




**The Green Tape Measure**

Research. Educate. **Advance.**

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To:

**Representative Brenda Shields**

Chair, Rules Administrative  
MO House of Representatives  
201 West Capitol Avenue  
Room 407-A  
Jefferson City, MO 65101

April 20, 2026

RE: Opposition to SB 1233 — Interior Design Licensing Bill

Dear Representative Shields,

We are The Green Tape Measure, a volunteer-run data-driven advocacy organization based in North Carolina. While we are not Missouri residents, we are writing to **oppose SB 1233** because its regulatory framework undermines the very public safety protections it claims to establish.

SB 1233 creates a licensing framework for interior designers but, paradoxically, **allows unlicensed individuals to practice licensed interior design without consequence**—a fundamental regulatory failure that creates dangerous public safety gaps.

## Critical Failures in SB 1233

### 1) Untitled Practice Exemption: A Fatal Public Safety Loophole

**Sections 327.441.2(10) and 327.710.3 create a catastrophic gap:** Anyone can perform all activities of "licensed interior design"—including specifying materials, designing egress, coordinating with MEP systems, and submitting construction documents—**without a license**, provided they do not use the title "licensed interior designer."

This is **title protection, not practice protection**. It fails to protect public safety by continuing to allow unqualified practitioners to perform design services.



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**The data supports this risk:** GTM analyzed 42 deadly building fires in the United States occurring after architecture licensing commenced. ALL were found to result from inappropriate interior finishes, inadequately designed egress, and/or insufficient life safety—failures that occur at the intersection of interior design and public health. Regulating the title alone does not address these risks.

## 2) Regulatory Subordination Through Decimated Board Representation

**Section 327.031 reduces interior designer board representation from 4 seats to 2, while the bill abolishes the Interior Design Council entirely** (Section 327.081(3)).

This is regulatory subordination disguised as professional regulation:

- Interior designers lose independent advocacy on their licensing board
- The profession has no seat at the table for rule-making that defines their scope
- Architects—competitors with a financial incentive to restrict interior design scope—now control interior design regulation with minimal professional input

**Board legitimacy requires balanced representation.** Insufficient representation of the regulated profession undermines the entire regulatory structure.

## 3) Vague and Contradictory Scope Definitions

**Section 327.700(6) defines interior design practice while explicitly prohibiting legitimate interior design work:**

- Interior designers are **prohibited from increasing the capacity of exits** in a space (Section 327.700(6)). This means if, for example, a conference room design requires a second emergency exit, the interior designer cannot design it—an architect must be hired instead.
- Interior designers are **prohibited from coordinating with MEP (mechanical, electrical, plumbing) systems and life safety elements**, yet real-world interior design **requires** specifying outlet locations, coordinating fixture types, and ensuring egress compliance.



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**This creates absurd real-world scenarios:** An interior designer cannot specify the location of electrical outlets in a commercial kitchen but can design the entire kitchen layout? An interior designer cannot coordinate with engineers on ventilation but must understand how ventilation impacts the space?

These restrictions don't protect public safety—they prevent interior designers from performing the core work that requires their expertise.

#### **4) Unequal Regulation: Architects Exempted from the Same Requirements**

**Sections 327.710.4 and 327.720(2) explicitly exempt architects from requirements imposed on interior designers.**

Our research indicates that accredited architecture programs provide only 8% of the interior design instruction found in a full interior design degree. If the restrictions on interior designers are necessary for public safety, why are architects exempt? This reveals the true purpose: **not public safety, but limiting interior design's scope and professional autonomy.**

#### **5) Vague "Design Professional" Title Definition Creates Legal Chaos**

**Section 537.033(1) now restricts the title "Design Professional" to include "licensed interior designer."**

"Design Professional" is used across multiple industries—graphic designers, UX/UI designers, product designers, software architects—all requiring significant training and education. **Codifying this title is a freedom of speech issue** and creates unnecessary legal liability for other design professions.

This mirrors a critical flaw in California's AB 1796, which GTM opposed for the same reason.



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## What This Bill Actually Does (vs. What It Claims)

**SB 1233 claims to "regulate interior design to protect public safety."**

What it actually does:

1. Creates a license title
2. Does NOT prevent unlicensed practice
3. Does NOT clearly define interior design scope
4. Reduces professional representation on the licensing board
5. Creates contradictory requirements that prevent interior designers from performing their core work
6. Exempts architects from the same restrictions, revealing regulatory bias

**This is deregulation disguised as licensing.**

## Recommended Changes

For SB 1233 to actually protect public safety, we urge the following:


1. **Prohibit unlicensed practice** of interior design with narrow exemptions (e.g., residential projects under certain thresholds).
2. **Eliminate vague scope restrictions** that prevent interior designers from performing legitimate work.
3. **Restore interior designer board representation** to at least equal footing with architects, or establish a separate Interior Design Board.
4. **Make scope definitions reciprocal:** If interior design excludes certain activities, those disciplines should explicitly acknowledge that their activities do not include interior design.
5. **Remove the "Design Professional" title restriction** to avoid free speech and inter-industry conflicts.
6. **Clarify "exit access" vs. "egress design."** Interior designers should be able to design the interior components of egress systems while architects handle structural/building-wide egress strategy.

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## Closing Statement

Interior design **should** be regulated—but equally and independently. SB 1233 fails on both counts. It creates a licensing structure that appears to protect the public but actually:

- Allows unlicensed practice
- Subordinates interior design to architecture
- Prevents interior designers from performing their core competency work
- Treats similarly-situated professions unequally

We urge the Committee to either reject SB 1233 and start fresh with a true practice act, or substantially revise it to address the regulatory failures outlined above.

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

Regards,



Amy Wright  
Founder  
The Green Tape Measure