



The Green Tape Measure

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July 11, 2026

TO:

Chair Aaron Michlewitz and Members of the House Committee on Ways and Means
24 Beacon St.
Room 243
Boston, MA 02133

RE: S.3107 — Oppose Unless Amended

Dear Chair Michlewitz 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 S.3107 in its current form and urge its amendment before advancing it any further.

We recognize that S.3107 represents a sincere effort to bring professional recognition to interior designers in Massachusetts, 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.

SEC. 2 & 7 — Scope of Work is Too Narrowly Defined

Combined, the definitions of "commercial interior designer," the "practice of registered commercial interior design," and "nonstructural interior construction" exclude any work relating to "structural interior elements," architecture, engineering, exiting, and structural bracing. Meanwhile, interior designers routinely select and place electrical outlets, data outlets, equipment, fixtures, and exits (from spaces). They design power and data plans and reflected ceiling plans for coordination with engineers. They design and locate non-load-bearing partitions including those requiring kickbacks to the slab above for stability and internal bracing for wall-mounted equipment and cabinets. Related to life safety and egress, besides determining the quantity and location of exits from spaces, interior designers also locate exit signs and fire extinguishers, calculate occupant loads,

and ensure travel distances to existing exits are to code. In addition, stating that commercial interior design only includes those interior spaces “subject to state building code” ignores any residential codes, potentially forcing existing residential interior designers to become registered under this new law.

AMENDMENT REQUESTED: Amend the definitions to expressly confirm that interior design includes the following:

- Selection and placement of non-structural fixtures, equipment, outlets, and lighting, and the creation of related plans (power & data, reflected ceiling);
- Interior construction plans, including the design and placement of non-load-bearing partitions, that may include incidental bracing or slab kickbacks that do not affect the primary structure;
- Life safety plans covering the placement of exits from a space, the design of the exit access, the placement of exit signs, the placement of fire extinguishers, and occupancy-related calculations; and
- The coordination and hiring of other licensed design professionals as part of a project team.
- If proceeding with only regulating commercial interior design, clarify that it includes “public” interior spaces subject to state building code.

SEC. 3 & 4 — Removal of “Interior Designer” May Limit Future Regulation

By striking the existing definition of “interior designer” and replacing “interior” with “commercial interior” throughout, the bill appears intended to permanently avoid regulating interior design as a general profession, leaving only the narrow “registered commercial interior design” title within reach of future oversight.

AMENDMENT REQUESTED: Retain a general definition of “interior designer” alongside the new “commercial interior designer” definition, or add language clarifying that these amendments do not preclude the Legislature from establishing broader interior design regulation in the future.

SEC. 5 — Underrepresentation of Interior Designers

The amended board seats only 1 registered commercial interior designer out of 11 members, compared to 4 architects and 4 engineers.

AMENDMENT REQUESTED: Increase interior designer representation and/or reduce architect and engineer representation so there is equal voice amongst the professions. For example, 3 architects, 3 engineers, and 3 interior designers would achieve this without exceeding 11 members overall.

SEC. 7/299 & SEC. 8 — Missing Experience-Only Path to Registration

Requiring passage of the NCIDQ exam effectively requires formal interior design education for registration going forward. For existing practitioners, Section 8 provides only 12 months from the board's first annual meeting to apply for provisional registration, and only 3 years thereafter to pass the NCIDQ exam. For practitioners without an accredited degree, this timeline is likely insufficient even to accumulate the 60 semester credit-hours the NCIDQ currently requires just to sit for the exam, let alone to prepare for and pass it.

AMENDMENT REQUESTED: Extend the provisional-registration and pass-the-exam windows for the 10-year experience cohort, and/or direct the board not to require the NCIDQ examination until the Council for Interior Design Qualification establishes a clear experience-only path to exam eligibility.

SEC. 7/300 — Exemption of other Licensed Professions Existing Architecture & Engineering Laws

The bill allows a licensed architect to offer or engage in the practice of registered commercial interior design without meeting the education, examination, or experience requirements imposed on commercial interior designers seeking that same registration and title. Also, though no reciprocal language is shown in existing laws, interior design definitions include a broad statement that it does not include the practice of engineering or architecture or anything requiring an architect or engineer.

As revealed in our report "[Interior Design & Architecture](#)", these professions do not have sufficient overlap to justify this exemption. Besides being a public safety issue, allowing other professions to bypass the requirements set on interior designers, diminishes the value that interior designers bring to projects and threatens independent interior design businesses.

AMENDMENT REQUESTED: Remove any blanket exemptions and provide reciprocal language in existing architecture and engineering definitions (G.L. Title XVI c. 112 §60A & §81D) that these professions do not include the practice of interior design. Update §60L to include a clear exemption for registered interior designers performing work within their full scope defined by this bill.

SEC. 7/300 & 302 — Missing Permitting Privileges

Section 302 requires registered commercial interior designers to obtain and stamp their work with a seal, yet it does not explicitly state that it is to be used to obtain a permit. Also, Section 300(a) implies that registered commercial interior designers are prohibited from submitting plans in connection with a governmental permit without an architecture or engineering license. Taken together, the registered seal has no independent legal effect for the core purpose — permit submission — that registration is meant to enable.

AMENDMENT REQUESTED: Amend Section 300 to clarify that a registered commercial interior designer's seal is sufficient for permit submission for work that falls within the properly defined scope of registered commercial interior design, consistent with the seal authority already granted to other registered design professionals under Chapter 112.

Conclusion

The Green Tape Measure supports legislation for interior designers that is inclusive, equitable, and grounded in evidence. S.3107 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,



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.