



March 25, 2025

ATTN: House Committee on Commerce and Consumer Protection

RE: AIA Oregon Stance on HB 2141

Esteemed Committee Members,

The AIA Oregon Board of Directors submits this testimony in OPPOSITION to HB2141, as currently written. Although we have been working with IIDA members toward amended language, that has not yet been published. Our opposition to the currently worded bill is as follows:

1. ORS 671 and ORS 672 protect the health, safety, and welfare of Oregonians by providing that only qualified, registered architects and engineers may provide architectural and engineering services in the State of Oregon. This includes, generally, design services related to fire and other safety concerns, including regarding materials selected for construction, exiting, occupancy loads, and the design of structural components and electrical and mechanical systems. Safety is the primary reason that sometimes an architect or engineer must prepare construction documents to obtain a building permit, including a permit for construction of interior spaces. HB 2141 presumes, without reference to any standard or other guidance, that interior designers who are not qualified to practice architecture or engineering in Oregon, should nevertheless be allowed to address fire, exiting, structural, mechanical and electrical safety concerns when designing interior spaces. Based on that unsupported presumption, under HB 2141, the Oregon State Board of Architect Examiners must modify its regulations and must secure the endorsement of other regulatory boards (Oregon State Board of Examiners for Engineering & Land Surveying, Oregon State Board of Landscape Architects, and Construction Contractors Board), to allow interior designers to provide services that, for public safety reasons, are reserved to the practice of architecture and engineering. HB 2141 is an unreasonable retreat from established building standards.

2. Some of the public testimony submitted in support of the HB 2141 suggests that it is not the intent of the bill to carve out of the practice of architecture or engineering

some space for interior designers. But that's not what the bill says. The bill would require OSBAE to develop regulations that allow some interior designers to prepare and submit construction documents for permit, that currently must be developed, stamped, and sealed by architects or engineers. The bill provides no guidance as to where the line between architecture, engineering, and interior design may be drawn.

3. The Oregon State Board of Architect Examiners is a very small semi-independent board funded almost entirely by the licensing fees of individual architects and architecture firms. OSBAE does not receive state funds. OSBAE's full time staff is 2-3 people. The Board Members are all volunteers, each with a full-time job, in addition to their Board responsibilities. HB 2141 charges OSBAE with the Herculean task of rewriting its own regulations, while consulting and cooperating with Oregon State Board of Examiners for Engineering & Land Surveying, the Oregon State Board of Landscape Architects, and the Construction Contractors Board, to establish a new class of regulated design professional in Oregon, the registered commercial interior designer. The tiny staff at OSBAE and the volunteer Board Members are required by HB 2141 to take on this extensive rulemaking task while continuing to perform their current duties regulating the practice of architecture in Oregon. This is not a task that OSBAE is suited for, or that it can take on effectively.

4. The Interorganizational Council on Regulation (“ICOR”), made of the Council of Interior Design Qualification (“CIDQ”), Council of Landscape Architectural Registration Boards (“CLARB”), National Council of Architectural Registration Boards (“NCARB”), and National Council of Examiners for Engineering and Surveying (“NCEES”) is engaged in an effort to develop guidance on how to define and regulate overlapping practice between the professions of architecture, engineering, interior design, landscape architecture, and surveying (“ICOR Practice Overlap Initiative”). As stated on the webpage for the ICOR practice overlap initiative, “The goal of the ICOR Practice Overlap Task Force is to develop uniform guidelines and definitions for competent overlap of practice that can be adopted as the recommended definitions in model law and national guidance issued by the ICOR organizations.” Here is the website: [ICOR Practice Overlap Initiative – ICOR](#). OSBAE tends to follow the recommendations made by NCARB with respect to model laws and regulations related to the practice of architecture. HB 2141



should not move forward considering national efforts to standardize regulation of the respective design practices and practice overlap. Oregon could find itself at odds with a national standard, after the investment of significant time and effort going through the process mandated by HB 2141.

5. What public interest is served by HB 2141? HB 2141 provides that some interior designers (we do not know how many) may provide architecture or engineering services if they meet unspecified qualifications to be determined later, even though they do not qualify to practice architecture or engineering in Oregon. This seems like a bill to promote the commercial interests of a few, rather than public safety in Oregon, which is the purpose of ORS 671.

We submit these points to the committee to consider and we hope that instead of taking action on this bill today, the committee request the bill authors to continue collaborating on amended text that can be brought forward next session with our support.

Please feel free to contact us with any questions or clarifications:

John Flynn, AIA – AIAO President – 503.939.5130

Kim Olson, AIA – AIAO Legislative Affairs Committee Chair – 503.548.2264

Heather Wilson – AIAO CEO / EVP – 385.229.0700

Thank you in advance for your careful consideration and thoughtful response.

A handwritten signature in blue ink, appearing to read "Heather Wilson".

Heather Wilson, EVP/ CEO, AIA Oregon