



**AIA**  
Oregon

TO: House Committee on Economic Development and Trade  
FROM: Alene Davis, President AIAOregon  
DATE: February 7, 2017  
RE: Opposition to HB 2153

My name is Alene Davis and I am the President of the American Institute of Architects Oregon. I have been in the architecture profession in Oregon for over 20 years, in both the private and public sectors and have worked alongside interior designers throughout my career.

Thank you for allowing me to speak today. I think the foremost message that AIA Oregon wants me to relay is the fact that architects and interior designers work collaboratively in firms throughout our state. Both professions are important parts of the built environment and each relies on the other to be successful.

While AIA Oregon doesn't support this House Bill as currently written, we do support the interior design profession. This is not a turf war, a sign of disrespect, or a power play. And this is certainly not a gender issue. AIA Oregon's concern is the legal and financial accountability the legislature has previously deemed necessary to ensure the safety of the public.

Many professionals, including architects, have pledged their support for this legislation. These are good people who are supportive of interior design professionals, but we would argue that they have either not looked carefully at the language of the bill, or do not fully understand its implications. We, too, join them in their desire to formally recognize the work of interior designers, but this bill as currently written starts with that recognition, but ends with something different.

The concept of a voluntary registry for highly trained and skilled interior designers to distinguish themselves from others makes sense, and we support this approach. The "three Es" should be used for recognition of these professionals: education, experience and exam. A registry should provide information about schooling, time in the business and detailing of focus and specialty skills and certification by the National Council for Interior Design Qualification (NCIDQ) through examination.

AIA Oregon has suggested that such a registry include a number for those who are qualified and accepted for enrollment that then could be used for advertising, websites, and business cards etc. This would allow Oregon consumers to make intelligent decisions with knowledge about higher levels of education, experience and exam that have been achieved for the interior designers that would be listed on the registry.

Again, we support this effort, what it means for the highly skilled interior designers we work with, and what it means as a whole for the design and construction industry.

We cannot support the part of this bill that starts with "notwithstanding" which means "set aside everything else in the law". Through its current language, the bill says to ignore architect, engineer and construction contractor laws for those in the interior design registry. It states that interior designers can execute activities that are otherwise reserved for these other licensed professions *and*

that they can do so without the accountability sideboards that the other professionals must adhere to like bonding, liability insurance, notice of defect, warranty requirements, complaint and appeal processes and penalties.

Why are certain activities reserved to other professionals? The legislature decided that the health, safety and welfare of Oregonians required a closer examination of products that result from their work. The legislature decided to limit certain activities to specifically trained and licensed people and then hold those people accountable to the citizens of our state. The Architecture Practice Act (671.010 to 671.220) describes activities that are not considered the practice of architecture and therefore may be freely engaged in by interior designers.

HB 2153 allows interior designers to create and oversee implementation of building construction, with only the exception of the building envelope (that which separates from the outside) and structural supports. That means interior designers on the registry could design and provide supervisory services during construction of a building's mechanical, electrical, plumbing, ventilation, emergency ingress and egress, energy saving, fire & life safety and other systems *and* make sure those all meet Oregon building codes, regardless of the fact that they are not specifically trained or licensed to provide such services.

Our final concern is that the bill certainly causes more work for the Business Development Department than we believe they realize. They will have to write rules, check education, qualifications and exam requirements for those applying for the registry, ensure that those on the registry are not executing envelope or structural support work, and ensure that those who are not on the registry are not performing the work or services reserved for those on the registry. This will cost considerable time and money.

Per the 2015 Bureau of Labor Statistics report, between 510 and 1,190 Oregonians report being interior designers. The American Society of Interior Designers is more specific within that range, stating that there are 530 interior designers in Oregon. ([https://www.asid.org/sites/default/files/GPA\\_DATA\\_SHEET-Oregon.pdf](https://www.asid.org/sites/default/files/GPA_DATA_SHEET-Oregon.pdf))

Using those numbers, and if every interior designer applied and was accepted for the registry, a fee of \$200 a year would raise \$106,000, while a \$500 fee would raise \$265,000. We do not understand how that revenue will be sufficient for the Business Development Department to provide the oversight and regulation of the activities this bill would mandate.

There may be enough funds for the Department to keep track of a voluntary registry, which AIA Oregon supports, based on the three Es of education, experience and exam, but not enough to regulate interior designer *activities* – which is what HB 2135 requires.

We would propose to strike paragraph 3 (and related references) for its unintended consequences. We support registration and recognition, but not a redefining of the practices of professions responsible for the health, safety and welfare of the public.

Alternatively, we would welcome the opportunity to engage and jointly develop language that strengthens the interior design profession without creating unintended consequences for other licensed professionals and the public.

Please feel free to contact me if I can be of further assistance.