




The Green Tape Measure

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June 19, 2026

TO:

The Honorable Aisha Wahab, Chair & Members of the Senate Committee on Business,
Professions & Economic Development
1021 O Street, Suite 3320
Sacramento, CA 95814

RE: AB-1796 — Oppose Unless Amended

Dear Chair Wahab and Members of the Committee,

The Green Tape Measure (GTM) is a volunteer-run, data-driven nonprofit organization. While based in North Carolina, we are dedicated to advancing equitable and evidence-based legislation for interior designers nationwide. We submit this letter in opposition to AB-1796 in its current form (as per “Today’s Law as Amended” reading) and urge its amendment before advancing it any further.

We recognize that AB-1796 represents a sincere effort to bring professional recognition to interior designers in California, and we fully support regulation. However, several provisions — as currently drafted — would produce outcomes that harm interior designers, fail to protect the public, and contradict the bill's stated purpose. The amendments below are necessary to make this legislation both effective and equitable.

1. Overinflation of Existing Interior Design Regulation — SEC. 1(5)

Stating that 31 jurisdictions regulate interior design is misleading and overstates the precedent for this bill. The overwhelming majority of those jurisdictions have voluntary title acts — not mandatory regulation. Voluntary title acts do not prevent unqualified practitioners from performing interior design work. Therefore, they cannot meaningfully be described as “regulation” for public safety purposes.

AMENDMENT REQUESTED: Correct Section 1(5) to distinguish between voluntary title acts and mandatory practice regulation, and accurately state the number of jurisdictions that prohibit unlicensed practice of interior design.

2. “Acceptable Overlap” Is Undefined — SEC. 1(6)

This ambiguity signals that the bill expects ongoing negotiation between professions rather than clear legal delineation — guaranteeing litigation rather than clarity. GTM's comparative research demonstrates that the overlap between interior design and architecture is limited, and does not justify treating interior design as a subset of architectural practice.

AMENDMENT REQUESTED: Define “acceptable overlap” based on the actual qualifications of each profession and not on historical expectations or assumptions.

3. Board Setup is a Conflict of Interest — SEC. 2 5510 & SEC. 4/5514

With no adjustment to its name, the California Architects Board will only add one interior designer per AB 1796 on an architect-dominated board. CCIDC, an independent interior design regulatory body, being reduced down to one voice on another profession's board ensures interior designers will not have a voice regarding their own profession. This will be further dramatized by the fact that architects also have a direct financial incentive to restrict the scope of interior design practice.

AMENDMENT REQUESTED: Ensure that interior designers hold equal representation with architects on any board with regulatory authority over their profession, or maintain CCIDC as an independent regulatory body. If the former, update the name of the board to reflect the addition of interior design as a regulated profession.

4. Restrictive Scope-of-Practice — SEC. 11 5701(g)(2) & (3)

Broadly stating that interior design does not include the practice of architecture or engineering without reciprocal language in their corresponding statutes is discriminatory and allows the definitions of other professions to be inadvertently used to restrict interior designers from practicing at all.

While interior design correctly does not include structural design, interior designers routinely hire and coordinate work of other licensed professions, including structural engineers; denying them the authority to do so is condescending and restrains legitimate practice.

AMENDMENT REQUESTED: Add reciprocal clarifying language in architecture and engineering statutes to ensure interior designers are not subject to restrictions that architects and engineers are not subject to in kind. Affirm explicitly that licensed interior designers may engage structural engineers and other consultants as needed.

5. Fines & Fees are Undefined — SEC.11 5711(a) & 5736(a)

AB 1796 cannot be evaluated for its real-world impact on practitioners or consumers without all fees and penalties fully defined. Practitioners cannot assess whether licensure is financially viable, and the Legislature cannot assess whether the fee structure will support effective administration. Undefined penalties are unenforceable and undermine the deterrent function of the statute.

AMENDMENT REQUESTED: Specify all fee amounts in Section 5736 and all penalty amounts in Section 5711 before the bill advances. GTM has consistently opposed the advancement of interior design bills that leave these provisions undefined, as they directly determine whether the regulatory framework is viable and enforceable.

6. Voluntary Acts do not Protect the Public — SEC. 11 5711(a)

From one perspective, AB 1796 protects only the title “Licensed Professional Interior Designer.” Adding “professional” to the regulation of “interior design” implies that it is a voluntary practice act as well. “Voluntary” and “regulation” are contradictions. No other licensed profession in California operates this way precisely because it does not protect consumers from unqualified practitioners. Also, this structure voids the argument that the bill’s own sponsor makes about CCIDC since the current model is voluntary.

AMENDMENT REQUESTED: If public safety is the stated goal, the Legislature should either (a) prohibit unlicensed practice of interior design with narrow, clearly defined exemptions or (b) clearly articulate why a voluntary structure is sufficient and how it protects public safety in a manner CCIDC’s existing act does not.

7. Exemptions for Other Professions Are Unjustified — SEC.11 5715

GTM’s comparative research — including a detailed analysis of architecture and interior design education and examination content — finds no factual basis for these exemptions. An architectural license is not a substitute for an interior design credential: top architecture programs devote approximately 8% of coursework to interior design content, and the Architect Registration Examination covers only 31% of the design content tested on the NCIDQ. If the stated purpose of this bill is public protection, every person performing regulated interior design work must be held to the same standard regardless of their other credentials.

AMENDMENT REQUESTED: Remove the blanket exemptions in Section 5715, or provide a documented, evidence-based justification for each exemption retained. At minimum, require that any exempt professional demonstrate competency in the specific domains covered by the NCIDQ that are relevant to the regulated scope of interior design.

8. The Transition Period Is Incomplete — SEC. 12 & SEC. 15 5811.2(a)(2)

We welcome the inclusion of a transition period for existing CCIDC-certified interior designers and an experience-only path to licensure. However, examination requirements are not indicated, and the date for compliance is unspecified (but implied to be 2027). If considering NCIDQ, one year will be insufficient time for compliance due to its cost and education requirements.

AMENDMENT REQUESTED: Set a specific compliance date in Section 12, extend the transition period to allow adequate time for compliance, and fully define the experience-based pathway (availability dates and any examination requirements) before the bill advances.

9. Updates to Architecture Law Required — Division 3 Chapter 3

The following sections of Architecture's existing statute will create overlapping regulatory frameworks leading to legal risk for practitioners and confusion for building officials and permit reviewers:

- §5501.1 (Definition of Practice of Architecture): Must be amended to state explicitly that the practice of architecture does not include the practice of interior design as defined in Chapter 3.8.
- §5537 (Exemptions): Must be updated to include a provision for interior designers, so that they are not inadvertently subject to the restrictions imposed on non-architects. For example, the current language restricts non-architect work to wood-frame construction and work that does not alter the safety of the building.

AMENDMENT REQUESTED: Amend Business & Professions Code §5501.1 to exclude interior design from the definition of architectural practice, and amend §5537 to include a clear exemption for licensed interior designers performing work within the scope defined in Chapter 3.8.

Conclusion

The Green Tape Measure supports a practice act for interior designers in California that is inclusive, equitable, and grounded in evidence. AB 1796 as currently drafted does not meet that standard. We urge the Legislature to incorporate the amendments described above before advancing this bill.

We would welcome the opportunity to provide testimony, share our research, or meet virtually with the bill's sponsors and relevant committee members to discuss these concerns in detail.

Our 2026 comparative study on Architecture and Interior Design Education and Examination is available at https://thegreentapemeasure.org/assets/docs/2025_GTM_ARCHandID.pdf and is submitted as supporting material with this letter.

Thank you for your time and consideration.

Regards,

A handwritten signature in cursive script that reads "Amy Wright". The ink is a light grey or blue color.

Amy Wright
Executive Director & Founder
The Green Tape Measure

About The Green Tape Measure

The Green Tape Measure is a volunteer-led North Carolina non-profit foundation dedicated to providing research that educates stakeholders on the importance of the interior design profession. We receive no income for advocacy statements, and our representatives are not registered lobbyists. The reports and analyses referenced in this statement are compiled in good faith using exclusively open-source, publicly available data. Our organization does not provide legal counsel, and all referenced materials remain subject to the comprehensive limited liability and data-accuracy disclaimers maintained on our website.