without architecture schooling), they can take the NCARB tests, and become a licensed architect on top of being a (title act) licensed Interior Designer. [Separate topic, but I do wish we would bring the 10-year architectural licensing method to Alaska since there are no in-state NAAB architecture schools (which Alaska architecture licensing requires). I deeply respect my own architectural education in Bozeman, but I also respect that life happens and some Alaskans cannot get themselves to an out-of-state school; plus we know that the chances of Alaskans returning home is significantly reduced when they leave for an out-of-state school. I wish all professional career paths had this option in Alaska.] My words are only my own and do not represent AIA, ASID, or any other groups or individuals. Thanks for considering my thoughts and be well.



jobe paul bernier, aia  
associate principal architect

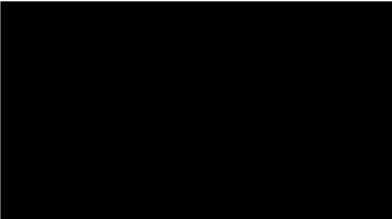
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[REDACTED]

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**From:** Matt Claman [REDACTED]  
**Sent:** Friday, April 7, 2023 2:44 PM  
**To:** Sen. Matt Claman  
**Subject:** Fwd: Opposition to SB 73 An act to register Interior Designers and Interior Design

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged



Begin forwarded message:

**From:** Jobe Bernier <[REDACTED]>  
**Date:** April 7, 2023 at 14:30:45 AKDT  
**To:** Senate.Labor.And.Commerce@akleg.gov, Senator.Jesse.Bjorkman@akleg.gov,  
Senator.Click.Bishop@akleg.gov, Senator.Elvi.Gray-Jackson@akleg.gov,  
Senator.Kelly.Merrick@akleg.gov, Senator.Forrest.Dunbar@akleg.gov  
**Cc:** Senator.Cathy.Giessel@akleg.gov, [REDACTED]  
[REDACTED]  
**Subject:** Opposition to SB 73 An act to register Interior Designers and Interior Design

Honorable Senators,

As an AIA Alaska Member and a Registered Architect in the State of Alaska for the past 9 years, I am writing in OPPOSITION of Senate Bill 73 as currently written.

There is no evidence that SB73 is necessary for the Health, Safety, and Welfare of the public –there exists no problem to solve. This proposed legislation is unnecessary and confusing and would not protect the consumer or increase public safety. In fact, it will limit consumer choices in selecting interior designers because SB73 restricts the practice to only those persons who have advanced education, and experience, and have passed an examination. There are fewer than 25 people in Alaska who hold this credential, so this bill opens the likelihood of more out-of-state practitioners becoming licensed than in-state practitioners. The current bill as written does not really support a local in-state workforce.

As an architect, my work integrates many different interior and exterior systems to design a full building. Architects are typically the prime consultant for public projects, and responsible for the life-safety analysis documents, as well as the coordination of all sub-consultant disciplines. While respectable, interior design is limited to arranging interior spaces and choosing materials that are non-structural and are not substantively part of the building's overall life safety. I value the expertise of interior designers, as well as many other specialists who contribute to building designs, but they should not lead life-safety related projects, especially those with multiple disciplines like mechanical or electrical engineering that have impacts beyond the *interior* of a building.

If SB73 moves forward, I offer the following comments and suggestions:

1. I support limiting Interior Design scope of practice to non-life-safety elements. I oppose allowing any life-safety and code analysis drawings to be stamped by Interior Designers for building permits.
1. I oppose Sec. 29 that modifies (a) 8 of AS 08.48.331. The existing statute allowing anyone to alter or repair a building if the work does not impact HSW should remain.
2. I oppose Sec 29 that adds (15) to AS 08.48.331 (a). This is redundant and confusing. There is no need to specifically call out persons who design kitchen and bath services, as anyone is already allowed certain exemptions in this section.
3. I oppose the cost of developing Interior Design regulations being passed on to existing AELS Board licensees. The costs should be borne by the affected Interior Design licensees.

Only two states in the US currently regulate the practice of interior design in a manner that is similar to the "Practice Act" that is proposed in SB73: Louisiana and Nevada. Approximately 27 states allow Interior Designers to hold a Title that distinguishes their advanced education, experience, and examination from others. I am not opposed to a similar 'Title' regulation for Alaska, if the legislature feels that some type of regulation is needed, and it does not restrict the practice of interior design to those without advanced credentials.

If SB73 is allowed to pass as a Practice Act then it sets a strange precedent for many other professions in terms of life safety. Should a hairdresser be allowed to also practice acupuncture simply because they are already trained with sharp objects? Should a chiropractor be allowed to practice medicine because they have knowledge of the human body? Should unlicensed paralegals be allowed to do the work of licensed attorneys? Should a general contractor also be allowed to practice architecture because of their construction knowledge? If anyone wishes to practice the work of another licensed profession, they are welcome to do so after they have attained the proper licensing rather than through lobbying.

Based on the above comments I urge you to OPPOSE Senate Bill 73.

Sincerely,

**Jobe Paul Bernier, AIA**  
associate principal architect

1711 George Bell Circle  
Anchorage, Alaska 99515

[Redacted]

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**From:** [Redacted]  
**Sent:** Monday, April 10, 2023 7:38 AM  
**To:** Sen. Matt Claman  
**Subject:** New Pom:SB 73 Register Interior Designers

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

John Gimarc

[Redacted]

ANCHORAGE 99515,agimarc

[Redacted]

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I am trying to understand why the State of Alaska has any business regulating interior designers. This legislation is yet another unnecessary intrusion into the marketplace. We need less regulation, less licensing rather than more. Cheers -