



June 23, 2026

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

RE: AB 1796 (Jackson) - Oppose

Dear Chair Wahab:

The American Institute of Architects California (AIA CA), an association of over 11,000 architects and design professionals in California, and The American Council of Engineering Companies of California (ACEC California), representing over 400 engineering and land surveying firms and 25,000 professionals in California, write to respectfully oppose AB 1796.

We want to begin by recognizing that interior designers are valued and important members of the broader design and construction community. Architects and Engineers regularly collaborate with interior designers, whose contributions enhance the functionality, aesthetics, and user experience of the built environment. Our concerns with AB 1796 are not about the value of that work, but rather about the structure, implications, and unintended consequences of the proposed licensure framework.

Architects and engineers are both entrusted with protecting the public health, safety, and welfare. Architects fulfill this responsibility through the overall design and coordination of buildings and their systems, while engineers do so through the specialized analysis and design of the structural, mechanical, electrical, civil, and other technical systems within their respective disciplines. Because building design decisions directly impact life safety for the occupants and communities who rely on these spaces, California has historically taken a careful and deliberate approach when establishing or modifying professional licensure frameworks related to the built environment. This issue is particularly important because decisions related to building design directly affect public health, safety, and welfare, and the regulatory structure governing these professions must remain clear and well understood. For this reason, proposals of this nature should be developed through a comprehensive and collaborative process that includes all affected professions, regulatory bodies, and stakeholders.

Concerns regarding the structure of the bill

We have significant concerns with the structure of the proposal.

The creation of new titles such as “Commercial Interior Designer” or “Professional Interior Designer” is likely to create confusion for consumers, particularly given the lack of a clear definition of “commercial” and the implication that other interior designers are not professionals.

Additionally, the proposal bifurcates the design industry into two separate titles and two oversight structures. The professions of architecture, engineering, and landscape architecture do not operate under such divisions or hierarchies.

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The Council for Certified Interior Designers (CCIDC) would continue to exist as a separate entity outlined in the law under this proposal and would continue to certify interior designers who could submit plans on the same projects as the newly formed “licensed professional interior designer,” who would be licensed and regulated separately by the California Architect Board. We believe that this would be incredibly confusing for consumers.

While the California Council for Interior Design Certification currently offers a voluntary “commercial designation,” it does not establish a separate scope of practice. Even so, this designation has demonstrated the potential to create confusion, underscoring the risks of formalizing a more complex structure in statute.

Clarifying the Underlying Need for Regulatory Change

While we are open to the conversation surrounding what the best regulatory structure may be, data and information have not been provided around what risk to public health, safety, or welfare exists under the current system that would necessitate creating a new licensure framework?

For several years, we have heard anecdotally that the rationale for this legislation stems from situations in which construction documents prepared by interior designers were not accepted by a small number of authorities having jurisdiction. There is a lack of clarity regarding the underlying causes of these reported rejections by jurisdictions, as no data or supporting evidence has been presented as part of the licensure discussions. In practice, plan rejections occur for a wide range of reasons and are a routine part of the construction document review process in California. It has not been demonstrated whether interior designers are subject to a different regulatory standard than other licensed professionals, whether their submissions fail to meet applicable code requirements, whether they fall outside the scope permitted under current law, or whether the issue is simply a function of their unlicensed status within the existing regulatory framework.

Notably, evidence presented by the California Council for Interior Design Certification at the last hearing of the California Architects Board indicated that these instances appear to be relatively rare and that most have since been resolved.

Before pursuing a major and costly structural change to California’s professional licensing framework, it is important that the proponents clearly identify and document the underlying risk to public safety and benefit to consumers and demonstrate why the proposed solution is necessary.

Need for meaningful stakeholder collaboration

We believe a more robust and inclusive stakeholder process is necessary before moving forward with legislation of this magnitude. To date, that level of engagement has not occurred, including during the interim period following the sunset review process when stakeholders were directed to work together.

In other states where similar changes have been considered or implemented, efforts have involved extensive stakeholder engagement over many months, and in some cases years. Many of those states were working from a less defined regulatory framework than California’s, making it even more important that any changes here be approached through a deliberate and well-vetted process.

Significant unresolved implementation questions

Even if structural concerns were addressed, substantial questions remain that require further analysis and stakeholder input, including:

- Whether the framework is insurable
- Whether it can be effectively regulated

- Whether it creates confusion for the public
- How it aligns with education, experience, and examination standards

Any expansion of permitting authority for nonstructural and nonseismic elements, as currently defined in Title 24 California Code of Regulations, California Building Standards Code, must be paired with appropriate liability, insurance, and education requirements.

Responsible control and project coordination

California law recognizes architects as the licensed professionals responsible for coordinating building design and integrating multiple systems into a cohesive whole. This role carries significant responsibility and liability. While other licensed professionals—such as civil engineers, landscape architects, and contractors—may lead projects within their respective scopes, any proposal that alters permitting authority or introduces new roles must clearly define responsibility and accountability within the project delivery structure.

California's unique building code considerations

The California Building Standards Code includes complex and rigorous seismic safety requirements that apply to both interior and exterior elements of buildings. Any proposal affecting design responsibilities must ensure alignment with these standards and be evaluated through careful technical analysis.

Conclusion

For these reasons, AIA California and ACEC California must respectfully oppose AB 1796. We remain open to engaging in a more comprehensive and collaborative stakeholder process to better understand the issues and develop thoughtful solutions that protect public safety while supporting all members of the design community.

We appreciate your consideration.

Sincerely,



Scott Terrell
Director of Government Relations



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