




The Green Tape Measure

Research. Educate. **Advance.**

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To:

Senator Todd Gardenhire
425 Rep. John Lewis Way N.
Suite 716 Cordell Hull Bldg.
Nashville, TN 37243

April 20, 2026

RE: Opposition to HB 2530 / SB 2224 — Elimination of Interior Design Licensing

Dear Senator Gardenhire,

We are The Green Tape Measure, a volunteer-run data-driven advocacy organization based in North Carolina. While we are not Tennessee residents, we are writing to **oppose HB 2530 / SB 2224** because its termination of interior design licensing eliminates critical public safety protections without evidence supporting deregulation.

SB 2224 / HB 2530 terminates all licensing rules and regulatory requirements for interior designers and removes interior designers from the State Board of Examiners for Architects, Engineers, and Land Surveyors. **This is not a reform—it is complete deregulation.**

The Bill's Own Data Contradicts the Deregulation Argument

The fiscal note (page 4) reveals:

- **304 registered interior designers** are currently licensed in Tennessee
- **\$21,280 in biennial licensing fee revenue** comes from interior designers
- The bill creates a **net increase in state revenue** by eliminating this oversight

This is not justified by public safety evidence; it is revenue-driven deregulation. There is no fiscal note explaining why interior design licensing was failing to protect the public. There is no data showing harm from regulation that justifies its elimination.

Interior Design Involves Critical Health, Safety, and Welfare Decisions

Interior design practice includes decisions that directly impact public health and safety, such as:

- **Fire safety & egress design** — Specifying materials, coordinating exit paths, contributing to the design of emergency egress systems (i.e. creating life safety plans), and ensuring all interior components comply with building codes
- **Accessibility & life safety** — Ensuring ADA compliance, emergency lighting, evacuation routes
- **Air quality & indoor environmental health** — Coordinating ventilation systems, specifying materials that reduce or eliminate chemical off-gassing, designing spaces that promote occupant health and wellbeing
- **Construction** — Designing non-loadbearing partitions, custom millwork, and appropriate bracing and internal support for these elements
- **Electrical** — Creating Power & Data Plans and Reflected Ceiling Plans, specifying fixed lighting, and coordinating with engineers

The data shows these areas are not trivial. GTM analyzed 42 deadly building fires in the United States—all occurring after architecture licensing commenced. ALL were found to result from inappropriate interior finishes, inadequately designed egress, and insufficient life safety coordination.

Interior design is intrinsic to these failures. Deregulating the profession responsible for these safety-critical decisions is the opposite of evidence-based policy.

Licensing Creates Professional Accountability—Eliminating It Removes Consumer Recourse

Tennessee's current interior design licensing provides:

1. **Educational standards** — Requirements ensure practitioners understand building codes, fire safety, and design principles
2. **Examination-based competency** — The NCIDQ exam validates knowledge of health, safety, and welfare standards
3. **Continued professional development** — License renewal typically requires ongoing education
4. **Professional discipline** — Violations of the professional code can result in license revocation, creating accountability

Deregulation eliminates all of these. A consumer with a defective interior design has no regulatory recourse. There is no licensing board to file a complaint against. There is no professional standard that was violated because there is no profession—only unregulated practitioners.

Other States Are Moving Toward, Not Away From, Regulation

The regulatory landscape for interior design is **expanding**, not contracting:

- **New York** (S9673, 2026) is pushing to **streamline** interior designer certification requirements
- **Alaska** (HB 314, 2026) is promoting **registered interior designer licensure** at the state licensing board level
- **Multiple states** are currently considering interior design licensing as a public safety measure

Tennessee would be swimming against the national regulatory tide—abandoning a profession just as other states are establishing it as a regulated discipline.

Voluntary Licensing Doesn't Protect the Public—But Mandatory Licensing Isn't the Only Option

Your concern about "voluntary licensing" (that it doesn't protect the public) is **entirely valid**. GTM agrees: voluntary licensing is insufficient.

However, the solution is not to eliminate regulation entirely; it is to make it mandatory.

The choice is not "voluntary licensing vs. no regulation." The choice is:

- **Mandatory licensure** (highest public protection)
- **No licensure** (no public protection)

SB 2224 / HB 2530 chooses the latter without considering the former.

The Economic Argument Doesn't Justify the Regulatory Gap

The fiscal note cites a **\$21,280 loss in biennial licensing fee revenue** as the impact of deregulation.

This is not a substantial financial burden on the state. If interior design licensing is creating real public safety benefits—which the data suggests it is—the cost of regulation is justified. Instead, the state would lose \$21,280 in revenue *and* lose professional accountability for a profession impacting public health.

This is poor fiscal policy.

Recommended Alternative: Strengthen Licensing, Don't Eliminate It

If the Committee is concerned about interior design licensing effectiveness, we recommend:

1. **Retain interior design licensing** as a mandatory (not voluntary) requirement
2. **Keep interior designers on the State Board** or establish a separate Interior Design Board with adequate representation
3. **Strengthen educational requirements** to ensure practitioners understand building codes and public safety
4. **Require continued professional development** for license renewal
5. **Establish clear enforcement mechanisms** for professional violations
6. **Conduct a formal study** of whether current licensing (for all professions, not just interior design) is protecting public safety—use data to inform policy, not revenue concerns

Closing Statement

Interior design is not a luxury service—it is a profession that impacts how people live, work, and evacuate buildings in emergencies. The interior finishes in your home office determine fire risk. The egress design in your workplace determines survival time in an emergency. The accessibility features in a hospital determine patient safety.

Deregulation eliminates professional accountability for these life-and-death decisions.

Voluntary licensing is insufficient, yes. The solution is mandatory licensing that protects the public. The solution is not to eliminate regulation entirely.

We urge the Committee to reject HB 2530 / SB 2224 and instead consider legislation that **strengthens** interior design licensing in Tennessee.

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

Regards,

A handwritten signature in cursive script that reads "Amy Wright".

Amy Wright
Founder