

Preliminary Evaluation of the State Board of Certified Interior Designers

Recommendations: Waive from Full Evaluation

Extend Termination Date by 10 Years to July 1, 2024

**Make the State Occupational and Professional Licensing
Design Boards' Fund Permanent**

The Sunset Review Process

This evaluation was undertaken under the auspices of the Maryland Program Evaluation Act (§ 8-401 *et seq.* of the State Government Article), which establishes a process better known as “sunset review” because most of the agencies subject to review are also subject to termination. Since 1978, the Department of Legislative Services (DLS) has evaluated about 70 State agencies according to a rotating statutory schedule as part of sunset review. The review process begins with a preliminary evaluation conducted on behalf of the Legislative Policy Committee (LPC). Based on the preliminary evaluation, LPC decides whether to waive an agency from further (or full) evaluation. If waived, legislation to reauthorize the agency typically is enacted. Otherwise, a full evaluation typically is undertaken the following year.

The State Board of Certified Interior Designers last underwent a preliminary evaluation as part of sunset review in 2001 – the first sunset evaluation since the board’s creation in 1991. The evaluation found that, although the board was successfully fulfilling its responsibilities to the best of its abilities, the limited nature of the statutory structure prohibited the board from regulating the practice of the profession as a whole and raised the question of whether doing so was necessary to maintain and protect public welfare and safety. Accordingly, the board underwent a full evaluation in 2002. Numerous findings and recommendations arising from that evaluation will be discussed in greater detail later in this report. Ultimately, Chapter 227 of 2003 extended the board’s termination date by 10 years to July 1, 2014.

In conducting this preliminary evaluation, DLS staff reviewed applicable State law and regulations; recent legislative and regulatory actions; board minutes; prior sunset reviews; and other information provided by the board regarding revenues, expenditures, examinations, licensing, complaints, and disciplinary actions. In addition, DLS staff interviewed or corresponded with current and former members of the board; the executive director; board administrative staff; the Deputy Commissioner of Labor, Licensing, and Regulation; the Executive Director of the National Council for Interior Design Qualification (NCIDQ); and representatives of the Maryland Coalition of Interior Designers.

The board reviewed a draft of this preliminary evaluation and provided the written comments attached at the end of this document as **Appendix 2**. Appropriate factual corrections and clarifications have been made throughout the document; therefore, references in board comments may not reflect the final version of the report.

The Interior Design Profession

The interior design professional plans and designs interior residential, institutional, and commercial building spaces. More specifically, interior designers prepare and administer design documents, including drawings, schedules, and specifications, which pertain to furnishings, layouts, fixtures, cabinetry, lighting fixtures, finishes, materials, and interior construction not materially related to or materially affecting building systems. The work must comply with applicable laws, codes, regulations, and standards. The scope of work performed by an interior designer may not be construed as authorizing the practice of architecture or engineering as defined under Maryland law, but interior designers may be involved in the movement of nonload-bearing walls as long as there is no material impact on building systems. The practice includes access and egress planning and barrier-free planning for individuals with disabilities. Knowledge of building codes and standards and knowledge of product properties, including flammability, toxicity, slip-resistance, indoor air quality, ergonomics, illumination, and acoustics, are also aspects of the profession.

Certified interior designers in Maryland may also perform “design coordination” for a project or portion of a project as long as they hold a current certificate issued by the board and have adequate experience and knowledge to achieve the objective of the project or portion of the project being coordinated. Design coordination is the review and coordination of services provided by certified interior designers, architects, professional engineers, landscape architects, and professional land surveyors. Certified interior designers must state in each of the interior design documents that the document is not an architectural or engineering drawing, specification, or design and is not to be used for construction of any load-bearing column, framing, wall, or structure.

Although the terms “interior design” and “interior decorating” are often used interchangeably, the two practices differ. Interior designers create functional building spaces, while interior decorators focus more on furnishings, color schemes, fabrics, etc. NCIDQ emphasizes that one primary difference between the two professions is that interior designers are responsible for the elements of design that affect the health, safety, and welfare of the public. NCIDQ offers the example that, while an interior designer can evaluate wall finishes based on criteria such as durability, acoustic properties, flame retardancy, and toxicity, an interior decorator can evaluate finishes based only on color, style, and texture.

NCIDQ is the national organization setting standards for interior design professionals. Passing the NCIDQ examination is required for certification as an interior designer in Maryland. Most states that regulate the interior design profession, including Maryland, are members of NCIDQ.

Regulation of Interior Design

Interior designers in Maryland operate pursuant to a “title act.” A title act contains a statutorily defined scope of work that includes examples of the types of services provided by members using the protected title. A title act does not preclude other individuals from performing the same services as long as they do not use the protected title to describe themselves or their work. In Maryland, the protected title is “certified interior designer.” In contrast, a practice act defines activities that require specialized education, training, and examination before an individual is granted the right to perform those activities and limits the ability to perform those activities to those granted licensure or certification under that act. Individuals granted rights under a practice act must satisfy statutorily defined criteria. An unlicensed or noncertified individual would be in violation of the practice act if they performed the duties of a licensed or certified individual.

Approximately half of the jurisdictions within the United States, including the District of Columbia and Puerto Rico, regulate interior design professionals. According to NCIDQ, four states (Alabama, Florida, Louisiana, and Nevada) and the District of Columbia have practice acts. The remaining jurisdictions (including Virginia) have title acts. Delaware and Pennsylvania are among the states that do not regulate interior designers. Mississippi, the most recent state to regulate the profession, will operate under a title act. HB 1168 of 2009 proposed establishing a practice act in Maryland, but the bill was withdrawn.

The State Board of Certified Interior Designers

Chapter 663 of 1991 (the Maryland Certified Interior Designers Act) established the State Board of Certified Interior Designers, which regulates the title of “certified interior designer.” As noted above, the Act and the board do not pertain to interior designers who do not use the title “certified interior designer.” The Act also does not apply to architects.

The board is one of five “design boards” under the Department of Labor, Licensing, and Regulation’s (DLLR’s) purview.¹ The interior design board is the only design board that does not operate pursuant to a practice act. The board consists of seven members: five certified interior designers, one licensed architect who provides interior design services, and one consumer. All five interior designer members must have at least five years of experience immediately prior to appointment. The architect member must have practiced in the State for at least five years immediately before appointment. The consumer member may not be licensed or otherwise subject to regulation by the board, may not be required to meet the qualifications for the professional members of the board, and may not, within the year before appointment, have had a financial interest in or have received compensation from a person regulated by the board. In addition, while serving as a member of the board, a consumer member may not have a financial interest in or receive compensation from a person regulated by the board, or grade any examination

¹The five design boards are the State Board of Architects, State Board of Certified Interior Designers, State Board of Examiners of Landscape Architects, State Board for Professional Engineers, and State Board for Professional Land Surveyors.

given by or for the board. Although the inclusion of a board member from another discipline is unusual for Maryland (*i.e.*, none of the other design boards has a member from another design profession), NCIDQ estimates that 13 of its member jurisdictions have joint boards with architects.

All members of the board are appointed by the Governor and serve three-year staggered terms that begin on July 1. Board members continue to serve after their term has ended until a successor is appointed. Although board members do not receive compensation, they are eligible for reimbursement of expenses. The Governor may remove a member for incompetence or misconduct. Pursuant to one of the recommendations in the 2002 full sunset evaluation of the board, a member may serve no more than three consecutive years as an officer of the board. The board has two vacancies at this time (one certified interior design member and the architect member); both positions have been vacant since May 2011. The board generally meets four times each year. The board meets less often than other design boards; however, the meeting frequency seems to be adequate for the work of the board. If the board were to enhance consumer outreach or undertake any initiatives, additional meetings might be necessary.

DLS noted in the 2001 preliminary evaluation that the board seemed to spend a considerable amount of time reviewing which courses should be approved for use as continuing education credits. Although the board minutes from the past three years still reference this issue, the board has streamlined the process in recent years. For example, after noting in the May 14, 2008 board meeting that a lengthy discussion of every application for continuing education course approval seemed unnecessary, a process was developed to allow the continuing education committee to make recommendations to the board for approval or denial that may be voted on without discussion. Applications presenting unique issues or problems may still be brought to the full board and discussed. The board also maintains a list of approved courses on its website.

Shared Staffing Sufficient for Board Needs

The board has four regular and two contractual staff members available to it. One position, board secretary, is shared with the State Board for Professional Engineers. All other positions, which are the executive director, an assistant executive director (this position has been vacant since August 2011), an investigator, and two contractual employees – an office secretary and an outreach coordinator – are shared among all of the design boards. The board also receives legal assistance from DLLR and other clerical and licensing assistance from the central staff of the Division of Occupational and Professional Licensing within DLLR. Though staffing is shared, it appears sufficient to meet the administrative needs of the board, assuming that the assistant executive director position does not remain vacant.

Legislative Changes Affecting the Board Since the 2001 Preliminary Sunset Review

As shown in **Exhibit 1**, only a handful of legislative changes have affected the board since the last preliminary sunset review in 2001. Chapter 383 of 2002 requires certified interior designers to obtain a seal to endorse documents. Certified interior designers must sign, seal, and date any interior design documents submitted to clients or public authorities. By placing the seal and signature on design documents, the certified interior designer certifies that he or she has exercised professional judgment in making decisions as to all matters contained within the document and that he or she prepared them or directly controlled and supervised their preparation. The ability to use this seal is extended only to interior designers who are certified by the board to use the title “certified interior designer”; other individuals practicing interior design cannot use the seal. Similarly, other regulated design professionals use seals to certify their documents. The board is authorized to reprimand a certificate holder or suspend or revoke a certificate if the certificate holder signs or seals any interior design documents after the certificate holder’s certificate has expired or has been suspended or revoked.

Chapter 129 of 2005 lowered the standard for disciplinary actions against certificate holders by removing the requirement that an individual “knowingly” committed a violation. Chapter 129 also broadened the scope of violations for which the board may take a disciplinary action by making a violation of any regulation adopted by each board to be the basis for a disciplinary action.

As previously mentioned, the board underwent a full sunset evaluation in 2002. Following that evaluation, DLS concluded that continued regulation of certified interior designers was unnecessary because there was no risk of serious injury or financial damage to the public from the unregulated practice of the profession. Accordingly, DLS recommended that the General Assembly repeal the board and provide for the phase out of certification for current certificate holders. However, the same report presented an alternative series of recommendations by DLS if the General Assembly chose to continue protecting use of the title of “certified interior designer.” Term limits for the board members were recommended as was better recordkeeping and more outreach. Other recommendations concerning all of the design boards will be discussed later in this report. Ultimately, the alternative series of recommendations was adopted, and Chapter 227 of 2003 extended the termination date of the board by 10 years to July 1, 2014.

Exhibit 1
Major Legislative Changes Since the 2001 Preliminary Sunset Review

<u>Year</u>	<u>Chapter</u>	<u>Change</u>
2002	383	Requires certified interior designers to obtain a seal and to sign, seal, and date any interior design documents submitted to clients or public authorities. Authorizes the board to take disciplinary action against a certificate holder who signs or seals a document after the certificate has expired or has been suspended or revoked.
2003	227	Extends the termination date of the board by 10 years from July 1, 2004, to July 1, 2014. Requires the chairs of the five design boards to meet annually to discuss issues of mutual importance and post a joint newsletter on the DLLR website. Establishes a State Occupational and Professional Licensing Design Boards' Fund, a special fund for the collection of license and permit fees from the five design boards. Repeals license and permit fees set in statute and instead requires the Secretary of Labor, Licensing, and Regulation to calculate the direct and indirect costs attributable to each of the design boards and to establish fees based on those calculations. Caps any fee increase by a design board at no more than 12.5% annually.
2005	129	Lowers the standard for specified disciplinary actions against a certified interior designer applicant or licensee by removing the requirement that an individual "knowingly" committed a violation. Broadens the scope of violations by making a violation of any regulation the basis for a disciplinary action.
2008	273	Extends the termination date to June 30, 2013, for the special fund that serves all five design boards and related provisions, including the board's fee-setting authority.

Note: The five design boards include State Board of Architects, State Board of Certified Interior Designers, State Board of Examiners of Landscape Architects, State Board for Professional Engineers, and State Board for Professional Land Surveyors.

Source: Laws of Maryland

DLLR Design Boards Work Cooperatively and Share Special Fund

As mentioned previously, there are five design boards within DLLR, including the State Board of Certified Interior Designers. The other boards regulate architects, landscape architects, professional engineers, and professional land surveyors. Chapter 227 of 2003, which extended the board's termination date, also established the State Occupational and Professional Licensing Design Boards' Fund as a special, nonlapsing fund in DLLR. One of the major goals of this Act was to cluster the design boards, since they regulate similar types of professions, in order to equalize the licensing fees among the design professions. Through this clustering approach, the Act required the design boards to work more cooperatively together through a Joint Chairs Committee. The creation of the special fund and the formalization of the Joint Chairs Committee were implemented in response to recommendations made by DLS in the 2002 full sunset evaluation of this board. The special fund will be discussed in greater detail later in this report.

Chapter 227 of 2003 also requires that the chairmen of each of the five design boards meet annually to discuss issues of mutual importance and publish a joint newsletter. The Joint Chairs Committee meets several times a year and has proven to be a useful and efficient way for the design boards to communicate amongst themselves and with DLLR. **The Joint Chairs Committee serves as an effective forum for the design boards to share ideas, work cooperatively, and support the combined interests of the design industry as a whole in the State.**

Certification of Interior Designers

To be eligible for certification, an individual must meet the education and experience requirements necessary to qualify and pass the NCIDQ exam. Prior to sitting for the exam, a candidate must have a combination of six years of education and work experience, which can be accomplished through several different paths. The board does not administer the exam, but its membership in NCIDQ guarantees that at least one exam will be offered annually within the State. Although the exam covers a broad range of matters that interior designers use in their daily practice, it only tests knowledge and skills that protect public health, safety, and welfare (*e.g.*, design history and furniture styles are not covered). Approximately every five years, NCIDQ surveys practicing professionals to identify and ensure that the exam reflects changes in interior design practice. Its last practice analysis was in 2008. Based on that data, the current exam consists of the following three sections, all of which must be completed to pass the exam:

- **Section 1. Codes, Building Systems, Construction Standards, and Contract Administration.** This is a multiple choice test consisting of 150 questions. The knowledge and skills tested in this section include code requirements such as accessibility guidelines; building systems and construction; measuring, drafting, and technical drawing conventions; and construction documents and architectural woodworking.

- **Section 2. Design Application, Project Coordination, and Professional Practice.** This is also a multiple choice test with 150 questions. It addresses topics including sustainable design practices; written and verbal design communication methods and techniques; business practices and ethics; the relationship between human behavior and design; and site analysis procedures.
- **Section 3. Practicum.** Candidates are given a series of exercises covering space planning, lighting design, egress, life safety, restroom design, systems integration, and millwork design. Candidates must produce plan drawings and develop appropriate specifications and schedules. Work product must address codes and the principles of universal design.

Certification by Reciprocity

The board may waive the examination requirement for an individual licensed or certified as an interior designer in another state having similar requirements to Maryland's. However, the individual has to pay the application fee; the applicant's home state has to provide reciprocity; and the applicant's home state certification or licensing requirements have to be substantially equivalent to Maryland's. Although the board does not keep data on how many reciprocal certificates it has issued, DLLR staff indicated that few have been issued.

Certificates Renewed on a Biennial Basis; Continuing Education Required

Certificates must be renewed on a biennial basis. Certificate renewal can be done electronically through the DLLR website, and there is a renewal fee of \$68. For late renewals by individuals, there is a \$100 reinstatement fee.

One continuing education unit (CEU) is required for a timely renewal and certified interior designers must earn two CEUs in the two-year period immediately preceding a reinstatement request. One CEU equals 10 hours of study. Regulations require that the course must contribute directly to the enhancement of professional competency of an individual to provide interior design services and have the protection of health, safety, and welfare of the public as a clear purpose and objective. Marketing courses, unless otherwise determined by the board, are generally not approved for CEUs. At the October 3, 2008 board meeting, after noting that a similar requirement had been adopted in Texas, it was recommended that the board amend its regulations to require one hour of "sustainable design" education. This regulation was finalized June 29, 2009 (Code of Maryland Regulations, 09.18.03.02-03).

When individuals renew their certificates online, approximately 5% to 10% of applications are randomly selected to be audited. Those individuals must submit proof of compliance to the board. The board voted at its July 19, 2010 meeting, to propose regulations to make it a violation of the code of ethics to fail to respond to a communication from the board. Regulations to this effect were finalized June 13, 2011 (Code of Maryland Regulations, 09.18.02.07).

Certification Activity Has Remained Relatively Stable

Exhibit 2 shows certification activity for fiscal 2007 through 2011. During that five-year period, the board issued almost 130 original certificates and renewed over 650. Although the number of original certificates issued spiked in fiscal 2008 before leveling off, board staff cannot recall any specific reason for the increase. DLS notes that due to the two-year renewal cycle, the spike in original licensing should have equated to a higher number of renewals in fiscal 2010; however, renewals in fiscal 2010 were instead on par with fiscal 2008 renewals. Although the board could not conclusively explain the attrition rate, several members did note that the economic environment has hit the design industry hard and could explain the lack of renewals to some extent.

Exhibit 2 Certification Activity Fiscal 2007-2011

	<u>FY 2007</u>	<u>FY 2008</u>	<u>FY 2009</u>	<u>FY 2010</u>	<u>FY 2011</u>	<u>Total</u>	<u>Average</u>
Certificates – Original	19	37	23	25	24	128	26
Certificates – Renewal	112	145	126	146	138	667	133

Source: State Board of Certified Interior Designers

As of November 4, 2011, there were 315 active certificate holders in the State. As a point of reference, there were 288 certificate holders at the time of the 2002 sunset evaluation. One recommendation from that evaluation was for the board to improve its recordkeeping related to the number of interior designers. Information regarding certification activity was readily available from the board for this sunset evaluation, and minutes from prior board meetings indicate that DLLR staff gives the board updates on the current number of certificate holders at each board meeting.

Board Receives Few Complaints Against Certified Interior Designers

The board has the right to fine, reprimand, suspend, or revoke the certificate of a certified interior designer who obtains or uses the title fraudulently or deceptively or who violates any of the regulations relating to the board. Regulations include a code of ethics, which gives the board the authority to hear complaints pertaining to the unprofessional practice of interior design by certified interior designers. Due to the nature of the act governing certified interior designers, the board has no authority to hear complaints of any kind concerning the practice of interior design by noncertified interior designers. According to board staff, the board has received only two complaints in the past five fiscal years. One involved an allegation of an ethics violation,

while the second involved misrepresentation. Both complaints were closed with no action.

Available Financial Resources Cover Board Operations

As discussed earlier, a pilot program established by Chapter 227 of 2003 created a State Occupational and Professional Licensing Design Boards' Fund to ensure that costs for the five design boards, in the aggregate, were covered by their revenues, in the aggregate. The fund and fee-setting authority were set to terminate on June 30, 2008; however, Chapter 273 of 2008 extended the termination date for the special fund to June 30, 2013. Prior to the enactment of Chapter 227, the fees for the board were set in statute, the revenues were credited to the general fund, and the Governor included a general fund appropriation for the board within the budget of DLLR.

Since 2003, the Secretary of Labor, Licensing, and Regulation has been charged with annually calculating the direct and indirect costs attributable to each of the design boards and providing this information to the boards. With consent of the boards, the Secretary is authorized to average the direct and indirect costs among the boards in order to establish fees that more equitably distribute the costs associated with the operation of each board across all five boards. With these calculations in mind, the board is charged with setting reasonable fees for its services by regulation. The fees charged are required to be set so as to produce funds to approximate the cost of maintaining the boards and may not be increased more than 12.5% over the previous year's fees.

In 2007, the design boards determined that the fund balance merited a fee reduction, and the across-the-board license fee of \$78 was reduced to the current fee of \$68. Prior to the enactment of the special fund, the board charged a \$50 application fee and a \$150 fee for an original certificate. Renewal fees were \$200. **Appendix 1** provides the board's current fee schedule.

As shown in **Exhibit 3**, although the board's revenues have never been sufficient to cover expenditures, when the board's revenues are combined with the revenues of the other design boards, it does not actually operate with a deficit. This was the legislative intent of Chapter 227, which created the special fund. The fiscal 2011 ending balance for the fund was \$240,691. It should also be noted that the Budget Reconciliation and Financing Act of 2010 (Chapter 484) redirected \$300,000 from the design boards' special fund to the general fund in fiscal 2010. **Because the design boards have demonstrated the ability to properly maintain the special fund, DLS recommends that legislation be enacted to make the special fund permanent.**

Exhibit 3
Fiscal History of the State Board of Certified Interior Designers
Fiscal 2007-2011

	<u>FY 2007</u> ¹	<u>FY 2008</u>	<u>FY 2009</u>	<u>FY 2010</u>	<u>FY 2011</u>
Total Revenues	\$14,370	\$15,766	\$13,850	\$13,854	\$15,586
Total Costs	117,060	37,957	40,814	50,290	34,854
Direct Costs	97,413	29,461	26,305	40,432	28,175
Direct Legal Costs	6,961	6,091	11,924	7,072	3,631
Indirect Costs	12,686	2,405	2,585	2,786	2,498
Surplus/(Deficit)	(\$102,690)	(\$22,191)	(\$26,964)	(\$36,436)	(\$19,268)

¹Prior to fiscal 2008, there was significant variation in accounting for direct costs and indirect costs for all of the design boards. DLLR advises that there were issues in the board's budget (as with the budgets for other design boards) for these years because the department was implementing new accounting standards and bringing on a new accounting team.

Source: Department of Labor, Licensing, and Regulation

The board's direct costs include salaries and benefits for staff, office supplies, and legal fees from the Office of the Attorney General within DLLR. Costs incurred at the level of the Division of Occupational and Professional Licensing (including central licensing, the telephone center, the commissioner's office, and information technology costs) are coded as reimbursable funds and are also included within the board's direct costs, consistent with guidance from the Department of Budget and Management. The board's indirect costs are incurred at the departmental level and include costs for activities and services related to budget, personnel, general services, and the Office of the Secretary.

Revenues and expenditures for the board have been relatively constant since fiscal 2008 when the new accounting standards were implemented. Higher revenues in fiscal 2007 were due to the higher fees that were charged prior to the fee reduction, while higher revenues in fiscal 2008 corresponded with the increase in certificates issued that year. Revenues were also higher in fiscal 2011 due to a high number of late renewals (16).

Legal fees were particularly high in fiscal 2009, which DLLR staff indicated was due to regulations that were prepared during that timeframe, as well as the increased need for legal services resulting from the "practice act" legislation that was introduced in the 2009 session. Direct costs for the board were also higher than usual in fiscal 2010. DLLR indicates that direct costs were higher that year in part because the board was fully staffed; while in other fiscal years there were some vacancies that resulted in lower personnel costs (e.g., the outreach coordinator position was vacant during most of fiscal 2011 and the executive director position was vacant

during portions of fiscal 2011 as well). In addition, two years of annual dues for NCIDQ (\$3,625) were paid during fiscal 2010, which also helps account for the higher direct costs that year.

Recommendations

Although the work of the board is limited by the current statutory “title act” structure, the board is fulfilling its statutory duty of protecting the title of “certified interior designer.” The board has taken steps to ensure that members of the public who choose to engage the services of a “certified interior designer” are afforded the most protection possible, by monitoring compliance with continuing education requirements and taking steps to make sure that the requirements stay current, as evidenced by the adoption of the “sustainable design” regulation. The board has also improved outreach specific to interior designers by improving its website and participating in design conferences and exhibitions. It has also made efforts to improve educational opportunities in the State for prospective interior design students by initiating communication with schools to develop interior design programs. Furthermore, the implementation of the Joint Chairs Committee and its newsletter has improved communication to the design community as a whole. Including certified interior designers in the cluster of design boards enhances design coordination on projects and allows opportunities for consumer protection by requiring and regulating the use of the seal. Finally, past actions of the General Assembly appear to indicate the intention to continue the board and its regulation of certified interior designers as a title act. **Consequently, DLS recommends that LPC waive the board from full evaluation and that legislation be enacted to extend the board’s termination date by 10 years to July 1, 2024, and to make the design boards’ special fund permanent.**

Appendix 1. Schedule of Fees for the State Board of Certified Interior Designers

License Fees

<u>Type of License</u>	<u>Fee</u>
Interior Design Certificate Fee – New and Biennial Renewal	\$68
Application Fee	35
Reinstatement of Certificate	100
Reciprocal Certificate Application Fee	50

National Council for Interior Design Qualification (NCIDQ) Fees¹

<u>Initial Fees</u>	<u>Fee</u>
Application Review Fee	\$165
<u>Exam Fees Per Section</u>	
Section 1. (Codes, Building Systems, Construction Standards, and Contact Administration)	255
Section 2. (Design Application, Project Coordination, and Professional Practice)	255
Section 3. (Practicum)	390

¹These fees are set by and paid directly to the National Council for Interior Design Qualification.

Source: Code of Maryland Regulations, 09.18.01.03; National Council for Interior Design Qualification

**Appendix 2. Written Comments of the
State Board of Certified Interior Designers**

December 1, 2011

Ms. Jennifer B. Chasse
Senior Policy Analyst
Office of Policy Analysis
Department of Legislative Services
90 State Circle
Annapolis, MD 21401-1991

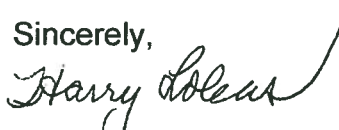
Dear Ms. Chasse:

The Department of Labor, Licensing and Regulation (DLLR) has received the draft report of the preliminary evaluation of the State Board of Certified Interior Designers (Board). We appreciate the time and attention that was spent reviewing the Board's operations.

We are pleased that the evaluation found that the Board is fulfilling its statutory duties and has recommended that the Legislative Policy Committee waive the Board from full evaluation and that legislation be enacted to extend the Board's termination date by 10 years until July 1, 2024. We are further pleased that the efforts of DLLR and the Design Boards to effectively utilize and maintain the special fund have been recognized and resulted in the recommendation that the Occupational and Professional Design Boards' Fund become permanent.

As requested, we have separately provided any factual corrections that have been identified to Jennifer Botts. We would like to express our appreciation for the thoroughness and professionalism of your staff in conducting the evaluation. Should there be any additional questions concerning the Board of Certified Interior Designers or the Special Fund, please do not hesitate to contact me (410-230-6226) or Executive Director Pamela Edwards (410-230-6262).

Sincerely,



Harry Loleas
Deputy Commissioner

cc: Alexander M. Sanchez, Secretary
Stanley J. Botts, Commissioner
Pamela J. Edwards, Executive Director
Chair and Members, Board of Certified Interior Designers
Design Board Chairs
Jill Porter, Legislative Director
Karl S. Aro

TTY USERS, CALL VIA THE MARYLAND RELAY SERVICE
INTERNET: WWW.DLLR.STATE.MD.US • E-MAIL: OP@DLLR.STATE.MD.US