



Public Hearing – 2019 Senate Bill 303

Senate Committee on Public Benefits, Licensing & State-Federal Relations

Committee Chair & 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.

I am Jennifer Lehrke, AIA, the principal architect, founder and president of Legacy Architecture, a four-person Sheboygan firm focused on historic preservation, residential and commercial projects. I also serve as the 2019 Secretary/Treasurer of AIA Wisconsin, the state society of the American Institute of Architects.

I am testifying today on behalf of AIA Wisconsin members in opposition to 2019 Senate Bill 303. This proposed legislation is unnecessary and confusing. It would not protect the consumer or enhance public safety. It offers a solution in search of a problem.

Wisconsin is one of 19 states, including neighboring Illinois, Iowa and Minnesota, that have “title” registration laws for interior designers with no permitting authority. This means anyone can offer to provide interior design services. Wisconsin only regulates the use of a specific title – “Wisconsin registered interior designer.” In addition, 21 other states, including Michigan, have no state laws related to interior design.

It is relevant that the *Wisconsin Occupational Licensing Study Legislative Report*, submitted by the Department of Safety & Professional Services in December 2018, recommended the elimination of the state’s current title registration for interior designers. The report noted that “only 4 other states regulate” the practice of interior design and that the “regulation of interior designers has been identified by several studies as the most burdensome licensing requirement of all occupations.”

The purpose of laws in Wisconsin and all other states governing the practice of architecture and professional engineering is to protect public health and safety. Interior designers in Wisconsin already may provide services on larger commercial building projects than their counterparts in most other states. No seal or stamp is required to provide interior design services for building projects in Wisconsin containing less than 50,000 cubic feet in total volume. Architects and professional engineers are required for larger commercial building projects.

The proposed legislation contains new terms and new definitions for “interior design,” “interior alteration or construction project,” “interior life safety” and “interior technical submission” that lack clarity and are subject to interpretation. It would delete language in existing definition that: “Interior design’ does not include services that constitute the practice of architecture or the practice of professional engineering.” It offers no clear line of demarcation, which will create overlap and confusion.

The proposal also does not require the disclosure of conflicts of interest when an interior designer is receiving a commission or compensation for specifying specific products or materials on projects. It also does not adjust continuing education requirements related to health, safety and welfare issues to reflect the proposed expanded scope of interior design practice.

Founded in 1911, AIA Wisconsin represents over 1,500 individual members, including architects in private practice, business, industry, government and education.

Thank you for your consideration of our opposition to Senate Bill 303. We encourage you to vote against recommending passage. I would be pleased to respond to any questions.

**The American
Institute of Architects**

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