



March 2026

RE: Copy of CIDQ ICOR Survey Responses (responding as Amy Wright)

Group 1

Contracts/Bidding is included as Group 1, while in reality the authority to prepare, issue, and administer construction contracts flows from the design professional of record. Who actually has the authority to act as the design professional of record on an interiors project should be clearly spelled out as the interior designer.

Project Management appears directly in Group 1 and indirectly within Professional Practice (p.31) in Group 2. This is an inconsistency that needs to be reconciled if this document is truly intended to guide legislation.

Regardless, not regulating contracts/bidding and project management is an HSW issue as contract administration includes the authority to reject nonconforming work, stop work for safety reasons, and certify that construction conforms to documents. For too long who to hire as PM has been left up to employers - it should be made clear that interior designers are the ones with the most expertise to oversee Construction Administration and Project Management of interior design (including interior renovation) projects.

Group 2

1. Profession-Specific Definitions Underrepresent Interior Design Scope
Throughout Group 2, interior designer definitions are consistently narrower and more reactive than those provided for architects, despite interior designers serving as primary practitioners on interior projects. The definitions as written do not reflect parity of contribution and are inconsistent with the Practice of Interior Design definition established on pages 9-10. All Group 2 profession-specific definitions for interior designers should be revised to reflect the full scope of that definition.

2. Internal Contradiction Between Group 1 and Group 2

Group 2's Professional Practice section (p. 31) explicitly recognizes project and consultant management as part of interior design practice. However, Project Management appears in Group 1 as unregulated. This contradiction leaves no regulatory basis for recognizing interior designers as project leads on interior

renovation projects, contributing to a documented trend of those roles defaulting to architects regardless of project type. ICOR should reconcile this contradiction by either moving Project Management to Group 2 with appropriate analysis, or clarifying that interior design project leadership is a regulated component of professional practice.

Similarly, Contracts/Bidding in Group 1 leaves unaddressed the question of which licensed professional holds design professional of record authority on interior projects - a question with direct public protection implications that should not be left to market forces.

3. Acceptable Overlap Summaries Do Not Acknowledge Interior Design Project Leadership

The overlap summaries throughout Group 2 describe collaboration in general terms without acknowledging interior designers as appropriate project leads on interior renovation and construction projects. In the current regulatory and employment environment, this absence functions as a concession that such leadership is not recognized. Overlap summaries should explicitly acknowledge interior designers' leadership role on interior projects.

4. Sustainability, Universal Design, and Human-Centered Design

The definitions in these sections (pp. 24-25, 35-37) do not reflect interior designers' specialized expertise in indoor environmental quality, material specification, occupant health, and accessibility. These are areas where interior design education and practice provide distinct and rigorous expertise that should be explicitly recognized rather than described in general terms.

I urge CIDQ to advocate for revisions that align Group 2 with the full Practice of Interior Design definition and explicitly protect interior designers' project leadership roles.

Group 3

1. "No Scope Distinction" Language Subordinates Interior Designers
Throughout Group 3, interior designers are repeatedly described as having "no scope distinction" in overlap tables, including Building Components and Equipment (pp. 39-40). This effectively subordinates interior designers to whoever holds a defined scope, consistently the architect or engineer. This should be replaced with affirmative language describing interior designers' specific contributions.

2. Egress and Life Safety Boundaries Are Narrower Than Current Practice

The Egress section (pp. 51-54) is narrower than both the Practice of Interior Design definition (pp. 9-10) and actual practice. Interior designers routinely prepare life safety plans that include occupant load calculations and the designed placement of exit signs and fire extinguishers - constituting design decision-making beyond mere coordination. The overlap tables should be reconciled with the opening definition and with actual practice.

3. Electrical and Mechanical Systems Understate Interior Designers' Design Role

Interior designers are described only as coordinating and providing input on specifications (pp. 55-56, 75-76). This does not reflect practice. Interior designers make specific design decisions including types, locations, and mounting heights of electrical and data outlets, and coordinate thermal zone layouts to determine thermostat placement. These are design decisions documented in construction drawings and should be explicitly acknowledged as such.

4. Architects' Presence Across All Areas Warrants Scrutiny

Architects appear in virtually every practice area throughout Group 3 and in the document as a whole. A document grounded in education, experience, and examination should reflect whether that presence is justified by specific competency in each domain, given that other professions have deeper specialized training in their respective areas. CIDQ should request that ICOR provide educational and examination justification for architect involvement in each listed area, ensuring the document reflects genuine competency rather than professional precedent.

5. Inconsistency Between Opening Definition and Group 3 Tables

The Practice of Interior Design definition (pp. 9-10) is substantively strong, but the Group 3 boundary tables are consistently narrower. In any regulatory proceeding, the specific tables would likely carry more weight than the general definition. CIDQ should advocate for explicit reconciliation throughout Group 3.

Conclusion

As a credentialed interior designer with over 15 years of commercial renovation experience, my overall concern is that this document, while framed as neutral guidance, reflects and may accelerate existing trends that are narrowing the recognized scope of interior design practice. The inconsistencies between the opening Practice of Interior Design definition and the specific boundary tables throughout Groups 2 and 3, combined with the subordinating effect of "no scope distinction" language and the absence of explicit interior design project leadership recognition, create a framework that does not accurately represent competent interior design practice as I and many experienced colleagues have performed it.

The profession's long-term viability depends on regulatory documents that reflect what interior designers actually know and do. I am concerned that this document instead reflects professional precedent and market trends that are working against interior designers, particularly those earlier in their careers who are not developing the same breadth of technical knowledge that defined the profession a generation ago. I urge CIDQ to advocate strongly for revisions before this guidance is adopted or referenced by any licensing board.