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The Green Tape Measure

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To:

Marc Berman

Chair, Assembly Committee on Business and Professions
California State Assembly
1021 O Street, Room 1100
Sacramento, CA 95814

April 18, 2026

RE: LATE Opposition to AB 1796

Dear Chair Berman,

We are The Green Tape Measure, a volunteer-run data-driven advocacy organization based in North Carolina. While we are not California residents, we are writing to oppose AB 1796 because its regulatory approach will set precedent for interior design licensing nationwide.

AB 1796 creates a new state license for "professional interior designers" administered by the California Architects Board, but only protects the title—it does not prevent unlicensed people from practicing interior design.

The following is specific language in AB 1796 that sets a dangerous precedent for practitioners and the public:

- 1) Regulating the title Licensed "Professional" Interior Designer is a fatal loophole for public safety by continuing to allow unqualified interior designers to provide interior design services.
- 2) The proposed board composition favors architects leaving interior designers outnumbered 5:1. This is a serious conflict of interest as architects have a financial incentive to restrict interior design scope. CCIDC will be reduced from an independent body to a single CAB seat, leaving the interior design profession without its advocate. Insufficient representation of the regulated profession compromises board legitimacy.
- 3) Scope-of-Practice language for interior designers is vague in the following areas which guarantees future litigation, not clarity:
 - a) Within Section 5701(g)(2)(B), "Services that constitute the practice of architecture... except as otherwise provided" is never clearly explained.
 - b) 5720(d) lists the other professionals that interior designers are allowed to collaborate with but explicitly leaves out architects.

- 4) This bill should NOT advance without the missing critical details listed below defined. Cost structure and penalties directly impact profession viability and consumer protection.
 - a) Section 5736: License, duplicate license, renewal, and delinquency fees.
 - b) Section 5711: Misdemeanor penalty.
 - c) Section 5515.5: Term expiration dates for the interior design board appointment.
- 5) The bill uses inflated regulatory comparison to justify new licensure:
 - a) Sec1(5) states incorrectly that "31 jurisdictions regulate interior design" when interior design is only regulated in DC.
 - b) The same section implies that 30 other states have similar systems when in fact most states license architects who then perform interior design.
- 6) Suggesting in Section 1(6) that there is "acceptable overlap" is premature and not defined. This implies that the bill expects ongoing negotiation rather than clear legal delineation.
- 7) Codifying the roles "Architect" and "Design Professional" is a Freedom of Speech issue since these titles are used across multiple professions spanning both the Construction and Technology industries (i.e. Software Architect, Data Architect, Enterprise Architect, Industrial Designer, etc...).

In regards to other arguments made public as of the date of this later:

- 1) "No evidence of widespread HSW harm from unlicensed interior designers" Legitimate concern. The bill doesn't present systematic data on HSW failures. However, interior design clearly involves safety-critical work (fire code, accessibility, structural coordination). GTM analyzed 42 deadly building fires in the United States all occurring AFTER architecture licensing laws commenced and ALL were found to be the result of inappropriate interior finishes, inadequately designed egress, and/or insufficient life safety. Clearly regulating architecture is not enough to protect the public.
- 2) Argument 2: "This bill only protects a title, doesn't prevent unlicensed practice—so what's the point?"
CORRECT. This is the critical weakness. If protecting public safety is the goal, the bill should prohibit unlicensed practice (with narrow exceptions).
- 3) Argument 3: "Architects and engineers already regulate these issues through their own licensing"
Partially true, but creates confusion by establishing parallel licensure without clear delineation of responsibility.

For the sake of protecting the public, we urge the following changes to AB 1796:

- 1) Clarify "interior design practice" and prohibit unlicensed practice except narrow exemptions (e.g., residential kitchen/bath design under certain threshold).
- 2) As it is a distinct profession, keep any new legislation under the CCIDC. If not possible, ensure an equal number of members for architecture and interior design are represented and update the name of the board to the California Architecture and Interior Design Board.
- 3) Define scope boundaries explicitly with architecture and engineering—provide clear examples of what interior designers CAN and CANNOT do for review by the interior design community.
- 4) Specify all fee and penalty amounts before the bill is finalized.
- 5) Create clear transition pathway for existing CCIDC designers to obtain licensure without re-taking exams.
- 6) Address free speech concern by not protecting the title "Design Professional" and by protecting the title "Licensed Architect" in place of "Architect."
- 7) Require periodic reporting on enforcement actions and HSW outcomes to determine if licensure of professions, not just interior design, is actually protecting the public.

This is a title act, not a practice act. Interior designers can call themselves "Licensed Professional Interior Designers" after obtaining a license from CAB. But unlicensed interior designers can still design commercial interiors, specify materials, and submit plans—they just can't use the "licensed" title.

This is the SAME model that CCIDC uses today. And the bill's sponsors argue that CCIDC's model is insufficient. The bill doesn't achieve what it claims—protection of public safety through regulation of practice. It only achieves title protection, **which already exists under CCIDC.**

Thank you for your time. Please feel free to reach out with any questions.

Regards,

A handwritten signature in cursive script that reads "Amy Wright".

Amy Wright
Founder