



October 30, 2017

Maureen Ohlhausen, Acting Chairman
Federal Trade Commission
600 Pennsylvania Ave. NW
Washington, DC 20580

Dear Chairman Ohlhausen and Members of the Task Force:

Thank you for the opportunity to provide comments on the Federal Trade Commission (FTC) Economic Liberty Task Force and the issues being discussed as the agency considers initiatives to enhance occupational license portability.

The International Interior Design Association (IIDA) represents 15,000 members across the U.S. and around the world who practice commercial interior design. Our members design and oversee interior projects for both renovations and new build in the commercial space, which includes healthcare, hospitality, retail, office spaces, K-12 education, higher education, and institutional spaces. Our members' projects range from trendy Silicon Valley offices to local elementary schools to community hospitals and more.

Commercial interior design is unique among many regulated professions as it developed as an industry post-World War II. As such a new and evolving profession, it is often misunderstood and confused with HGTV renovations and residential decorators. Anyone may call themselves an interior designer; however, to be a registered interior designer typically one must complete a four-year degree in interior design or interior architecture, pass a nationally recognized exam, and have two years of supervised commercial interior design experience. These designers are often trained in the same schools as architects at public universities. Whereas structural engineers deal with the safety and resiliency of the frame of a building, and whereas an architect creates an overall concept and look of a building, our members create the way people interact with and use public spaces. A well-designed hospital can increase positive health outcomes for patients; a well-designed school can create better education experiences, particularly for special needs students; a well-designed office can attract talent and improve the bottom line for the company.

IIDA advocates for a voluntary certification for commercial interior designers. We recognize we cannot protect the title of "interior designer" and that we should reduce as many barriers to entry as possible, while recognizing that the built environment is becoming more complex and requires additional training and education. IIDA does not advocate for full licensure, which is to say that if one wants to practice any kind of interior design they must be licensed with the state. Furthermore, we support the National Council for Interior Design Qualification exam as the basis for testing in all states to increase portability across state lines. Like many peer professions in the built environment, a commercial interior designer may be based in one state, but work frequently across state lines and even international borders. We actively pursue legislation that includes reciprocity language and support legislation that makes it easier for military spouses to pursue registration or certification as an interior designer.

We further recognize that registration and licensure is a state issue and should remain as such. However, we understand the need to increase mobility and use of voluntary registrations across state lines. IIDA actively engages with state boards and regulatory departments to ensure we create no unnecessary burden on commercial interior designers or those wishing to become commercial interior designers.

As mentioned above, our membership strives to better the profession as it evolves over time and to enhance opportunities to share with others what commercial design is and how they can become commercial interior designers. Thank you for the opportunity to comment and share our unique perspective.

Sincerely,



Emily Kluczynski
Director of Advocacy and Legislative Affairs
International Interior Design Association (IIDA)