

DEPARTMENT OF LICENSING 2005: Interior Design Sunrise Review Summary

In view of their findings identified in the sunrise review, the Department of Licensing recommended that no state licensing be required for interior designers at this time because:

- There is a lack of evidence the consumer is being harmed;
- The public can be reasonably assured of initial and continuing professional ability; and
- The public can effectively be protected by current statutes and codes.

We respectfully submit a rebuttal to the DOL's Sunrise review summary.

REBUTTAL to Lack of Evidence that the Consumer is Being Harmed:

There are currently no standard means for determining qualifications to practice interior design in Washington State: anyone can be an interior designer and perform the functions of the profession without educational qualifications. The only way to ensure that the public occupies interior spaces that are safe is to define and regulate those qualified to practice interior design.

- The selection of inappropriate interior materials can contribute to fires, including ignition, spread rate, deadly gases and smoke. Interior designers are knowledgeable of fire codes, and are often the only member of a project team responsible for interior finish material specifications.
- Building owners are subject to claims made because of slip-and-fall injuries due to inappropriate flooring material selections and non-code compliant transitions between flooring materials. Interior designers know minimum specification standards that can minimize slip and fall injuries.
- Special provisions must be made in public facilities to be in compliance with the ADA. Interior designers are aware of these provisions and are able to identify when current facilities do not meet code, to what extent building owners are responsible for changes to be made, and to facilitate those changes. Building owners can be subject to lawsuits and to personal injury and damage claims should their facility be constructed without regard to ADA.

There are currently no standards in Washington State by which consumers can be ensured of an interior designer's credentials to work on public spaces.

- "Captive consumers" are people who use public spaces without actively participating in the decision making and selection process of the products and finishes utilized within the space.
- Public "captive consumers" have no ability to control their exposure to non-code compliant facilities assuming all commercial buildings are constructed to code.
- Because "captive consumers" are not able to discern when placing themselves in non-compliant or improperly designed facilities, the regulation of the interior design profession is the only way the public building occupants can be confident their safety is protected.

REBUTTAL to Lack of Evidence that the Consumer is Being Harmed (continued):

- The Department of Labor reported that over 2.5 million workdays were lost in a recent year due to injuries and illness. Many of these illnesses were reported as “Sick Building Syndrome” (SBS) and occurred for a variety of reasons, including inappropriate material specifications and adhesives used during installation of finishes. Individuals working in sick building environments for extended periods of time can develop flu-like symptoms. It is the responsibility of a professional interior designer to educate and assist clients in the promotion of healthy, safe work/living environments.
- If inappropriate materials are selected for use within an interior space, they can fail and require replacement. Incompetent specifications can cause financial harm to project clients and the public.

REBUTTAL to Statement that the Public can be Reasonably Assured of Initial and Continuing Professional Ability:

There are currently no standards of education, examination, and experience that are required for those practicing interior design in Washington State.

- Those practicing interior design in Washington State are not required to have any formal education in interior design.
- Those practicing interior design in Washington State are not required to pass a professional examination that ensures a minimum level of competency in interior design.
- Those practicing interior design in Washington State are not required to belong to a professional organization which monitors ethics, professional standards, and continuing education.

REBUTTAL to Statement that the Public Can Effectively be Protected by Current Statutes and Codes:

It is possible for someone without education or experience in interior design to practice interior design. Anyone can currently design and specify materials and finishes for use in hospitals, high rise condominium buildings, office structures, and hotel tower.

- While there are codes surrounding egress and interior finishes/materials, building and health code officials do not have the time or manpower to review construction documents to a level that guarantees 100% compliance: they rely on the credentials of the professionals working on the documents to comply.
- All professionals involved in construction documents are licensed except interior designers. Architects, engineers, contractors, and landscape architects are all registered and all have specific areas of expertise: for interior designers to be excluded from regulation is an oversight that can affect the outcome of a project.



REBUTTAL to Statement that the Public Can Effectively be Protected by Current Statutes and Codes (continued):

- No one on the project team has the ability to ensure compliance expertise in interior design except those who have interior design education, those that have passed a professionally recognized examination (NCIDQ), and those that have appropriate interior design experience.

In projects involving only non-load bearing and non-seismic construction, no supervision from an architect or engineer is required: anyone can perform the functions of interior design. Regulation of interior designers would ensure that the public has a guide by which to gauge a level of qualification.

- Each applicant for registration shall be required to hold an accredited certificate, diploma or degree in Interior Design (as necessary to apply for the NCIDQ exam).
- As of 2012 all Interior Design programs must be accredited by the Council for Interior Design Accreditation, CIDA (formerly known as FIDER), or determined by the regulatory board to be substantially equivalent to such accredited program. Interior Design programs that have become CIDA-accredited within the two-year period following the graduation date of the applicant qualify as accredited.
- Grand parenting (allowed within 5 years of the effective date of legislation): Applicants with fifteen years of documented proof of diversified experience in the practice of Interior Design may forgo the requirement for an accredited degree as long as they meet the number of credit hours in Interior Design coursework as determined by the regulatory board (We're suggesting the same as NCIDQ exam requirements, 40 semester or 60 quarter credit hours of interior design coursework.)