

Konrad Jackson

From: petra wilmworks.com <petra@wilmworks.com>
Sent: Sunday, April 09, 2023 6:07 PM
To: Senate Labor and Commerce; Sen. Jesse Bjorkman; Sen. Click Bishop; Sen. Elvi Gray-Jackson; Sen. Kelly Merrick; Sen. Forrest Dunbar
Cc: dianneblumer@gmail.com
Subject: : Opposition to SB 73 --especially after the earthquake I just felt

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Senators,

As an AIA Alaska Member, and a Registered Architect working in Alaska for the past 20 years, I am writing in OPPOSITION of Senate Bill 73.

SB73 will not improve the Health, Safety, and Welfare of the public. This proposed legislation is unnecessary and confusing and will not protect consumers or increase public safety.

Architects are typically the prime consultant for building projects. We are responsible for life-safety analysis documents and coordinating design and drawings from sub-consultants, such as landscape architects, civil engineers, structural engineers, mechanical engineers, electrical engineers, and interior designers. Lengthy architecture education, extensive professional testing for licensure, and annual continuing education requirements reflect these critical Health, Safety & Welfare studies, and responsibilities.

Interior design is limited to arranging interior spaces and choosing materials that are non-structural and not a critical part of a building's ability to protect life. Interior designers should not lead life-safety related projects.

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

- Limit Interior Design scope of practice to non-life-safety elements. Interior designers should not be stamping life-safety and code analysis drawings for building permits.
- The cost of developing Interior Design regulations should not be passed on to existing AELS Board licensees. The costs should be borne by the affected Interior Design licensees.

I urge you to OPPOSE Senate Bill 73.

Sincerely,

Petra Wilm, AIA

WILMWORKS
907-229-1646

3400 Spenard Suite 219
Anchorage AK 99503

From: [Thequestman](#)
To: [Senate Labor and Commerce](#); [Sen. Jesse Bjorkman](#); [Sen. Click Bishop](#); [Sen. Elvi Gray-Jackson](#); [Sen. Kelly Merrick](#); [Sen. Forrest Dunbar](#)
Cc: dianneblumer@gmail.com
Subject: Opposition to SB 73 An act to register Interior Designers and Interior Design
Date: Friday, April 07, 2023 3:50:55 PM

Dear Senators,

As an AIA Alaska Member and Alaska Resident I am writing OPPOSITION of Senate Bill 73.

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.

As an architect, my work integrates many different interior and exterior systems to form a full functioning building. Architects are typically the prime consultant for building projects, and responsible for the life-safety analysis documents, as well as the coordination of **all sub-consultant disciplines**. 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.

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.

I also 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.

Lastly, 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 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.

Based on the above comments and all that is logical, I urge you to OPPOSE Senate Bill 73.

Sincerely,

Bill Guevremont, AIA

Konrad Jackson

From: Jobe Bernier <JBernier@nvisionarch.com>
Sent: Friday, April 07, 2023 2:31 PM
To: Senate Labor and Commerce; Sen. Jesse Bjorkman; Sen. Click Bishop; Sen. Elvi Gray-Jackson; Sen. Kelly Merrick; Sen. Forrest Dunbar
Cc: Sen. Cathy Giessel; dianneblumer@gmail.com; matt@mattclaman.com
Subject: Opposition to SB 73 An act to register Interior Designers and Interior Design

Follow Up Flag: Follow up
Flag Status: Flagged

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:

- 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.
- 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.
- 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.
- 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

Konrad Jackson

From: Morse, Ryan N. <ryanm@designalaska.com>
Sent: Monday, April 10, 2023 7:14 PM
To: Senate Labor and Commerce; Sen. Click Bishop
Cc: Sen. Elvi Gray-Jackson; Sen. Forrest Dunbar; Sen. Jesse Bjorkman; Sen. Kelly Merrick
Subject: SB73 - Personal Letter of Opposition

Senator Bishop, Senate Labor & Commerce Members, and Senator Claman,

My name is Ryan Morse. I live and work in Fairbanks and am a licensed Architect. I have had the opportunity to represent my peers as the board president of AIA Alaska and currently sit on the AIA National Strategic council representing Alaska and the Marianas Islands. Over the past dozen years I have contributed to the Alaska's design and construction industry – working closely with engineers, fellow architects, specialty designers including interior designers, and contractors large and small.

I would like to take this opportunity to express my opposition to SB73 and have provided further information below to explain why I request that you do not move this bill from you committee in its current form.

The framing question that continues to come up among my peers in the industry is “Why do we need this legislation?” and the simple answer is that we don't. There has been no evidence presented that licensing of interior design professionals will alleviate a current problem, or prevent a foreseeable problem. Passing this bill would simply add unnecessary expenses and confusion. In other words, it offers a solution where no problem exists.

There are 20-25 people in Alaska who meet the requirements in the bill to become a licensed Interior Designer, yet this bill would add members to the AELS board and necessitate additional staff for the department. The costs will therefore be spread to all individuals currently licensed under AELS. Given that there is no public health, safety, or welfare problem currently, it is unnecessary to burden existing registrants with this costs and regulators with the burden when interior design licensing is not needed.

I want to dispel the idea that architects opposed to this legislation are participating in some sort of turf war or trying to prevent interior designers from providing the services they are qualified to offer to the public. The reality is that each design and engineering profession is uniquely trained on a certain set of skills and knowledge. Interior designers scope of work is already allowed to be performed, unregulated, without any safety concerns from the industry or public. When all the needed specialties work together they make up a team capable of creating a wide range of critical infrastructure to the community. Two areas that only licensed architects have been rigorously trained and tested through national licensing exams are the coordination of the other disciplines and analyzing the overall impact of a building to the health, safety, and welfare of the community. Like engineers we carry a portion of the responsibility to comply with building codes and assure that what is built does not pose a risk to the public. This does not mean that interior designers – much like acoustic experts, kitchen designers, and many other common members of the building design team – are not valuable. What it does mean is that they are parts of the team that do not require government oversight and licensing to safely contribute to the project.

Architects are allies at heart to interior designers and always prefer opportunities to work closely together both professionally and with elected officials when needed. Unfortunately, what benefits and motivates a minority of the design community you have undoubtedly heard from on this topic is that those who would qualify for a license under this legislation would be able to increase their perceived status and billing rates. This does not benefit the public or the state and also appears to be detrimental to the rest of the interior design industry in Alaska. Because this legislation will restrict over 300 businesses from providing services they are currently safely providing, there is a financial impact to every person, business, and government agency that every needs to build or renovate in Alaska.

This is not a debate about the quality of anyone's characters or the strength of their design work. This is simply a question of what is best for the Alaskan public. The current laws protect the public by setting strict standards for who can create construction documents. The existing laws are successful. They protect all of us by guaranteeing that construction documents are only published by the state's most qualified and prepared design experts. Any benefits that proponents of SB73 claim it will provide must be weighed against the proven track-record of safety and success that the current licensing structure has provided to the Alaskan community for decades.

Only two states – Louisiana and Nevada – currently regulate the practice of interior design, which is what SB73 is proposing. Florida recently became the latest state to repeal their statute regulating the practice of interior design because it was found to be unconstitutional to limit who can design a space when it does not impact life safety. Alabama, Texas, Connecticut and other jurisdictions have also rolled back legislation similar to SB73 in response to disputes in the courts. If legislation to recognize the qualifications of certain interior designers is believed to be necessary in Alaska, a more appropriate approach would be a 'Title Act' which more than half of the states in the country have adopted. This can provide registration, stamp, and acknowledgment of highly qualified and tested interior designers, without unnecessary complications of a process that is certain to attract law suits and increase the cost of construction in Alaska.

So when the time comes to make a decision on SB73, I ask that you consider this questions, "Why do we need this legislation?" I sincerely believe there has been no justifiable need for this bill presented, and I ask you not to support unnecessary costly and confusing legislation.

Thank you for your continued service to our State and thoughtful deliberation on this matter.

Please feel free to contact me if you have any follow-up questions.

Kindest Regards,

Ryan N Morse, AIA, NCARB
Architecture | Design Alaska, Inc.

601 College Road | Fairbanks, AK 99701
907.452.1241 | RyanM@designalaska.com



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community,
and Economic Development

BOARD OF REGISTRATION FOR ARCHITECTS,
ENGINEERS, AND LAND SURVEYORS

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

February 24, 2023

The Honorable Jesse Bjorkman, Chair
Senate Labor & Commerce Committee
Alaska State Capitol, Room 9
Juneau, Alaska 99801
Sent via email to laura.achee@akleg.gov

Dear Senator Bjorkman,

The Board of Registration of Architects, Engineers, and Land Surveyors (AELS) is providing this initial response to Senate Bill 73, "An Act relating to registered interior designers and interior design..." for your consideration in the Senate Labor & Commerce Committee. The bill adds the new profession of interior design to the responsibilities of the AELS Board.

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

We have also been monitoring the work of the Interior Design Working Group that began meeting in July 2022. This working group is comprised of four Alaskan architects and four interior designers who met five times to collaboratively address issues related to professional registration of interior designers. We understand that its work has not yet been completed, but as we explain in our attached commentary, its work product may be valuable for resolving at least some of the issues we raise. The AELS Board is currently polling its members to schedule another meeting soon to review findings of the Working Group to help us and you in considering SB 73.

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

Thank you very much for your consideration.

Respectfully,

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

Catherine Fritz, Chair
AELS Board

AELS Board

SB 73 Issues of Concern

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

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

acts (Nevada, Louisiana, North Carolina, Puerto Rico, and the District of Columbia). There are significant differences in regulated responsibility and authority in each jurisdiction, making it difficult to compare SB73 to the laws elsewhere. If SB73 were amended to certify interior designers through what is known as a “title act,” individuals who wish to use the title Interior Designer could be recognized through a voluntary process without being charged with health, safety, and welfare responsibilities in AELS statute and regulations. Although the AELS Board is not the body making public policy decisions like this, we suggest this might be an easier “first step” by proponents of the legislation.

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



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, attention Tim Conrad AIA Alaska President

phone: (907) 276-2834 or email: contact@aiaalaska.org



American Institute of Architects, Alaska Chapter

April 10, 2023

To: Alaska Senate Labor and Commerce Committee
email: 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

Re: Opposition to SB 73 An act to register Interior Designers and Interior Design

Dear Senators,

We are the six architects who are members of the Interior Design Working Group that is meeting to address issues related to the proposed regulation of interior design in Alaska. We are **opposed** to the current version of SB73 and have been diligently working with the interior designers to revise the bill to address concerns of our organization, the American Institute of Architects (AIA).

The Working Group was originally proposed by the Alaska Board of Registration of Architects, Engineers, and Land Surveyors (AELS) at its May 2022 meeting. Interior designers testified at that meeting and voiced a preference for organizing the Working Group, and the Board agreed. The Working Group consists of architects from the AIA and interior designers from the American Society of Interior Design (ASID). The first meeting was held in July 2022. It has now held a total of 6 meetings with 19 hours of discussion. The last meeting was March 31, 2023 to develop amendments to SB73. We were pleased to have the bill sponsor, Senator Matt Claman participate in this Working Group meeting. The AIA's goal has been to develop changes to the bill that we could find acceptable enough to withdraw our opposition.

It is our position that SB73 is not ready for committee hearing until the Working Group completes its review and recommendations. At the end of the last meeting (just 10 days ago), there were several amendments that were unanimously agreed upon. However, there were also areas of the bill that continued to need work so it was agreed to hold another meeting, which has not yet been scheduled.

The AELS Board recently held two special meetings regarding SB73. It requested a status report from the Working Group, which we have attached. This illustrates some of the important issues that have been discussed about possible interior design regulation in Alaska. We would appreciate your consideration of postponing action on SB73 until the work of the Interior Design Working Group has been completed.
Without completion of such work, we urge you to OPPOSE Senate Bill 73.

Sincerely,

Ryan Morse, Jessica Cederberg, Paul Baril, Catherine Fritz, Tim Conrad, Evelyn Rousso

Attachment: 3.13.23 Report to AELS Board

Cc: SB73 sponsor Senator.Matt.Claman@akleg.gov; AIA Lobbyist dianneblumer@gmail.com



INTERIOR DESIGN REGULATION WORKING GROUP REPORT

Prepared by AIA Alaska Members, for the AELS Board

Date: 3/13/2022

This report was prepared by the AIA Alaska members of the Interior Design Working Group. We made multiple requests to collaborate with the interior designers on this document but received no response. The report summarizes main issues discussed in email communications, the five recorded meetings of the working group between July and November of 2022, as well as ongoing efforts by the AIA group members to inform our organizations membership and state leadership on the topic. We continue to advocate for and pursue all opportunities to work with ASID and others in the industry on common-sense amendments to SB73.

LAWS IN OTHER STATES. The group studied interior design laws in other states. There is no model law for interior design, but elements and histories of several laws are noteworthy. These include:

Louisiana: Title Act in 1984; Practice Act in 1999. Regulated by stand-alone board. Interior design excludes: Design of architectural and engineering work except for specification of fixtures and their location within interior spaces; fire-rated shafts in multi-story structures, fire-related protection of structural elements, smoke evacuation and compartmentalization, emergency sprinkler systems, and emergency alarm systems.

Florida: Title Act in 1988; Practice Act in 1994; Repealed to a voluntary certificate of registration in 2020. '94 Act was the broadest legislation enacted that we studied; and it generated ongoing political and legal disputes; the current solution separated interior design from architecture and removed restrictions on the use of the title Interior Designer.

Alabama & Connecticut: Both have had their courts deem Interior Design Practice Acts unconstitutional and corrected them to Title Acts. Similarly, Texas eliminated its Practice Act that faced legal opposition.

Nevada: Practice Act in 1995. Regulated by Board of Architecture, Interior Design, and Residential Design. Restricts the use of interior designers as prime consultant when the project has more than 2 disciplines: Exempts persons who hold certificate of registration from Fire Marshal to provide approved interior materials and furnishings. Exemption for wall, window, floor coverings, furniture, equipment, lighting & plumbing fixtures not regulated by the building code.

North Carolina: Title Act, 2021. Regulated by Board of Architecture and Registered Interior Designers. 'Licenses' architect to practice a protected scope of work; 'registers' interior designers meeting certain qualifications. Interior Design excludes: Design of architectural and engineering work; Changing the means of access system; Changes of use; Changes to life safety plans, including means of egress components and creating or modifying fire and smoke rated construction.

Illinois & Wisconsin: Title Acts, 2022. Similar legislation from each state was reviewed and determined to have a comparable impact as the North Carolina Title Act, however some language in definitions was interpreted differently by group members and there is little information about the real-world impacts of these most recent regulatory changes.

SCOPE OF PRACTICE. The Working Group parties agreed that interior design is a distinct design practice that differs from architecture. Architectural practice is holistic and integrates interior and exterior spaces, as well as many types of building systems. Architecture includes all the tasks that interior designers do, whereas interior designers specialize in a specific limited portion of architecture.

Interior designers want to increase the scope of practice that they can perform without responsible control by architects. Currently, there are many interior design practices in Alaska that work independently, but their practices are limited by existing statute to: interior finishes, furnishings, and furniture; work in one-to-four-unit residential buildings; alterations and repairs that do not affect the structure or life safety. Architects agree that many aspects of interior design pose a low risk to public health, safety, and welfare (HSW) and should continue to be offered by interior designers without dependency on architects. Other tasks that are significant to HSW such as fire & smoke separations and egress components have been excluded from independent interior design practice definitions by recent legislation in other states. However, this unprecedented expanded HSW scope is currently desired to be part of the practice by interior designers based on direct statements by ASID members of the Working Group.

The group began discussing specific details and limitations of practice to create a “lane” for interior designers to practice within. However, SB 73 was introduced before this work was complete and the bill does not reflect shared ideas about the definition of scope of restricted interior design practice.

TITLE. Interior design is currently a broad term in the marketplace. Since the title is not controlled in Alaska, anyone can call themselves an Interior Designer. The interior designers on the Working Group would like to have a title for people like themselves who possess the education, experience, and examination conditions required for recognition by NCIDQ. AIA Alaska does not oppose a distinction of NCIDQ certified interior designers to increase professional respect and to help differentiate between types of interior design businesses. Architects also want to be clear about their support for maintaining the ability for non-NCIDQ interior designers to continue to have their businesses and offer their services as allowed under current laws.

REGULATORY MODELS. The architects understand the interior designers’ desire for regulation and do not object to such regulation to provide a title, as long as it does not create confusion to the public, reduce the existing responsibilities of licensed architects and engineers to protect HSW, or extend beyond the competencies of interior designers. With help from Sara Chambers, former Director of the AK Division of Professional Licensing, the Working Group reviewed three models for possible regulation in Alaska and developed pros & cons of each. The summary of that analysis is provided as an attachment to this report.

SUMMARY. The architects were not aware that SB73 was being drafted, but now that it has been filed we are working with anyone willing to join us in improving the current bill. We also remain open to finding alternatives to the bill that may satisfy the interior designers’ desire to be regulated. The architects’ two over-arching concerns if interior design is to be regulated in Alaska are:

1. There must be a clear definition of scope that keeps interior design in a “lane” that does not compromise HSW of the public.
2. Existing interior designers without NCIDQ qualifications must not be restricted in their work. They provide valuable services to architects and the general public, and there are many longstanding businesses that do not meet the rigorous NCIDQ requirements.

The currently published AIA Alaska position statement on SB73 is attached to this report for convenience. Working group members have assisted chapter leadership in drafting a detailed survey about SB73 to be distributed to the AIA Alaska membership. We hope the results will help inform efforts to draft amendments to the bill.

We remain eager to work with our colleagues from ASID and thank you for your interest in the Working Group.

Respectfully,

Ryan Morse, AIA, NCARB; Catherine Fritz, AIA; Jessica Cederberg, AIA, NCARB; Paul Baril, AIA, NCARB

April 10, 2023

TO: Senate Labor and Commerce Committee:

Senator Jesse Bjorkman
Senator Click Bishop
Senator Elvi Gray-Jackson
Senator Kelly Merrick
Senator Forrest Dunbar

Re: **Opposition to SB 73** An act to register Interior Designers and Interior Design

Dear Senators,

As an AIA Alaska Member and a Registered Architect in the State of Alaska for the past 19 years, I am writing **OPPOSITION** of Senate Bill 73.

I believe SB73 is unnecessary for the Health, Safety, and Welfare of the public –there exists no problem to solve. This proposed legislation is unnecessary and confusing, given the well-established life-safety protections promulgated by the current licensing requirements of architects and engineers, who are well versed in the art and science of creating or modifying facilities integrating requirements for people, building systems, and life safety considerations contained in the codes.

Further, this legislation may have negative consequences. First to consumers by excluding from commerce interior designers lacking advanced education and proper credentials required by SB73; and second to the State for the increased administrative burden for licensing and maintaining records for an additional profession.

As architects, our work integrates client requirements for spatial adjacencies as well as different interior and exterior considerations, requirements and systems to form a full building. Architects are typically the prime consultant for building projects, and responsible for the life-safety analysis documents, architectural plans and specifications, as well as the coordination of all sub-consultant disciplines. Interior design is limited to arranging interior spaces and selecting finish 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.

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

- 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. Life safety and code analysis drawings should only be stamped by a licensed architect or licensed fire protection engineer.
- 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.

- 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.
- 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 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.

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

Very Respectfully,



William G. Kontess, AIA, PMP, F.SAME

cc:

AK Senator Kelly Merrick
AK Representative Dan Saddler
AK Representative Jamie Allard
AIA Lobbyist Dianne Blumer

April 10, 2023

TO: Senate Labor and Commerce Committee

email: 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

Re: **Opposition to SB 73** An act to register Interior Designers and Interior Design

Dear Senators,

As a longtime Alaska resident, an AIA Alaska Member and a Registered Architect in the State of Alaska for the past 15 years (as well as other state jurisdictions for over 35 years) I am writing in **OPPOSITION** of Senate Bill 73.

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**. There is already law that requires the registration of design professionals. It would be duplicative and confusing.

As an architect, my work integrates many different interior and exterior systems to form a full building. Architects are typically the prime consultant for building projects, and responsible for the life-safety analysis documents, as well as the coordination of all sub-consultant disciplines. 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.

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

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

Sincerely,

David L. McVeigh, AIA, NCARB

cc: Senator Cathy Giessel/ Representative Laddie Shaw , AIA Lobbyist dianneblumer@gmail.com

April 7, 2023

TO: Senate Labor and Commerce Committee

email: 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

Re: **OPPOSITION to SB 73** An act to register Interior Designers and Interior Design

Dear Senators,

In mid-March of this year, I personally came to your Juneau office to express my concerns regarding SB73. I am a constituent of Senator Dunbar.

I am a lifelong Alaskan and licensed architect who has been practicing for over twenty-five years in this state. I am currently the president elect for the American Institute of Architects Alaska Chapter. I also sit on the Municipality of Anchorage 1% for Public Art Committee and the Anchorage Symphony Orchestra Board of Directors. I am writing in **OPPOSITION to Senate Bill 73**.

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.

As an architect, my work integrates many different interior and exterior systems to form a full building. Architects are typically the prime consultant for building projects, and responsible for the life-safety analysis documents, as well as the coordination of all sub-consultant disciplines. 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.

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

Regards,

J. Cederberg, AIA

cc: Representative Andrew Gray
AIA Lobbyist dianneblumer@gmail.com

April 10, 2023

To: Alaska Senate Labor and Commerce Committee

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

Re: SB73 Opposition Testimony Letter

Committee Chairs & Members:

Thank you for the opportunity to comment on proposed legislation that would significantly revise existing state law governing the registration of interior designers and expand the scope of interior design practice to include the practice of interior architecture.

My name is Paul Baril, the Owner and Principal Architect for Nvision Architecture, Inc. in Anchorage. I am testifying in opposition to 2023 Senate Bill 73. I believe this proposed legislation is unnecessary and confusing as currently written.

Only three states, Louisiana, Nevada and North Carolina, currently regulate the practice of interior design, which is what Senate Bill 73 is proposing. Florida used to be a state included in this, but they recently repealed the statute regulating the practice of interior design because it was unnecessary.

The purpose of laws in Alaska and all other states governing the practice of architecture and professional engineering is to protect public health and safety. Interior designers in Alaska already are providing their services on larger commercial building projects with no registration/license under the purview and responsibility of a licensed Architect. The public HSW is the most important element in my opposition because my experience of working with Interior Designers has shown me the lack of HSW knowledge and expertise that Interior Designers have as compared to Architects.

The proposed legislation contains new terms that lack clarity. I understand the desire for Interior Designers to want to be registered, and I think this is possible with some changes to the proposed bill language to prevent overlap and confusion.

Thank you for your consideration of my opposition to Senate Bill 73. I encourage you to vote against recommending passage. I would be pleased to respond to any questions.

Sincerely,
Paul Baril, AIA

April 7, 2023

To: **Senate Labor and Commerce Committee**

Email 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

Re: OPPOSITION to SB 73 An act to register Interior Designers and Interior Design

Dear Senators,

In mid-March of this year, I personally met with you at your Juneau office to express my concerns regarding SB73. I am a licensed architect who has been practicing for over twenty years in the State of Alaska. I currently serve on the Alaska Chapter of the American Institute of Architects as Central Section Chair.

I am writing in **OPPOSITION to Senate Bill 73**. 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.

As an architect, my work integrates many different interior and exterior systems to form a full building. Architects are typically the prime consultant for building projects, and responsible for the life-safety analysis documents, as well as the coordination of all sub-consultant disciplines. 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.

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

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Respectfully,

Ramona Schimscheimer

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

Email: rschimscheimer@asrcenergy.com
Desk: 907-334-1583 | Cell: 907-830-1671#



Copy: District E: Senator.Cathy.Giessel@akleg.gov
Lobbyist: dianneblumer@gmail.com



April 10, 2023

Senate Labor and Commerce
Senator Jesse Bjorkman
Senator Click Bishop
Senator Elvi Gray-Jackson
Senator Kelly Merrick
Senator Forrest Dunbar
State Capitol
Juneau AK, 99801

Re: SB 73

Dear Senator:

My name is Richard Rearick and I am a licensed architect in the State of Alaska, a resident of Eagle River, Alaska, and a constituent of Senator Kelly Merrick.

I am past Chair of the Alaska Chapter of the American Institute of Architects (AIA). I am also a past Chair of the Alaska State Board of Registration for Architects, Engineers, and Land Surveyors (BRAELS). I have also served as a Member Board Member and committee member, representing the State of Alaska, for both the National Council of Architecture Registration Boards (NCARB), and as a Board Member of the Western Council of Architectural Registration Board (WCARB), for which the State of Alaska is a member.

I am writing to you to express that I do not support SB 73. As a practicing architect with over 30 years of experience, and through my board work as the Architect Member with the State of Alaska and its member organizations, I believe that the passage of SB 73 will have a negative impact to the health, safety, and welfare of the citizens of the State of Alaska. While I respect the services that interior designers can perform, they do not have the same level of education, training, and testing that architects are required to obtain for licensure. Please consider the following reasons:

1. Architects currently have the training and qualifications to perform interior design. Interior design is part of the architecture design. Architects may consult with material specialist or interior designers in consideration of interior finishes, furniture, color selections, etc. While an interior design specialty can contribute to the overall design, the requirements for health, safety, and welfare reside with the architect responsible for integration into the overall building system.
2. Architects have a much more rigorous education typically requiring a professional degree that includes either a five year Bachelor Degree or a Master's Degree from an educational program accredited by the National Architectural Accrediting Board (NAAB).
3. Architects must pass a rigorous 6-part Architecture Registration Exam (ARE) that includes 4.5 hours of testing specific to codes and regulations.
4. Architects must complete 3,740 hours in 6 total experience areas as part of the Architectural Experience Program before obtaining licensure.

Senate Labor and Commerce
Senator Jesse Bjorkman
Senator Click Bishop
Senator Elvi Gray-Jackson
Senator Kelly Merrick
Senator Forrest Dunbar
April 10, 2023
Page 2

5. Architects have always maintained the responsibility for the architectural design that includes building interiors.
6. Licensing interior designers would unnecessarily confuse the public and provide less accountability for meeting the building codes and regulations. This will likely lead to work being performed that should be stamped by a licensed architect.
7. Interior designers are not currently restricted from performing their trade or profession, however, creating a registered interior designer would restrict many individuals and companies from doing the interior design work they currently do.
8. Architects currently may work with interior designers or develop interior design within the purview of their licensure. Where interior design work affects health, safety and welfare it is wholistically incorporated into the design documents prepared by licensed professional as it may interface with associated architecture, structural, electrical, and mechanical engineering disciplines. The integrated design is typically coordinated by licensed architects given their extensive education, training, and experience in building systems.
9. Creating a new licensed professional will unnecessarily create addition financial burden to the citizens of Alaska and the licensed professionals that are currently regulated by the State Board of Registration for Architects, Engineers, and Land Surveyors.
10. There is currently no apparent threat to the public health, safety and welfare that would warranty the creation of a registered interior designer.

Respectfully,



Richard Rearick, AIA, NCARB
Architect

RRR:rr

cc: Dianneblumer@gmail.com

April 7, 2023

TO: Senate Labor and Commerce Committee

email: 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

Re: **Opposition to SB 73** An act to register Interior Designers and Interior Design

Dear Senators,

As an AIA Alaska Member, and a Registered Architect in the State of Alaska since 1996, I am writing opposition of Senate Bill 73.

I am very familiar with the Bill and 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.

As an architect, my work integrates many different interior and exterior systems to form a full building. Architects are typically the prime consultant for building projects, and responsible for the life-safety analysis documents, as well as the coordination of all sub-consultant disciplines. 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.

327 Bawden St.
Ketchikan, Alaska
99901
(907) 225-2412 v
(907) 225-2422 f

*A Limited Liability
Company*

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

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

Thank you for your consideration.

Sincerely,



Timothy B. Whiteley, AIA

cc: Senator Bert Stedman senator.bert.stedman@akleg.gov
Representative Dan Ortiz representative.dan.ortiz@akleg.gov
AIA Alaska Lobbyist dianneblumer@gmail.com

April 10, 2023

TO: Senate Labor and Commerce Committee

email: 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
Senator.Cathy.Giessel@akleg.gov
Representative.Craig.Johnson@akleg.gov

Re: **Opposition to SB 73** An act to register Interior Designers and Interior Design

Dear Senators,

My name is Todd Jagels, and I am an AIA Alaska Member and a Registered Architect in the State of Alaska for the past 18 years, and I am writing in **OPPOSITION** of Senate Bill 73. My constituents are Senator Cathy Giessel and Representative Craig Johnson.

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 NCIDQ credential.

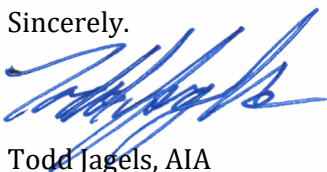
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Based on the above comments I urge you to OPPOSE Senate Bill 73.

Sincerely,



Todd Jagels, AIA

cc: dianneblumer@gmail.com (AIA Lobbyist)