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The Green Tape Measure

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June 18, 2026

TO:

The Honorable Ronald Mariano, Speaker of the House

The Honorable Aaron Michlewitz, Chair of the House Committee on Ways and Means

RE: Senate Bill 3107 (Interior Design Licensure) — Oppose Unless Amended

Dear Chairman 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 strong opposition to S3107 in its current form and urge its amendment before advancing it any further.

We recognize that S3107 represents a sincere effort to bring professional recognition to commercial 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.

1. A Title Act Is Not a Practice Act — and That Matters

S3107 regulates only the title "registered commercial interior designer." As drafted, anyone may continue to practice commercial interior design and call themselves an interior designer or commercial interior designer without a license — so long as they omit the word "registered." No other profession relies on this model precisely because it fails to protect the public from unqualified practitioners.

AMENDMENT REQUESTED: If public safety is the stated goal, the Legislature should either (a) prohibit unlicensed practice of commercial interior design with narrow, clearly defined exemptions, or (b) clearly articulate why a title-only structure is sufficient and how it protects public safety.

2. Board Composition — Sections 5(a) and Section 6(a)

S3107 creates two separate oversight bodies with very different compositions, which raises serious concerns about the autonomy and effective advocacy of the interior design profession:

- Section 5(a) — Administration & Finance Executive Office: As amended, this board would include 4 architects, 4 engineers, and 1 general contractor, with only 1 interior designer. Interior designers would be outnumbered 9:1, leaving the profession without meaningful representation in a body with regulatory authority over it.
- Section 6(a) — Commercial Interior Designers Board: While GTM generally supports a 5-member interior designer board plus a public member, it is unclear how this board's authority relates to the Administration & Finance Executive Office, where interior designers are so drastically outnumbered.

Insufficient representation of the regulated profession is not merely a procedural concern — it is a conflict of interest. Architects and engineers have a financial incentive to restrict the scope of interior designers, and granting them disproportionate oversight authority undermines the legitimacy of the board and its rulings.

AMENDMENT REQUESTED: Ensure that interior designers hold a proportionate voice — at minimum, equal representation — in any board with regulatory authority over their profession. Clarify in the statute the specific authority and responsibilities of each body relative to the other.

3. Definitions Are Overbroad and Will Produce Unintended Consequences — Section 7 / Section 298

The definitions in Section 298 require significant clarification. As currently drafted, several key terms are ambiguous in ways that will predictably produce litigation or exclude qualified designers from legitimate work:

- "Nonstructural interior construction" is defined too broadly. The current language — prohibiting any "structural bracing" — would bar common interior design practice, such as kicking back non-load-bearing walls to the ceiling structure when those walls do not extend to the slab above. Similarly, the phrase "does not include any load-bearing components" could bar designers from specifying wall-mounted televisions, cabinetry, or other elements that require internal wall blocking — a routine and safe practice.
- Residential spaces are excluded from the definition of commercial interior design, yet many residential spaces (including mixed-use and multi-family buildings) are subject to the state building code. The Legislature should clarify whether such spaces fall within or outside the scope of the bill.

- "Practice of registered commercial interior design" as defined does not align with the actual qualifications and competencies of interior designers. Interior designers are trained and tested in life safety, egress, number of exits, and MEP system coordination. Restricting them from these areas without equivalent reciprocal language in the definitions of architecture and engineering practice is discriminatory and factually unsupported.

AMENDMENT REQUESTED: Simplify the definition of "nonstructural interior construction" to specify non-load-bearing walls and common interior partition systems, without inadvertently capturing standard interior design detailing. Add reciprocal language in architecture and engineering definitions to ensure interior designers are not subject to restrictions that architects and engineers are not subject to in kind.

4. Architect Exemption Is Not Supported by Data — Section 7 / Section 300

S3107 exempts architects from the requirements imposed on commercial interior designers. GTM's comparative study, *Interior Design & Architecture: A Comparative Analysis of Education and Examination*, directly addresses whether this exemption is justified by equivalency of training or competency. The findings are unambiguous:

- Top architecture programs devote only approximately 8% of coursework to interior design content.
- The Architect Registration Examination (ARE) covers only 31% of the design content tested on the NCIDQ — and the ARE lacks any explicit testing of human behavior, a foundational element of interior design practice.
- The NCIDQ places substantially greater weight on codes and regulations specific to interior spaces — finish flammability, interior egress, accessibility of fixtures and millwork, and fire-rated interior partitions — than the ARE, which tests codes across the full building envelope.
- Our report concludes: an architectural license is not a substitute for an interior design credential.

AMENDMENT REQUESTED: Remove or substantially narrow the blanket exemption for architects. At minimum, require that architects performing the regulated scope of commercial interior design demonstrate competency in the specific domains covered by the NCIDQ, consistent with public safety rationale.

5. Fee Provisions Are Undefined — Section 7 / Section 300

S3107 does not specify license fees. GTM has consistently opposed the advancement of interior design bills that leave this provision undefined, as it directly impacts the ability of interior designers to obtain a license.

AMENDMENT REQUESTED: All fees must be specified prior to passage. The Legislature should ensure fee levels do not price out qualified designers from obtaining licensure, which would reduce the pool of licensed professionals and ultimately harm consumers.

6. Provisional Registration Window Is Insufficient — Section 8

Section 8 provides a provisional registration pathway for designers with 10 years of experience but requires passage of the NCIDQ within a 3-year window or revocation of provisional status. This timeline is unrealistic for the following reasons:

- The NCIDQ is a multi-part examination with an approximate pass rate of 53%–61%. Preparation, scheduling, and re-examination cycles routinely take longer than three years, particularly for working designers.
- NCIDQ exam preparation requires 60+ hours of formal interior design education in addition to significant self-study — a substantial financial and time commitment that not all experienced designers can complete within a three-year window.
- GTM's research also shows that degree programs, especially CIDA-accredited ones, are highly competitive with significant attrition rates. Requiring an education-only path to licensure risks excluding qualified, experienced designers — particularly those from underrepresented communities — and would reduce the total pool of licensed designers in the state, increasing costs for consumers.

AMENDMENT REQUESTED: Extend the provisional registration window to a minimum of 5 years. Ensure that multiple pathways to licensure exist for qualified designers, including those who gained competency through experience rather than a formal degree program.

7. Lack of Permitting Authority — Section 7 / Section 302

As currently drafted, S3107 fails to explicitly grant registered commercial interior designers the authority to submit stamped documents directly to local jurisdictions for building permits. In practice, local building inspectors operating under 780 CMR will continue to require an architect or engineer's signature to issue permits for non-structural commercial interior modifications. This omission renders the proposed registration stamp functionally ornamental.

AMENDMENT REQUESTED: Add a provision explicitly stating: 'An official of this Commonwealth, or of any city, town, or county, charged with the duty of issuing permits or enforcing building codes, shall accept plans, specifications, and data for non-structural commercial interior spaces when submitted under the seal and signature of a Registered Commercial Interior Designer.'

8. Amendments Required to Companion Statutes

For S3107 to function coherently, the following companion statutes in Chapter 112 of the Massachusetts General Laws must be amended in parallel:

- Section 60A (Practice of Architecture): Update the definition of the "Practice of Architecture" to explicitly exclude the practice of interior design, so that the two professions have clear, non-overlapping statutory definitions.
- Section 60L: Add a paragraph specifically covering commercial interior designers so they are not inadvertently subject to the square footage limitations and other restrictions applicable to non-architects.
- Section 81D (Practice of Engineering): Update the definition of the "Practice of Engineering" to explicitly exclude the practice of interior design.

Without these companion amendments, commercial interior designers in Massachusetts will face ambiguous and overlapping regulatory frameworks that create legal risk for practitioners and confusion for building officials and permit reviewers.

Conclusion

The Green Tape Measure supports a practice act for commercial interior designers in Massachusetts that is inclusive, equitable, and grounded in evidence. S3107 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.