I, Katherine Setser, hereby submit this original work as part of the requirements for the degree of Master of Science in Architecture in Architecture.

It is entitled:
Fighting Fire with Fire: Redefining the Interior Design Value Proposition

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Fighting Fire with Fire:
Redefining the
Interior Design Value Proposition

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Abstract

According to the interior design professionals’ codes of ethics, the first priority of interior designers is the protection of the health, safety, and welfare of the public in the built environment. This responsibility is paramount and the dangers very real. According to The Geneva Association, the U.S. is among the deadliest of industrialized nations, despite the fact that it outspends all others on building fire protection by a factor of ten or more. The National Fire Protection Association (NFPA) and numerous fire commissions consistently find that proper selection, specification, arrangement, and/or installation of interior finish materials and other interior space content such as furniture, fixtures, and equipment – the very issue with which interior designers grapple daily – are significant contributors to the loss of life and property.

Yet, the interior design profession has not succeeded in making an effective jurisdictional claim to public protection of health, safety, and welfare in interior environments. This failure is not for lack of effort; the interior design profession has made significant strides in defining itself and its specialized expertise, documenting and disseminating its body of knowledge, and linking specialized tasks and research outcomes to the expertise of the profession. Rather, the obstacle appears to be a failure to articulate its definition and expertise in concrete, observable, demonstrable terms that take into consideration marketplace culture: the behavior, delivery systems, vernacular language, and the values of its various audiences. In short, it is a failure to recognize an existing and distinct cultural gap between interior design and other design practices.
(architecture, engineering, interior decoration and decorative arts), a gap that permits – even promotes – misperceptions or misinterpretations of its value.

This work first explores the practice-related and cultural gaps that prevent the presentation (both fact and form) of evidence of harm most recognized by allied licensed professions in their own path to licensure, and investigates alternative data that provides compelling evidence of a causal relationship between interior space content and irreparable harm to the occupants in public and high-risk occupancies. Study methodologies for this portion of the work include case study analysis of select NFPA fire investigations, detailed analysis of NFPA annualized fire data, and comparative analysis of preliminary data published in 2010.

Second, this study evaluates the relationship between the current delivery system for interior design services and the existing regulatory protections and customary design practice standards in order to determine their effectiveness in mitigating risk to the public caused by interior design content. Included in this examination are the customary regulatory review and permitting process, the timing and overlap of architectural and interior design services, and the effective coverage of interior design regulation, professional credentialing, professional certification, and the accreditation of educational programs with respect to the protection of public health, safety, and welfare in interior environments.

Implications of this study include the identification of existing impediments to productive collaboration by regulatory officials, allied professionals, and those within the...
interior design industry and related educational systems necessary to acknowledge and accept an expanded model of responsibility.
Acknowledgements

When I made the decision to return to school after 25 years of practice, some 25 years since I had been a (formal) pupil, I considered it very much a luxury. The luxury to read what I want, write what I want, investigate what I want. The luxury to devote time to considering issues that simply warrant further consideration, a definite rarity when, as professionals, we work for a clientele that is largely in pursuit of its own agenda. And, while the luxury didn’t always extend as far into other aspects of my life as they did in my imagination (for academic life is every bit the chaos and commotion of life on the “outside,” replete with all-nighters and ramen noodles), my decision to return to the academy did not disappoint. I have many folks to thank for that.

My Committee and Mentors. Dr. Edson Roy Cabalfin, Dr. Patrick A. Snadon, and Henry P. Hildebrandt; fonts of knowledge and experience, generous souls, and trusted friends. Oh yeah, and patient. I cannot forget patient. I probably should have listed patience first. I would also like to express my gratitude to Drs. Denise A. Guerin and Caren S. Martin for their encouragement and reinforcement of the importance and validity of my research direction.

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My inner circle. Dick Overton, my husband, one of the most supportive, patient, and flexible fellows I know. I am sorry that you’ll no longer be able to boast that you are sleeping with a graduate student. Clay Hickerson, my Nashville business partner, one of the other most supportive, patient, and flexible fellows I know. Sue’s Girls (you know who you are), without whom I couldn’t have mustered the courage to embrace the adventure. And last but not least, Mother and Daddy. They not only survived my inquisitive nature, they cultivated it.
Preface

There is a space that you soar into, the space that you sometimes break through, to hang in. A sort of grasp or gap.

-Selima Hill

I came to this work – or the kernel of this work – initially out of sheer desperation. It was 2006 and I had been appointed to serve on the Interior Design Legislation Study Committee by the Tennessee Board of Architectural and Engineering Examiners, charged with the task of representing the interior design profession to this group of diverse design professionals. Members of the committee represented architects, engineers, landscape architects, code officials, and interior designers. The Committee was charged with three tasks: 1) the examination of the evidence and basis for proposed interior design practice legislation, 2) the assessment of the impact of the proposed legislation on the existing regulation and Board activities, and 3) the formation of a recommendation to the Board of Examiners regarding its official position on the proposed regulation to the state legislature.

I was pleased to have the opportunity to work through what I knew to be true with my new committee colleagues, knowing full well that nearly all of them were in general opposition to interior design regulation. I was confident that the opportunity to closely examine the facts of our case and the foundation of our regulatory concerns would generate the substantive discussions necessary to advance recognition of the interior
design profession in our state. I was confident because I was a co-author of the proposed legislative language. I had been working with a dedicated and knowledgeable group of interior designers who understood the subtleties of the interior design practice and of the interior design profession. We’d crafted legislative language that took essential steps to correct the gaps that existed in the protection of the public in the built environment. I was certain that when the Committee took the time to thoroughly examine the evidence and the reasoning behind the proposal, it would substantiate the need for the bill. Was I ever mistaken.

It wasn’t that I was naïve, unprepared for the political posturing, economic resistance, positioning based on institutional canon, tradition, habit, or even issues of gender that would surface, for certainly those incongruities had long been a part of the negotiation among the disciplines. I was ready for those. What I wasn’t ready for was this: I simply found myself arguing a claim with little clear, convincingly organized proof. Or so it seemed. More to the point, the available evidence didn’t take the form of traditional and historical evidence used by architects and engineers in their own path to licensing and other practice regulation. Evidence of the health, safety, and welfare impact of interior design practice – the central tenet of regulatory action – was poorly documented and presented in a piecemeal, largely anecdotal fashion. The evidence was simply not effective in making the case to the necessary audience. They didn’t get it.
That fall I learned two important lessons, each contributing significantly to the structure and content of this work.

Lesson number one: there is a distinct difference between the facts that build understanding and the insight within our intellects and the ability to summarize and communicate that comprehension to others, especially in light of the knowledge itself. It is what Chip Heath refers to as “the curse of knowledge.”¹ Heath uses a 1990 study by Stanford University graduate student in psychology, Elizabeth Newton, to demonstrate the concept. Newton divided her study subjects into two groups: “tappers” and “listeners.” Tappers selected a song from a list of well-known songs and tapped out the rhythm by drumming on a table while the listener guessed the song. Although the listeners correctly identified the song only 2.5 percent of the time – that is, one time in 40, the tappers consistently predicted their success rate would be 50 percent – one time in two. Moreover, the tappers were surprised at how hard it was for the listeners to pick up the tune. Heath writes, “The problem is that once we know something – say, the melody of a song – we find it hard to imagine not knowing it. Our knowledge has ‘cursed’ us. We have difficulty sharing it with others, because we can’t readily re-create their state of mind.”²

Like the tappers in Newton’s experiment, I was flabbergasted. I found my committee members’ inability or unwillingness to understand the expertise and


² Ibid.
contribution of interior designers surprising, frustrating, and very troubling. I knew from my own extensive training, my personal work with the interior design examination development with the Council for Interior Design Qualification (CIDQ)³, and my teaching experience, steeped in the application of the Council for Interior Design Accreditation (CIDA) accreditation standards, that the health, safety, and welfare component was an intrinsic and important part of professional interior design practice. Furthermore, my own unique practice area of forensic design illustrated for me daily the significant and serious impact that improper application of interior content could have on the health and safety of occupants and users of space. Given the extensive knowledge in my head, to suggest less than unqualified agreement by my committee colleagues seemed to me to devalue the contribution of interior design. What I had not done effectively – what the interior design industry had not done effectively – was to connect all the dots for those who did not hold the intrinsic knowledge of the interior designer.

Lesson number two: the notion of the vernacular expands well beyond the use of professional language.⁴ Considerable research has been done on the problems of miscommunication and misunderstanding that arise from interdisciplinary interaction between heterogeneous groups, regardless of the discipline. In particular, various uses

³ Prior to March 2013, known as National Council for Interior Design Qualification (NCIDQ). The corporate name change was implemented to include all member regulatory boards, regardless of country, in representing a global standard of health, safety, and welfare within the interior design/interior architecture profession. Only the Council name is affected; CIDQ continues to develop and administer the NCIDQ Examination and NCIDQ Certificate.

and interpretations of the professional jargon of multiple professions – is a source of conflict.⁵ Given the often-overlapping domains of architecture and interior design practice, the opportunity for misunderstanding on my legislative study committee was profound. Elizabeth Cooley’s research suggests that skills involving the mirroring of the behavior of others, including gestures, expressions, tones, attitudes, choice of words or metaphors, during both listening and speaking, can improve communication and understanding among team members. Inasmuch as I utilized mirroring as a customary personal communication technique, an almost innate part of my complexion as a skilled intermediary, and spent time collectively working through the terminology imbedded in the language of the bill and the substance of our discussions, I neglected to consider an extension of the professional vernacular to include the cultural products of the discipline. The methodology – the very organizing system of my argument – failed to match the manner and form familiar to the architectural and engineering professions. The composition of the case for the interior design profession’s claim as protectors of health, safety, and welfare fostered disbelief.

To be successful, I needed to change both the structure and the language of my case, and narrow its focus to the task at hand: evidence of regulatory need. So began the earliest investigations and the seeds of this work.

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I started by examining the data and the method behind successful regulation of other allied design professionals – architects, engineers, and landscape architects – to date, the most outspoken of challengers to interior design regulation. To make a long story short (the long story and related findings are more or less found in Chapter 2), I found the work of Alex Schatz, J.D. Schatz’s work, *Regulation of Landscape Architecture and the Protection of Public Health, Safety, and Welfare*, was a powerful tool as the landscape architecture profession sought and succeeded in its Nationwide legislative mission. Schatz had learned the lessons I was struggling to decipher and incorporated them into his investigation. The study begins logically and connects all the dots. It does not rely on the listener/reader to have any special knowledge or experience with the discipline or practice of landscape architecture. The study is also couched in the professional vernacular. It focuses on a singular notion: a pattern of the potential harm, which is the only measure of importance when considering public health, safety, and welfare. It utilizes sources of information that are recognizable and reliable to its audience. It presents the material logically, sequentially, and realistically. It presents information factually that was previously treated hypothetically or anecdotaly, allowing the audience to apply its own professional prowess in its assessment. Dare I say it is a male-gendered study? Perhaps. However, such a male-gendered approach is, without a doubt, a necessary part of the contemporary professional vernacular in historically male-dominated design professions.

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I launched into the reconstruction of an argument for interior design regulation. As I started to work, I began to pinpoint why it has been so hard for the interior design profession to make the case for harm, why it has been unable to effectively respond to claims by opponents to interior design regulation that the practice of interior design does not impact public health, safety, and welfare. Despite my frustrations with the often-condescending nature and demagogic tone of the debates, our opposition had a point. In fact, there had been little evidence – at least traditional legal evidence – that unqualified practitioners of interior design have harmed the public. The legal cases they sought didn’t exist. However, there was an important distinction to be made. It was not that the evidence didn’t exist. It was that the form of evidence didn’t exist. Once I realized that the gap in traditional legal evidence was due to the unique nature of interior design itself, I began to identify behaviors of the marketplace in which interior design services are delivered that prevented emergence of the very evidence I sought. And I began to look for alternative sources of data for the practice that served as a clear indicator of the potential harm.

Still focused on the lessons of the committee, I turned my attention to the National Fire Protection Association (NFPA). Not only was it a leading authority on public health and safety with regard to the effects of fire and other hazards, but it was also a repository for detailed fire statistics and investigations dating back to the 1930s, a wealth of detailed and helpful data. In terms of the architectural and engineering vernacular, the NFPA was beyond reproach. Architects and engineers, interior
designers, contractors and building tradespeople, product manufacturers, fire marshals and codes officials – nearly everyone in the construction industry – recognized and respected the organization and its research-based methodologies. Virtually every building, construction, and installation was affected by NFPA codes and standards. In addition, the wealth of NFPA fire-related research was readily available, making access to the information and verification and substantiation straightforward.

The good news was that the data was very detailed and deep; the bad news was that the data was very detailed and deep. Too deep to thoroughly examine and effectively present in a timely fashion for the legislative press in Tennessee. The constituent parts of the formula were within our grasp: effective data sources and authority, effective language, effective form. Unfortunately, the time frame for the work was not nearly so practical to construct the crucial whole. While my initial investigations yielded data that were intriguing and stimulated robust discussion among the committee members, there was simply not enough time to thoroughly explore, absorb, organize, and convey my findings to a wide audience, especially given the intermittent schedule of a volunteer. I knew a less-than-methodical and comprehensive approach would engender the same results as the past.

As charged, the Interior Design Legislation Study Committee reported to the Board of Architectural and Engineering Examiners, tied in its recommendation to the Board. The committee members’ positions remained unchanged from those expressed during our first meeting: half of the Committee enthusiastically recommended pursuit of
the proposed interior design practice legislation, the other half vehemently objected. Ultimately, the Board of Examiners voted to oppose the proposed legislation brought before the state legislature. The proposed legislation was deferred.

But my interest and thus, my data mining expedition, continued. In 2010, still in a volunteer capacity, I published the first survey of my initial findings to a very receptive audience. But I had only presented a cursory look at the data, and only data from a single record period. I hadn’t yet sufficiently connected the dots – and the more I delved, the more dots I found. First, since new data was scheduled to be added to the NFPA record, it was now possible to test my original assumptions against a new data set to perhaps more effectively identify a trend. Second, and perhaps more interestingly, I longed to more fully consider the issues that revolved around the newfound information. How do these revelations impact the current realities of interior design practice? Is the interior design industry – nay the construction industry – in its present form prepared for the mantle of public protection?

The work began to take on a life of its own. It was no longer a part-time, volunteer endeavor, but a mission in its own right. I took a break from practice and in the Fall of 2010 returned to the academy for a closer look. This work is the result of that examination.

Let me be clear: in no way do I expect this work to be a comprehensive accounting of the proof of harm from unregulated practice that the interior design industry has desperately been seeking. Nor do I expect this work to be a definitive product, for it certainly raises more questions than it answers. But I do wish it to be a beginning; a well-reasoned launching point for discussion and further research.

The search that began in desperation has become a promising defense. And a labor of love.
**Table of Contents**

*Abstract* .................................................................................................................. ii  
*Acknowledgements* ................................................................................................. vi  
*Preface* ..................................................................................................................... viii  
*Table of Contents* .................................................................................................... xviii  
*List of Figures* .......................................................................................................... xxi  

**CHAPTER ONE**  
**INTRODUCTION | CONTEXTUAL CONSTRUCTION**  
Value Proposition ........................................................................................................ 1  
Making Space in the Market | Defining the Professional ..................................... 6  
A Matter of Definition ............................................................................................... 8  
Defining a Profession | In the Literature ................................................................. 9  
Defining a Professional Threshold | In the Practice ............................................. 32  
- Architecture  
  - Definition: Architecture ................................................................................. 34  
  - Jurisdictional Claim: Architecture ............................................................... 37  
- Distinguishing Interior Design from Architecture  
  - Definition: Interior Design ............................................................................ 44  
  - Jurisdictional Claim: Interior Design ............................................................... 49  
Place-takings in the Architectural Space ............................................................. 66  

**CHAPTER TWO**  
**STUDY DESIGN | METHODOLOGICAL APPROACH**  
Problem Identification ............................................................................................... 74  
-Seriousness of the Fire Problem ........................................................................ 75  
  - Relationship to the Interior Design Profession ........................................ 78  
  - Impediments to Jurisdictional Claim ............................................................... 87  
  - Cultural and Informational Gap ........................................................................ 89  
Introduction of Study ............................................................................................... 98  
Limitations and Delimitations ................................................................................ 100  
Study Definitions .................................................................................................... 102  
Part 1 | Evidence of Harm | The Implication of Interior Content ........................................... 107  
  - Case Study Identification and Examination .............................................. 107  
  - Analysis of NFPA Annualized Fire Data ..................................................... 110  
Part 2 | (Mis)Alignment of Mitigation | The Current Interior Design Content Delivery System ........................................... 111  
Part 3 | Implications | Interior Design Regulatory and Practice Standards ...................................... 112
CHAPTER THREE  EVIDENCE OF HARM | THE IMPLICATION OF INTERIOR SPACE CONTENT
Case Study Analysis........................................................................................................114
Specific Methodology, Limitations, Delimitations........115
Findings..........................................................................................................................116
Assembly Occupancies: Clubs, Nightclubs,
Stadiums and Amusement Facilities ..........................................................119
Health Care Occupancies: Board and Care Facilities
and Nursing Homes..........................................................................................127
Residential Occupancies: Dormitories,
Lodging/Rooming Houses, Apartments,
Hotels/Motels........................................................................................................132
Non-Residential Occupancies: High-Rises, Banks,
Offices ....................................................................................................................142
Analysis of Annualized Fire Data..............................................................146
Specific Methodology, Limitations, Delimitations........147
Findings........................................................................................................................151
Comparisons to Previous Study ..........................................................163
Summary Conclusion.........................................................................................171

CHAPTER FOUR  (MIS)ALIGNMENT OF MITIGATION | THE CURRENT INTERIOR DESIGN CONTENT DELIVERY SYSTEM
Current Oversight of Interior Design Content Delivery ...........173
   Jurisdictional Limitations of Regulatory Authorities ....174
   Frequency of Incremental Change ..........................................187
The Encompassing Scope of Interior Space Content
Delivery ..............................................................................................................190
Integration of Architectural and Interior Design
Services..................................................................................................................195
Summary Conclusion .........................................................................................197
Current Oversight of Regulatory and Practice Standards ....198
   Legislative Action ..........................................................................................199
   Summary Conclusion ..................................................................................204
   Professional Credentialing and Certification ..............208
   Association Membership and Credentialing ........208
   Summary Conclusion ..................................................................................215
Professional Certification Programs ................................216
   Summary Conclusion ..................................................................................221
Postsecondary Educational Accreditation ..........................222
   Summary Conclusion ..................................................................................226
Practice Implications ..........................................................227
Industry and Regulatory Implications ............................231
Research Implications ..................................................................................231
Fighting Fire with Fire: Redefining the interior design value proposition

Bibliography................................................................. 236
Appendices.................................................................. 280
  Appendix A | List of NFPA Fire Incidents Examined ..... 281
  Appendix B | Determination of Items First Ignited:
                Classification as Interior Space Content.............. 290
  Appendix C | Survey Instrument: Survey About Interior
                Design Services.................................................... 301
  Appendix D | MGM Grand Hotel Fire Litigation:
                Consolidation Action........................................... 332
# List of Figures

## Chapter One

<table>
<thead>
<tr>
<th>Cover</th>
<th>Interior Design Value Proposition Definition</th>
<th>Page 1</th>
</tr>
</thead>
</table>

| Figure 1.1 | Checklist for a Value Proposition | Page 4 |
| Figure 1.2 | Sequential Actions Taken by Emerging Professions | Page 20 |
| Figure 1.3 | 1875 Advertisement in Architects’ and Mechanics’ Journal | Page 28 |
| Figure 1.4 | Topical Search on InformeDesign® | Page 59 |

## Chapter Two

<table>
<thead>
<tr>
<th>Cover</th>
<th>Methodology</th>
<th>Page 74</th>
</tr>
</thead>
</table>

## Chapter Three

<table>
<thead>
<tr>
<th>Cover</th>
<th>Question 1</th>
<th>Page 114</th>
</tr>
</thead>
</table>
Figure 3.1  Case Study Fires Implicating Interior Space Content as a Contributor to Fire Loss  Page 118

Figure 3.2  Annualized Fire Data in Public and High-Risk Occupancies  Page 152-3

Figure 3.3  2002-2005 Avg Annual Fires Involving the First Ignition of Interior Space Content  Page 154

Figure 3.4  2006-2010 Average Annual Fires Involving the First Ignition of Interior Space Content: Hotels/Motels  Page 156

Figure 3.5  2002-2005 Average Annual Fires Involving the First Ignition of Interior Space Content: Nursing Homes  Page 156

Figure 3.6  2003-2006 Average Annual Fires Involving the First Ignition of Interior Space Content: Hospital and Hospice Facilities  Page 157

Figure 3.7  2003-2006 Average Annual Fires Involving the First Ignition of Interior Space Content: Mental Health and Substance Abuse Facilities  Page 157

Figure 3.8  2006-2010 Average Annual Fires Involving the First Ignition of Interior Space Content: Residential Board and Care Facilities  Page 158

Figure 3.9  2007-2011 Average Annual Fires Involving the First Ignition of Interior Space Content: Multi-Family Properties  Page 158

Figure 3.10  2004-2008 Extent of Damage: Loss Beyond the Floor Of Origin: Public Assembly Occupancies  Page 160

Figure 3.11  2007-2011 Extent of Damage: Loss Beyond the Floor Of Origin: Multi-Family Properties  Page 160
Figure 3.12  2006-2010 Extent of Damage: Loss Beyond the Floor Of Origin: Hotels/Motels  Page 161

Figure 3.13  2002-2005 Extent of Damage: Loss Beyond the Floor Of Origin: Nursing Homes  Page 161

Figure 3.14  2003-2006 Extent of Damage: Loss Beyond the Floor Of Origin: Mental Health and Substance Abuse Facilities  Page 162

Figure 3.15  1999-2002 Annualized Fire Data in Public and High-Risk Occupancies  Page 163

Chapter Four

Cover Questions 2 and 3  Page 173


Figure 4.1  Spectrum of Interior Content Delivery  Page 192
Introduction | Contextual Construction

Value Proposition

Former McKensey & Company consultant Michael Lanning first coined the term “Value Proposition” in a 1988 white paper he co-authored with colleague Edward Michaels.¹ In this 1988 work, Lanning and Michaels expand upon an economic framework that allows industries to leverage the substantial, intangible, subjective value of their products and services and to apply the resulting knowledge to all aspects of production and distribution.² For Lanning and Michaels, the key to a successful systemic strategy is the development of a well-defined and demonstrable value proposition, “…a


² Ibid., 45. Article adapted from McKensey staff paper, “Market strategy and the price-value model,” authored by Harvey Golub and Jane Henry in August 1981.
clear, simple statement of the benefits, both tangible and intangible, that the company
will provide, along with the approximate price it will charge each customer segment for
such benefits.” In a later work, Lanning further defined a value proposition, sometimes
also referred to as a value imperative, as the sum total of a unique value – and the
relevance of that value – offered to a customer by an organization in return for the
customer not choosing a competitive alternative.

The genesis of value proposition is firmly embedded in the discipline of business
and market strategy, seemingly worlds apart from the creative and technical world of
interior design and the built environment. Yet, such a perspective can be extremely
valuable, perhaps now, more than ever, as the interior design profession continues its
struggle to define itself in a realm of competing professions, a realm filled with areas of
overlapping knowledge, ideas, theories, and skills. The emergence of interior design as
a unique and specialized profession raises serious questions about the parceling of
expert knowledge and skill within the existing professional domains of architecture and
interior decoration. While sociological theory can provide insights into what drives and
shapes the emergence of new professions, it is marketing theory and practice that
provides a vehicle for its effective realization and expression. It is here, in the
understanding and recognition of the importance of interior design, and in the

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3 Ibid., 53.
4 Michael J. Lanning, Delivering Profitable Value: A Revolutionary Framework to Accelerate
demonstration and articulation of that importance to the public, that tangible differentiation becomes operational.

In a recent essay on the state of the interior design profession, design industry leader Suzan Globus wrote, “Defining the value of interior design is like trying to answer the question about how many angels fit on the head of a pin. It is a vast and somewhat mysterious subject. The value of interior design is largely undocumented, unsubstantiated, and yet, undeniable.”\(^5\) While one could argue that there are, in fact, well-documented, evidence-based research investigations that address and substantiate the value of interior design, especially with respect to the health, safety, and welfare of building occupants, it is clear that the work remains largely outside the public discourse, even outside the discourse within the related professions. Perhaps, as this study suggests, the dialogue is limited in large part because the interior design profession has yet to clearly articulate its impact in terms that are meaningful to its intended audiences. In the business realm, the key to success in a competitive market is definition and differentiation.

Lanning’s and Michaels’ work suggests that such differentiation, articulated in concrete, observable, demonstrable terms, terms that consider the domain, marketplace behavior and service delivery systems, is the stuff of successful value propositions. The two also suggest that each market segment will require its own value proposition. In their exploration of the systemization of the value proposition, Lanning and Michaels

devise a methodology to test the viability and clarity of a given proposition. The resulting checklist of questions becomes an effective tool for evaluation, a focused lens, through which one may examine the value of a product or service (see Figure 1.1). It is a goal of this study to provide such an evaluation of the impact of interior design on public health, safety, and welfare as a component of the interior design proposition. Lanning and Michael’s notion of the value proposition, along with their checklist methodology, will serve to broadly guide the inquiry within this study. Among other questions, the checklist asks:

- *Are the benefits explicit, specific, and clearly stated, and is the price explicitly stated?* Chapter three seeks to explore the value of interior design in direct relation to the risk – or cost -- of harm to the public.

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6 Golub, “Delivering Value to Customers,” 54

7 Ibid.
• *Is the value proposition supported by evidence of adequate demand – and of acceptable returns? Further, is the value proposition viable in light of competitors’ value propositions?*\(^8\) Chapter four seeks to examine the current market delivery system for interior design content with respect to the regulatory requirements and protections offered by other key players in the construction industry, namely architects and engineers.

• *Is the value proposition achievable? Are the required changes to the current business system feasible?*\(^9\) Chapter four also seeks to consider the implications for the service delivery of interior design content in light of the study findings. This chapter seeks to respond to two additional questions included in the checklist: *Is it clear that the value proposition is superior for the target segment (or segments)? and is this the best of several value propositions considered?*\(^10\)

By better understanding the boundaries and overlaps between and among interior design, architecture, and interior decoration – and their relative definitions – it is then possible to delineate a strategy to assess and ascribe value.

This investigation is far from a marketing study or, for that matter, a marketing proposition. However, in light of the seeming difficulties in the identification and articulation of the value of interior design within the broad narrative of the discipline’s

\(^8\) Ibid.

\(^9\) Ibid.

\(^10\) Ibid.
professional development, the framework of the value proposition seems an apposite place to begin the conversation. Lanning’s notion of delivering profitable value in the context of business enterprises focuses on systematizing value delivery – identifying and delivering value as a means to manage complex relationships both within and without an organization. He writes that such delivery systems “must be understood and managed in the context of their market spaces – the other business with which the firm’s primary value delivery systems may interact.”

Putting to work Lanning’s thesis in assigning and delivering value through interior design then, it is important to pose a number of questions. Is it possible to define a unique value of interior design in relation to the value proposition of competing disciplines? Is it possible to classify the costs associated with the unique value of interior design, or perhaps more appropriately, the costs of not providing such services? And lastly, is the existing system of business delivery – the way in which interior design services are procured in the marketplace – capable of sustaining a distinctly defined interior design value proposition?

**Making Space in the Market | Defining the Professional**

In order to articulate an effective value proposition for the health, safety, and welfare impact of interior design practice, we must first understand the framework of the larger field of practice, what, as noted above, Lanning refers to as “Market Spaces.”

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11 Lanning, *Delivering Profitable Value: A Revolutionary Framework to Accelerate Growth, Generate Wealth, and Rediscover the Heart of Business*, xvi.
More specifically, we must consider the path the interior design profession has taken and the model and/or models on which such paradigms are based.

To date, the preponderance of sociological theory that seeks to explore the development of professions focuses on the organizational patterns of emergence – or rather advancement – from former occupations. According to these sociological theorists, the process of attaining professional status, despite the reasons that precipitate its evolution, involves an intentional labeling (or re-labeling) of its contributions “…in order to lose their past, assert their monopoly, and, most importantly, to give themselves a label capable of legislative restriction.” So it goes with the interior design profession, though it is some matter of debate among practitioners as to whether its origin lies within architecture, interior decoration and the decorative arts, or perhaps both. Nevertheless, recent manifestations in the interior design industry’s quest for professional status, especially within the legislative and regulatory arenas, are seemingly centered on the competitive positioning and the partitioning of province among architects and interior designers. Thus, we shall focus in this study on the interior design profession’s attempt to define itself within the larger, more established architectural sphere. Although not the primary focus of this work, we must acknowledge that within the interior design field itself, similar debate revolves around an even further

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13 Ibid., 11. Here, Abbott summarizes the work of Harold Wilensky and Theodore Caplow.
division of labor and responsibility with regard to interior decoration and other decorative arts.

**A Matter of Definition**

Within the North American design professions there is a great debate, a debate that continues from its likely inception in the middle of the nineteenth century. Is interior design a unique profession? In a recent essay on contemporary issues in the interior design profession, Scott M. Ageloff suggests that the current answer is, “Not yet anyway.”\(^\text{14}\) On the face of it, Ageloff’s comment appears to imply that the practice of interior design has not attained professional recognition. And yet, within this simple three-word response, Ageloff alludes to a more complicated dynamic: the existence of a developmental path to professional maturity. Similarly, in “Evolution of the Profession,” Cindy Coleman writes, “Interior designers can trace their profession to many who preceded them, from the cave painters at Lascaux to the creators of the frescoed interiors at Pompeii to the holistic architecture, interiors, and furnishings of Robert Adam and Thomas Jefferson in the eighteenth century, and Frank Lloyd Wright in the twentieth.”\(^\text{15}\) Like Ageloff, Coleman suggests a path of professional emergence. To better understand the debate, it is important to understand the overarching nature of the professional space. If, as Coleman and others suggest, interior design evolved from

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other design-related occupations and/or professions, there is an implication of a subdivision of an existing domain, or domains, a categorical parceling of specialized knowledge and skill. What drives and shapes the emergence of new professions? What is the impact on the generative professions? And, perhaps more importantly, what role do new professions play in their fields and within the larger society? Critical questions all.

**Defining a Profession | In the Literature**

Initially referring to the three “learned professions” of law, the Church, and medicine as early as the middle of the fifteenth century, the Oxford English Dictionary defines a profession as, “An occupation in which a professed knowledge of some subject, field, or science is applied; a vocation or career, especially one that involves prolonged training and a formal qualification. Also occasion[ally] as a mass noun: occupations of this kind.”

According to the dictionary’s etymological outline of the expression, it is not until the early 1830s, squarely rooted in the midst of the industrial revolution, that the term is applied to new professions, expanding beyond the original initial three. Accompanying definitions indicate a more widely used expression describing “any occupation by which a person regularly earns a living.” Under this listing, the etymology clearly outlines a usage that is interchangeable with an occupational status, commonly associated with trades and/or handicrafts, citing, for

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16 Oxford English Dictionary Online, s.v. “profession”

17 Ibid.

Similarly, the Oxford English Dictionary defines the term occupation as, “[a] particular action or course of action in which a person is engaged, esp. habitually; a particular job or profession; a particular pursuit or activity,” including a specific application to “mechanical or mercantile employment; trade; (also) a skilled handicraft.”  

Given that the etymological record for both terms are similar in time frame and aspect, it appears that in general usage the terms are synonymous at best. As a means to characterize a specific title, the term profession on its own offers little value. Certainly the nebulous nature of the associated phrases such as “professed knowledge of some subject [or] field”, or “prolonged training and a formal qualification” provides no clarification.

Many scholars offer insight into the definition of “profession” and to the process of professionalization. Andrew Abbott describes the development of the literature from its earliest inception in the early 1930s to the present as a gradual shift from naturalism, evidenced in case studies and typologies, to the theory, demonstrated by interpretations that emerged when examining the process of professionalization.  

Abbott summarizes the primary theoretical interpretations from sociologists, political scientists, and others studying specific professions from within their ranks. “For some, professionalism was a means to control a difficult social relation; for others, a species of corporate extortion.

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18 Ibid.

19 Oxford English Dictionary Online, s.v. “occupation.”

For still others its importance lay in building individual achievement channels, while a fourth group emphasized how it helped or hindered general social functions like health and justice."21 The naturalism to which Abbott refers began with a systematic examination of the typology of existing professions in England by Sir Alexander Morris Carr-Saunders and Paul Alexander Wilson (1933), in which they outlined in historical detail the elaborate systems of organization and preconditions for entry into a given profession. According to Abbott, this work yields one of the first definitions of professions as "...organized bodies of experts who applied esoteric knowledge to particular cases. They had elaborate systems of instruction and training, together with entry by examination and other formal prerequisites."22 The resulting list of common characteristics of professions generated by the observations of Carr-Saunders and Wilson became the core of later definitions of profession. In 1964, Harold Wilensky extrapolated the existence of a regular sequence in the professionalization of American occupations, assisting in formalizing the functionalist concept of professionalization. Scholars such as Talcott Parsons (1939) and Everett Hughes (1958) would offer insights as to the self-interest of professions and the use of professionalism as a mechanism of protectionism. As Abbott suggests, there is a gradual shift to theorization and idealization in the literature, and by the 1960s and 1970s, notions of professionalization as a means to hegemony, power, control, and economic monopoly

21 Ibid.
22 Ibid., 4.
become central to the understanding of the term *profession.*

Still others considered the function of professionalism in protecting individuals – the professionals themselves – from circumstance by providing a means for status and achievement based on merit rather than by class.

Despite the theoretical variations of the scholars summarized above, Abbott arrives at a generally accepted definition of *profession.* “Certainly all agreed that a profession was an occupational group with some special skill. Usually this was an abstract skill, one that required extensive training. It was not applied in a purely routine fashion, but required revised application case by case. In addition, professions were more or less exclusive.”

Eliot Freidson presents a similar, broad definition of profession as he, like Abbott, summarizes and comments on the theoretical theses of the scholars that preceded his own work. “…Professions are the agents which create and advance the knowledge embodied in disciplines, and their members project that

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23 Terrence Johnson, in *Professions and Power (Study in Sociology)* (1972), theorized that rather than serving broad and intangible societal needs, the professions imposed both needs and manner of service on consumers. Eliot Freidson, in his work *Doctoring Together: A Study of Professional Social Control* (1975) suggests that within American medicine, autonomy of practice and authority, not collegiality and trust, are the characteristics of professionalism. Also from the medical community, Jeffrey L Berlant, in his work *Profession and Monopoly* (1975), theorizes that the very construction of professionalism is a means to economic monopoly. Interestingly, Berlant considers the ethics codes, considered altruistic in earlier works, to be an important device of professional monopolization. Magali Larson’s *The Rise of Professionalism* (1977) identified professions were market organizations exerting control over areas of social concern.


knowledge into human and state affairs.”26 Like Abbott, Freidson further expands his
definition to include a reference to the aspect of control asserted by the professions. “I
use the word ‘profession’ to refer to an occupation that controls its own work, organized
by a special set of institutions sustained in part by a particular ideology of expertise and
service. I use the word ‘professionalism’ to refer to that ideology and special set of
institutions.”27 Freidson expounds by offering two differing, and what he describes as
sometimes confused, applications of the concept of professionalism. The first, rooted in
naturalism, describes the notion of stratification by specialized skill. The second, more
closely aligned with theoretical interpretation, describes the more complex, institutional
nature of the concept of professionalism:

First, there is the concept of profession that refers to a broad stratum
of relatively prestigious but quite varied occupations whose members
have all had some kind of higher education and who are identified
more by their educational status than by their specific occupational
skills. Second, there is the concept of profession as a limited number
of occupations which have a particular institutional and ideological
traits more or less in common. It is only this second concept which
allows us to think of ‘professionalism’ as… a way of organizing an
occupation….It represents much more than only a status, for it
produces distinctive occupational identities and exclusionary shelters…
which set each occupation apart from (and in opposition to) the
others.28

26 Eliot Freidson, Professionalism Reborn: Theory, Prophecy, and Policy (Cambridge, UK:
27 Ibid., 10.
28 Ibid., 16-17.
For Abbott and Freidson, more important than the construction of a structural definition is an understanding of how such structures are used by a profession, the ways in which a profession uses its specialized knowledge and skill to shape the conceptions of themselves and others. Freidson theorizes that an understanding of particular bodies of knowledge and skills claimed by professions, the institutions that convey information to the public, and the public themselves are “…essential for understanding the demand for different professional services and the value assigned to them, the support the public may provide to efforts by the state or capital to enlarge, restrict, or control professional enterprises, and the prestige and authority of professions themselves.”

It is the study of this institutionalization of professional expertise, as Abbott observes, “how modern societies institutionalize expertise,” that provokes a multidimensional examination of professionalization in terms of the process of becoming a profession. Abbott’s approach builds upon those of his predecessors by suggesting that the focus on professional structure, while helpful, is insufficient because it concentrates more on the forms than on the content of professional life and misses the larger context in which that activity occurs. Instead, Abbott focuses on the connection between a profession and its professional tasks, what he refers to as jurisdiction, in order to explore the larger context. The profession is “operationalized” through the

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29 Ibid., 43.
31 Ibid., 1-2.
32 Ibid., 33.
imposition (and maintenance) of professional jurisdictions, and the profession’s interaction with public audience.

In particular, the ways a profession lays jurisdictional claims to a specific practice and the role of these claims in society is key to not only becoming a profession in structural terms, but also to its ability maintain its jurisdiction over time. These claims serve to formally control work (particularly within the legal system), to mediate public opinion and sentiment, and, ultimately to affect the workplace. According to Abbott:

A jurisdictional claim made before the public is generally a claim for the legitimate control of a particular kind of work. This control means first and foremost a right to perform the work as professionals see fit….a profession normally also claims rights to exclude other workers as deemed necessary, to dominate public definitions of the tasks concerned, and indeed to impose professional definitions of the tasks on competing professions. Public jurisdiction, in short, is a claim of both social and cultural authority.\(^{33}\)

One of the most significant ways that professions exert and maintain jurisdictional authority, especially among competing professions, is through the use of the profession’s specialized, abstract knowledge.\(^{34}\) Certainly a profession is identified by society and by the public as having expertise that is based on the application of specialized knowledge and skill, a byproduct of education. As Abbott describes, the first fundamental postulate of the professional model is “(1) that the essence of a profession

\(^{33}\) Ibid., 60.

\(^{34}\) Ibid.
is its work not its organization."³⁵ Professional activities – the real work of a profession – are organized around the knowledge of a profession. Freidson reinforces this notion in his text *Professionalism Reborn* by stating, “Knowledge itself does not give special power: only exclusive knowledge gives power to its possessors. And it is precisely in the occupational principle of organization, by which recruitment, training, and the performance of the work of creating, disseminating, and applying knowledge are controlled by the ‘knowledge occupations’ and that such power is obtained.”³⁶ Abstract knowledge legitimizes professional work.³⁷ Abbott observes, “Many occupations fight for turf, but only professions expand their cognitive dominion by using abstract knowledge to annex new areas to define them as their own proper work.”³⁸ The maintenance of professional standing over time – perhaps its very survival – relies on the ability of a profession to define, ascribe value to, and build on its unique and specialized knowledge. As specialized knowledge develops and evolves, it is applied and tested in practice, discussed, and finally disseminated as a component in a larger body of professional knowledge. Members can then participate in the future development and expansion of the abstract knowledge of the profession, perhaps redefining the profession’s jurisdictional boundaries.³⁹

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³⁵ Ibid., 112.
³⁸ Ibid., 102.
Layered onto the desire and/or need for specialized knowledge necessary for the solution to complex problems is the criticality, real or perceived, of the work of a profession to social and societal welfare. “Professionalism is reserved for occupations where an absence of special regulation is perceived to ‘significantly harm or endanger public health, safety, or welfare’ …”40 While professionalism is clearly not the only mechanism by which the public health, safety, and welfare are protected, legislative action provides the legal authority for a profession to recruit, train, examine, license, and regulate the member performance within its jurisdiction.41 Torres speaks plainly, “…the formal border between professional and nonprofessional occupations is quite clear – state legislative acts granting occupations professional status.”42

Abbott’s model attempts an examination of professions within the system in which they exist, a system that endeavors to recognize broad social forces acting on the professions, interrelationships among and between professions, as well as internal forces within the professions themselves. To attempt to shed additional light on the forces at work, and building on the largely structuralist work of Wilensky and Caplow,
Abbott examines the components involved the sequential set of internal actions that are taken by emerging professions along their paths to professionalization or in an attempt to maintain and/or defend their professional position. Abbott paraphrases the sequence:

Professions begin with the establishment of professional associations that have explicit membership rules to exclude the unqualified. Second, they change their names, in order to lose their past, to assert their monopoly, and, most importantly, to give themselves a label capable of legislative restriction. Third, they set up a code of ethics to assert their social utility, to further regulate the incompetent, and to reduce internal competition. Fourth, they agitate politically to obtain legal recognition, aiming at first to limit the professional title and later to criminalize unlicensed work in their jurisdiction.

Caren Martin’s 1998 study of design professions – architecture, interior design, and interior decoration – identified two additional internal actions inherent in Abbott’s first sequential identification, quoted above: the establishment of professional associations with rules of membership meant to exclude the unqualified. Martin demonstrated that, “in all examples of professionalization offered by Abbott, whether medicine, law, or engineering, the terms of membership were established through [1] formalized education followed by [2] juried examination as a form of confirmation of

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abstract knowledge. It is important to note that both preparatory education and continuing education are required for maintaining membership.\textsuperscript{46} In her 2007 work, Martin added continuing education as a seventh, and formal component to Abbott’s earlier model of professionalization (see figure 1.2).\textsuperscript{47} Martin wrote:

These actions typically occur in the sequence shown, and all must be present to a degree for a practice to become a profession.

1). Professional organization membership allows networking with others engaged in the same work, creates a sense of community and offers a means to include and/or exclude individuals based on their abilities to perform professional tasks.

2). Name change allows members to create a distance from a past that may not be as distinguished or sophisticated as the practice has become.

3). Code of ethics indicates to both the practitioners and the public that the practice has standards that must be met and the practice will police itself to maintain quality and respect.

4). Educational requirements ensure a knowledge base as a preparatory step for entering the profession or for maintaining membership through continuing education (see below).

5). Comprehensive examination through a juried process tests abstract knowledge and reinforces the professionalism of the profession by protecting the public through ensuring that a minimum level of competency is met to practice as a professional.

6). Legal recognition/regulation secure official and public acknowledgement of the practice and its right to engage in jurisdictional work to the exclusion of all others and clearly identifies for the public professionals who are qualified to protect their health, safety, and welfare.


\textsuperscript{47} Ibid.
7). Continuing education ensures that the practitioners advance their knowledge base to remain competent professionals.\textsuperscript{48}

**Figure 1.2: Sequential Actions Taken by Emerging Professions**
Abbott’s original model of professionalization is modified to include preparatory education, comprehensive examination, and continuing education in the internal actions taken by occupations on a path to professionalization.

These components of Abbott’s model, their definitions and descriptors, are borne out by more recent literature. Allen Dyer found that “an ethic of service,” in addition to scientific knowledge and technical expertise, is necessary to distinguish medicine as a profession rather than a trade.\textsuperscript{49} In an examination of Scottish chartered accountants, Stephen Walker outlines four “organizational and membership traits as evidence of the


performance of their fundamental function in society….an intellectual basis to practice acquired by specialist training and education…; a code of ethical behavior; professional autonomy; and altruism as opposed to self-interest.”

Charles Oppenheim and Natalie Pollecutt summarize the findings in librarianship literature and found that, “professions at minimum involve: a specialized skill or knowledge gained through extensive education; the development of this body of knowledge through research; a valuable service that benefits society; and autonomy.”

In the field of business management, Rakesh Khurana, Nitin Nohria, and Daniel Penrice identified the following traits and practices as:

…the essence of professionalism and to enable us to compare management with what we take to be bona fide professions, in particular law and medicine….

- a common body of knowledge resting on a well-developed, widely accepted theoretical base;
- a system for certifying that individuals possess such knowledge before being licensed or otherwise allowed to practice;
- a commitment to use specialized knowledge for the public good, and a renunciation of the goal of profit maximization, in return for professional autonomy and monopoly power;

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Fighting Fire with Fire:
Redefining the interior design value proposition

- a code of ethics, with provisions for monitoring individual compliance with the code and a system of sanctions for enforcing it.\(^\text{52}\)

Jane B. Singer analyzed conventional and online journalists by evaluating the professions using three widely accepted benchmarks of professionalism. These dimensions include, “A cognitive dimension centers on the body of knowledge and techniques that professionals apply in their work, as well as the training needed to master these concepts and skills. A normative dimension covers the service orientation of professionals and their distinctive ethics, which justify the privilege of self-regulation that society grants them. An evaluative dimension ‘implicitly compares professions to other occupations, underscoring the professions’ singular characteristics of autonomy and prestige’ …”\(^\text{53}\)

What is evident from a review of the literature is there is great complexity in defining the term “profession.” Characteristics internal to the occupations themselves along with external forces such as political, economic, and social conditions, serve to shape the final outcome. “To define ‘profession’ is to invite controversy.”\(^\text{54}\) In “The Problem of Defining a Profession,” Cogan is very direct. Definition is in the eye of the


beholder and, when used to delineate one group over another for reasons of power or exclusion rather than for functional purposes, the waters get very murky. “So many advantages have accrued to profession, so many claims to it are made by so many people, that the cutting edge of a definition – be it ever so blunt – is almost sure to draw cries of protest from many aspirants to the title.”

While Abbott’s and others focus on the connection between a profession and its professional tasks is useful in broadening the context of understanding of the nature of profession, this approach still reduces the investigation to the products of the profession, effectively divorcing practitioners from their social milieu and the systems within which they are embedded. Thus, a more relational approach, specifically outlined in the work of Pierre Bourdieu as presented in *The Field of Cultural Production*, is a more useful lens to attain a broader understanding of the whole of the professional field and explore the connections between production, consumption, and reproduction within the realm of practices.

Bourdieu’s relational thinking places sociology on a scientific plane along with mathematics and physics. In the same way that identification of Cartesian points can place an individual in a space and link that individual to other elements in their

55 Ibid.
surroundings, so Bourdieu seeks to model the social environment in a given time and place.

The starting point for Bourdieu’s structuralist model is the assumption that societal structure is formed by the continuous competition between social agents acting to further their own interests, to improve or defend their position in the society. Such struggles occur at every level, between individuals, families, classes, and among a host of aggregate bodies such as networks, offices, organizations, associations, etc., each assemblage acting as a collective. For example, in the realm of architecture and interior design, struggles ensue among, to name a few, individual practitioners and those organized into design firms, between professional organizations formed to promote the practice such as the American Institute of Architects (AIA) and the International Interior Design Association (IIDA) and agencies formed to protect the public such as the National Council of Architectural Registration Boards (NCARB) and its interior design twin, the Council for Interior Design Qualification (CIDQ), among organizations and agencies that serve to generate codes and regulations, and those regulatory authorities that are responsible for their enforcement. Similarly, there are struggles that occur between a host of media organizations such as design publications and presses that are aimed at distribution among field professionals (*Architecture, Architectural Record, Perspective, Interiors & Sources, Contract*) and those targeted toward the general public (*Architectural Digest, Dwell, Design, Home Décor, HG TV*) and among critics, authors, book publishers, galleries, regions of the country, as well as the among the various academies that seek to train young designers.
In Bourdieu’s terms, each participant’s position, or “space-taking,” then, is defined in relation to the whole, the “space of possibilities,” and it receives its distinctive “value” from its negative relationship with the coexistent positions. In effect, every position is delimited by the position(s) of others. Success in obtaining (and maintaining) optimal positions in relation to others is dependent on the amount of “capital,” or resources, one controls. Like the value that accrues from the negative relationship among position-takings, so too, is capital linked to a negative relationship. In order for one to control (and keep control of) capital, one must deny resources to one’s competitors, including through the use of bad faith. Power, then, is inextricably linked to the control of resources. “The control of resources both requires and gives power, and it is with power that Bourdieu is primarily concerned – how it is exercised, who wields it, and for whose benefit.”\(^{58}\) Bourdieu’s notions are in keeping with Marxist theory: that based on the amount of economic capital they control, individuals and groups can be forced into a social hierarchy through the application of economic power. However, Bourdieu proposes an additional, more prevalent form of power to Marx’s notion of economic power, that of “symbolic power.” Bourdieu terms it symbolic because it is not recognized as a traditional form of power such as physical or economic power. Rather it is, “the wielding of symbols and concepts, ideas and beliefs, to achieve ends.”\(^{59}\) For Bourdieu, it is the application of symbolic power that operates and produces “culture.” Symbolic power is very effective – in economic terms, efficient – because it convinces


\(^{59}\) Ibid.
those who have the least to benefit from the hierarchy to participate in their own subjugation. This is especially important when the control is, in Bourdieu's terms, “misrecognized” as perfectly legitimate, even natural.

For example, in the mid nineteenth century, architects found themselves competing with building trades and artisan craftpersons for work; products by these tradespersons were attractive to the consumer since the projects were typically accomplished at a lower price than projects designed by architects. Especially in situations where boundaries between professions are not firmly delineated, professional groups must negotiate for position, either as dominant, subordinate, or co-equals in the division of labor.\(^{60}\) Success in positioning comes down to the ability of each respective group to demonstrate its social, cultural, and even perhaps legal legitimacy. In this case, the architectural associations, possessed of greater capital than the building trades, secured advertisements in the popular media to wield its power and sway public sentiment in their favor. An 1875 advertisement in *Architects’ and Mechanics’ Journal* by George Tilden and William Preston, entitled “Ecce Architectus! [Behold the Architect!]” reads, “Away with the demoralizing of Learning!! None but the blind, insane, or partially idiotic allowed to practice.”\(^{61}\) The cartoon images portray a poorly clothed, drooling, idiotic worker displaying a simplistic drawing of a building, which in the background is displayed as appallingly constructed, in a state of eminent collapse (see

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Figure 1.3). Also in the background, one can see a line of distinguished, well dressed architects in top hats and coats, portfolios in hand, standing in a long line to enter the “Asylum for Educated Architects.” Not only did this ad take advantage of the architects’ claim to unique knowledge of structural and building systems for the protection of the public, but also plays on public fears regarding the largely-immigrant composition of the building trades to exert its superiority over artisans and builders. If the ads are successful, the general public, then, is complicit in the unfair hierarchization, despite the fact that many might benefit financially or otherwise from having a home built outside the expertise of an architect by a competent tradesperson. The architects gain materially and symbolically by the subjugation of the artisans and craftspersons and, in the process reify their own social and cultural legitimacy through their exertion of superiority and manipulation of belief. For Bourdieu, “cultural producers,” then, are those “who occupy the economically dominated and symbolically dominant position within the field of cultural production…” In other words, they draw on all their resources to justify their domination both to themselves and to others. Although Bourdieu’s two-dimensional charting system is limited in its ability to illustrate detailed connections between fields, positions-takings at a given moment in time can be largely mapped onto a diagrammatic set of fields representing the field of culture as well as the fields of power and class, each situated with respect to its position within the dominant or subordinate fraction, the cultural capital they possess, and their relative autonomy or

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62 Ibid., 153.

63 Pierre Bourdieu, The Field of Cultural Production, 44.
ability to operate according to principles derived from the field itself rather than conformance to other societal pressures. Just as struggles define each position in, among, and between the various fields, so the field of culture is defined by the struggle between those who produce symbolic goods for mass consumption by all classes, the field of mass production, whose goal is primarily economic and those who produce for the small scale, dominant culture, the field of restricted production, whose success is more typically measured in intellectual and aesthetic capital. This is not to say that economic profits are unachievable for successful small-scale producers. In fact, Bourdieu’s theory outlines the temporal mechanism whereby the field of restricted production’s high degree of autonomy leads to production of ‘art for art’s sake’ or ‘production for producers’ rather than having to meet the involuntary demands of an external market. Initially their short-term economic profits are likely limited. However, the short-term opportunity for symbolic capital is amplified and the intellectual and aesthetic

Figure 1.3: 1875 Advertisement in Architects’ and Mechanics’ Journal
When faced with ambiguity between competing professions, the architectural profession used the media to convince the public of its social, cultural, and perhaps legal legitimacy.

By: George Tilden and William Preston, “Ecce Architectus!” Architectural Sketchbook, March 1875; Source: The Avery Fine Arts and Architectural Library, Columbia University in From Craft to Profession, by Mary N. Woods.
value to society is often parlayed into long-term economic success as the symbols they produce are adopted by those in the dominant positions as a means to sustain their place in the social order. For example, in the field of architecture, architects have developed bureaucratic mechanisms such as licensing qualifications including education, experience, and examination that restrict who is (and who is not) a member of the group. Excluded members, such as developers, builders, architectural technicians (drafters, designers, etc.), engineers, even owners themselves — non “architects” — produce the lion’s share of projects for the masses including housing, offices, shopping centers, retail facilities, etc. “Architecture” production then is reserved for unique projects designed by those in the field of restricted production, acting, often unknowingly, in the service of the dominant class. A clear example is provided by Garry Stevens, as presented in Eaton’s work, *Two Chicago Architects and Their Clients*:

> Frank Lloyd Wright could best pursue his dream of a wholly American, organic architecture by designing houses for exactly the same sort of conservative, upper-class, Republican businessmen who were erstwhile clients of those whom he most hated, those who espoused a Beaux-Arts eclecticism; and all the while he was convinced that he was engaged in the service of Architecture, not realizing that by serving his own interests best he also best served the interests of the ‘best.’

In fractal fashion, within the field of restricted production, there is yet another polarization between those established members of the field who dominate the field, (Bourdieu refers to these as avant-garde producers), and subordinate newcomers to the field that challenge the status quo in their attempt to reposition themselves at the top.

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The resulting struggles between the poles provide an effective dynamic that constantly affects and changes the discourse of the field. “So-called classic works” are constantly re-evaluated and change as the universe of coexistent works changes.\(^65\) This is especially apparent in the use of parody and satire to relate to existing and sanctified works while at the same time to define significant breaks from the orthodoxy of the past. “In this case, the newcomers ‘get beyond’ [‘dépassent’] the dominant mode of thought and expression not by explicitly denouncing it but by repeating and reproducing it in a sociologically non-congruent context, which has the effect of rendering it incongruous or even absurd, simply by making it perceptible as the arbitrary convention it is.”\(^66\) For example, in 1966, relative newcomer Robert Venturi published a self-ascribed “gentle manifesto,” Complexity and Contradiction in Architecture, that provided an effective, potentially parodic forum to revisit historical architectural context in response to the ahistorical Zeitgeist of the modernist movement. Venturi’s initial work yielded substantial symbolic capital; he was identified quickly as a theorist and designer with radical ideas. Such resources provided him with opportunities to teach at Yale, a well-respected and dominant program as well as new opportunities for project commissions, building economic capital and, over time, securing his position among the dominant producers with the prestige, status, and authority in both real and symbolic hierarchies that comes with it. By 1977, he was able to publish Learning from Las Vegas: The Forgotten

\(^65\) Bourdieu, The Field of Cultural Production, 31.

\(^66\) Ibid., 31.
Symbolism of Architectural Form, a second manifesto more direct in its criticism of orthodox modernism that had none of the “gentleness” required of a newcomer.

The examples of Wright and Venturi illustrate a system of extremely complex relations that are the product of unconscious, autonomic, almost instinctual social strategies that are part of the attitudes and perspectives inculcated through the socialization or enculturation process (Bourdieu titles this mechanism *habitus*) as well as strategies that are consciously produced in response to a specific situation, such as the 1875 Tilden and Preston advertisement disparaging the work of the building trades and artisan craftspersons. Although, since these situations are in and of themselves produced in accordance with the schemes of habitus, Bourdieu submits that these reactions can be semi-conscious at best. In the example of newcomer architect Venturi above, what appear to be personal decisions about his own work are, in fact, based in relation to position-taking within the field. Those with whom Venturi associates in the architectural dialogue, the publisher that is selected to publish his work, the media sources that disseminate his work, the school with whom he will associate and whom will be credited with the production of his further works, are all selected because they align with Venturi’s own opinions about himself and his work. As much as he believes that he is acting subjectively – consciously – with regard to his particular situation, in fact, he is responding to and within the structure of his own habitus. To extend its thinking, the cultural field creates, legitimates, and reproduces the class structure. It

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67 Bourdieu, *The Field of Cultural Production*, 133.
seeks to legitimize the very system of inequality that keeps certain groups in control of the field of discourse.

Defining a Professional Threshold | In the Practice

The discussion of professionalization in this work is intended to provide contextual evidence with respect to the central question of whether or not interior design is a unique profession distinct from architecture and interior decoration, and is summary in nature. Martin’s extensive application of Abbott’s 1988 model of professionalization to the chronological-historical analysis of architecture, interior decoration, and interior design practices provides significant insight into this question. Martin found that both the practices of architecture and interior design have undertaken all of the actions that characterize professionalization according to Abbott (1988), as modified by Martin (1998) to expressly list steps implied within Abbot’s theory: 1) professional organization membership, 2) name change, 3) establishment of a code of conduct, 4) establishment of preparatory educational requirements, 5) establishment of examination requirements, 6) legal and/or regulatory actions, and 7) establishment of post-professional continuing education.68

The professional status of interior decoration, on the other hand, is less clear. In fact, serious confusion exists within the literature regarding interior decoration, exemplified by the fact that authors on the subject from the 1930s to the present day...

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use the two titles, interior decorator and interior designer, interchangeably and without consistency. After extensive historical and cultural analysis, Martin concludes that the practice of interior decoration does not meet the criteria for professionalization, attaining only two of the seven actions that characterize a profession. Martin determines that, “…interior decoration has not been successful in taking the necessary steps to establish itself as a profession, based on the professionalization literature and current standards.” Certainly from a standpoint of public operational understanding, the practice does not meet a professional threshold. Surprisingly, in the 15 years since Martin's seminal study, the confusion has intensified rather than progressed along an anticipated path to eventual professional status. The professional associations that provide organizational community for practitioners of interior decoration have, as one might expect, strengthened and expanded, and have participated in forceful legislative debate. However, the intent of such engagement has been to exclude interior decoration practitioners from statutory action; the associations have argued vehemently against professional categorization and denied professional responsibility for the health, safety, and welfare of the public. Concurrently, within the culture of the popular media, prevalent cable programming illustrates interior decoration as a do-it-yourself undertaking and emphasizes an aesthetic rather than theoretical approach to design. The notion of “good taste,” which to architects and interior design professionals results from the application of their specialized knowledge, is often presented – even

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Ibid.

Ibid., 270.
celebrated – as a talent mutually exclusive of expert skill, and serves to further confuse the viewing (and consuming) public.

Consequently, because it does not currently meet the criteria set forth in the literature, for the purposes of this study we shall discontinue our examination of the interior decoration practice in comparison to the practices of architecture and interior design. We must acknowledge that there are distinct issues with regard to competitive place-takings within the field of interior design that related to the practice of interior decoration, issues that are best examined in another context. Similarly, we must (and will) acknowledge that the confusion surrounding the practice of interior decoration plays a significant role in the competitive nature of architectural-interior design debate.

Architecture

Definition: Architecture

In operational terms, the most authoritative definition of architecture is found in state licensing statutes, the basis for architectural practice in all fifty states as well as four United States jurisdictions. Although the 54 definitions are not uniform in content or form, a comparison of the definitional language provides a consistent and cohesive foundation, in part because the definitions are rooted in building and life-safety codes – developed in either concert with or as a result of code adoption – but also because the language is typically modeled by legislative and statutory guidelines published by

National Council of Architectural Registration Boards (NCARB) since 1970. Nearly eighty-nine percent of current statutory definitions include a listing of tasks and/or services similar to the model definition published by NCARB. The NCARB model definition reads:

The practice of architecture, for purposes of the registration statute should be defined as consisting of providing or offering to provide certain services hereafter described, in connection with the design and construction, enlargement or alteration of a building or group of buildings and the space within the site surrounding such buildings, which have as their principal purpose human occupancy or habitation. The services referred to include pre-design; programming; planning; providing designs, drawings, specifications and other technical submissions; the administration of construction contracts; and the coordination of any elements of technical submissions prepared by others including, as appropriate and without limitation, consulting engineers and landscape architects. The practice of architecture shall not include the practice of engineering, but an architect may perform such engineering work as is incidental to the practice of architecture. No person not registered nor otherwise permitted to practice under the registration statute should be permitted to engage in the practice of architecture.

The definitions provide little in the way of formal delineation of an architect’s duties and tasks as separate from others (e.g., engineering, planning, interior design, ...
etc.) whose professional tasks and/or services would also be described in similar, if not exact terms. Thirty-one percent of the jurisdictions acknowledge within in their primary statutory definition of architectural practice the existence of cross-occupational tasks and grant practice permissions among engineering, planning, architecture and landscape architecture professionals as attendant to the primary work of each professional.  

It is important to note that most jurisdictions – if not all – acknowledge and address the procedural details of such permissions elsewhere in their statutes, rules and regulations, generally within associated codes of ethics and/or conduct referenced within the statute. Nevertheless, without patent and formal delineation of duties among the allied professions, such statutes and consequent regulations rely on the registrants themselves to fairly practice within their area(s) of expertise.

Two United States jurisdictions, four percent of the total, offer no formal definition of architectural practice, indicating only that an architect or other designated practitioner must be qualified and registered by the presiding state authority, thus providing for a plastic definition that may evolve alongside cultural, political, technical, social, environmental, and other circumstantial changes over time without statutory intervention.

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31.48%, or 17 of 54 jurisdictions, include in the statutory definition an acknowledgement of permissions granted to other professionals, primarily engineers. Two U.S. jurisdictions that regulate the practice of interior design, Georgia and Louisiana, acknowledge within their primary statutory definitions permissions for interior design practitioners with regard to coordination with architectural and engineering services.
Jurisdictional Claim: Architecture

In her 1998 study of the architectural design professions, Martin suggests that the establishment of the architectural education system has been perhaps the most crucial element in the development of the profession in that it provides defining standards both within the profession and without by engaging the public in its jurisdictional claim. Public sentiment is critical to obtaining the necessary social, cultural, and legal authority in a jurisdictional claim. “By revealing to the public some of its professional terminology and insights, a profession attracts public sympathy to its own definition of tasks and its own approach to solving them.” It is the public that will ultimately justify or deny the demand for the service over time and a fundamental understanding of the sometimes-nuanced differentiation between competing professions on the part of the public is necessary.

Abbott observes that public sentiment must be cultivated over a period of years, even decades. So, too, must the internal set of values and dispositions within a practice be cultivated and communicated to its members over time. A review of historical proceedings from the American Institute of Architects (AIA), founded in 1857, confirms the organizational leadership was grappling with these same issues of architectural identity, expertise, competition, and legally recognized authority from its inception. In the discussion that followed a paper presentation by Levi T. Scofield, FAIA

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78 Ibid., 61.
entitled *Architecture, the Sister Arts, and the Artistic Trades*, given at the 1899 Annual Convention, N. Clifford Ricker, FAIA, stated:

> It is certain that the function of the architect is not merely to design the structural and esthetic form of the monument, but equally to conceive its completed form, completed and beautified by sculpture, painting, and the minor arts. Since architecture must be the dominant of the building, heightened and accented by the other arts, the architect is alone competent to take the general charge of the design in all its parts. From this it results that the architect must be supreme in everything concerning the building, even in its furniture, or he cannot produce results comparable with those observed in the masterpieces of the great style of past ages.⁷⁹

Thus, a full 42 years after the organization’s inception, debate about the fundamental role of the architect, the importance of his unique knowledge and expertise, especially with regard to the subordinate role of others in the process, is still being formulated and strategized. At this point in time, there is also an introductory level of discussion regarding the strategic development of a legal definition of architecture and the institutionalization of its role in society. A review of individual AIA Chapter reports from the 1899 Annual Convention indicates that slightly more than one-third of the Chapters had discussed the question of state licensing of the architect or matters of regulation of general competitive code with regard to the award of significant public

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work with its relative constituency. At this point in time only one state, Illinois, had adopted a law regulating the practice of architecture, passed in 1897.

By 1908, nearly a decade later, proceedings from the December Annual Convention describe a distinct strategic interest in such laws but notes that the success of the direction is yet uncertain. In his opening address to the Convention, AIA president Cass Gilbert states, “Many of the states are considering laws for the licensing of architects, some have already passed such laws, whether with wisdom or not will only be proved by experience, but for the present it may be said that it is an experiment intended for the protection of the public and of the architect alike.” By December of 1908, only two states in addition to Illinois had successfully passed architectural practice laws, California in 1901 and New Jersey in 1902. Regardless of the seemingly slow progress on the state-by-state legislative path, a comparison of the 1899 and 1908 proceedings reveals significant expansion in the strategic advancement of a legislative and regulatory agenda to the federal, thus more comprehensive and authoritative front. In Abbot’s and other social theorists’ terms, the architectural

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80 Eight of twenty-two chapters indicated some level of discussion with their respective members regarding licensing and/or regulatory codes during the period between September 30, 1898 and September 30, 1899. These include Boston, San Francisco, Michigan, St. Louis, Kansas City, Colorado, Brooklyn, and Southern California.


establishment was well on its way to the development of a legal, jurisdictional definition of architecture and the institutionalization of its role in society. Not only did the AIA, on behalf of the profession, undertake a legislative agenda to broadly characterize the profession, but also to distinguish itself from its competitors. For example, from the 1908 Report of the Committee on the Allied Arts, “…this report should be sketched broadly on the Committee’s conception of the nature of architecture itself and its relation to the allied arts; and, more broadly still, the relation of art to the life of the people; and then the bearing of governmental direction or control upon the status of the art of architecture generally.”  

In two sentences, the report defines architecture and subordinates all other trades to it:

Architecture is the noblest of the fine arts and, in ministering to it, painting, sculpture, the decorative and the allied arts reach their richest and most effective forms….Architecture is builded beauty – not sculpted beauty, not painted beauty, not vocalized beauty, but builded beauty – the beauty which can be revealed only in sincere, truthful, harmonious beauty.

This same report describes the importance of the government’s recognition of the role of architecture to the success of the profession. To that end, distinguished members of the profession work toward the creation of a Government Bureau of Fine Arts and its guiding principles “…in view not only of the commanding position of architecture among

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85 Ibid., 36.
the arts, but also the magnitude and importance of the building operations under the Government – all of which should fall under one direction – the bureau and the commission should naturally take on a predominant architectural cast.\footnote{Ibid., 38.} In the same meeting, during a report from the Committee on Relations of the Architects to the Contracting System, the institute begins to take on the relationship of architects to other construction occupations. Here again, the organization seeks to utilize a jurisdictional claim – in this case a legal claim – for the exclusion or subordination of others:

In the days of ancient history, architects and builders were as one, class education in time made the architect a man apart and above the workman, universal free and higher education of the masses is bringing about a change in conditions; if we would preserve our professional position, our remedy lies in legislative enactment of which state examination and license is the primary step….a general contractor may be availed of and may be useful to the owner and all concerned, but a system which eventuates in the general contractor becoming not only the center of authority, but dominating the owner himself, and subordinating the architect to his control …is detrimental to the entire building interest.\footnote{William B. Mundie, “Committee on the Relations of Architects to the Contracting System,” Proceedings of the Forty-Second Annual Convention of the American Institute of Architects, Held at the New Willard Hotel, Washington, D.C., December 15, 16, and 17, 1908, edited by Glenn Brown (Washington, DC: Board of Directors, A.I.A., 1909), 66.}

Despite the fact that the AIA and the architectural profession lacks formal delimitation of its duties and tasks as separate from other occupations and professions – or perhaps in the face of this fact – its approach is to command full authority over all building functions. Even today, the general approach of the profession is one of producing a broad and often nebulous definition that allows control of the professional
environment regardless of the circumstance. Although the AIA officially adopts the aforementioned, detailed, uniform definition of architectural practice set by the National Council of Architectural Registration Boards (NCARB) as a matter of uniformity among the various United States statutes, the AIA’s public policy positions with regard to the design of structures and practice and title regulations reinforce a definition that is broad and all-encompassing in nature.  

2. Design of Structures for Human Occupancy or Use. The AIA maintains that to protect the health, safety, and welfare of the public, only architects should program and design all structures primarily intended for human occupancy or use. Architects are uniquely qualified through education, experience, examination, and practice to lead the design process to design buildings. The process of planning and designing the construction of buildings is complex, so sound professional judgment of an architect is needed before and throughout the design process and in construction. Therefore, it is incumbent on each jurisdiction that has a responsibility to the health, safety, and welfare of its citizens to ensure that the architect is engaged early in planning and managing the design of buildings. (approved March 2013, through December 31, 2015)  

The AIA’s approach is to command full authority over ‘all’ buildings for human occupation, stressing that it is the ‘only’ profession qualified to ‘lead’ the process at every stage: ‘before and throughout the design process and in construction.’ The organization further asserts its control through other related statements of public policy:

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89 Ibid., 6.
C. Public Policy: Regulation of Architecture. The practice of architecture should be regulated. The privileges and responsibilities of practice should be extended only to those architects who demonstrate through education, experience, and examination that they are ethically and technically prepared.\textsuperscript{90}

This public policy is reinforced by the following supporting position statement with regard to other potentially competing professions that practice in the built environment:

In the public interest, the AIA holds that only architects and engineers licensed through examination possess the necessary education, training and experience to protect the health, safety and welfare of the public in the built environment. Other individuals may possess useful skills in designing within the built environment, but fragmentation of responsible control of the building design process endangers and misleads the public as to respective areas of competence and expertise. The AIA opposes practice or title regulation of individuals or groups other than architects and engineers for the design of buildings. (approved March 2013, through December 31, 2015).\textsuperscript{91}

First and foremost, the AIA’s public policy positioning underscores the importance of the profession’s work to the public health and well being. Its “Meta” Policy, unnumbered and presented before all others as central and encompassing, states, “Architecture profoundly affects people. The work of architects is essential to human well being, and architects must embrace their ethical obligation to uphold this public trust.”\textsuperscript{92} Like other professions that acknowledge a significant role in public

\textsuperscript{90} Ibid., 6.
\textsuperscript{91} Ibid., 6.
protection such as those in the medical field, the architectural profession developed an independent organization with its sole purpose to protect the public; in some cases to protect the public despite the activities of the various professions. NCARB was founded in 1919, independent of the AIA and other professional organizations, to “…facilitate the exchange of information on examining, licensing, and regulating architects.” NCARB provides an independent examination and certification process to state regulatory boards, and thus the public, serving to identify qualified architecture practitioners. By placing the development of standards and practice regulation in the hands of an independent, semi-public organization, the architectural profession divorces issues of protection of the public from the potentially self-serving agendas of its professional organizations.

_Distinguishing Interior Design from Architecture_  
**Definition: Interior Design**

As a result of the broad nature of architectural legislative and statutory language that defines the practice of architecture, the all-encompassing character of the architectural profession’s public policy positioning, and an established public perception and understanding of architectural practice, practitioners of other professions operating in the “architectural sphere” must necessarily define themselves in relation to the architect. It becomes incumbent for other professions to distinguish themselves from architects in very specific terms – and to convince the powers that be on regulatory

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93 National Council of Architectural Registration Boards, _The History of NCARB_, 1.
boards, in legislatures, and in codes enforcement departments, among others, as well as the consuming public – that additional stratification is both appropriate and in the best interest of society.

This is certainly true of interior design in the statutory arena. As in architecture, the most authoritative definitions revolve around state licensing statutes, and thus definitions vary, evolving around localized statutory and regulatory concerns as well as around issues of competition and other political, social, and cultural matters. In much the same way the architectural claim to jurisdiction evolved, most definitions rely on model laws and statutory regulations first developed by the National Legislative Coalition for Interior Design (NLCID) and later updated and maintained by the Council for Interior Design Qualification (CIDQ), formerly NCIDQ, for use in promoting consistency across regulatory jurisdictions.\(^4\) As described in the “Foreward” of CIDQ’s Core Provisions of Interior Design Registration: Model Legislation, January 2010, the model text is, “…intended as a guide and to serve as an outline of sections which should be incorporated into any legislation undertaken regarding Interior Design….This guide presents the most desired standards for successful and enforceable legislation, tempered by the reality of the legislative process and the hands-on experience over the

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past dozens years ....”95 The CIDQ model legislation language defines interior design practice as follows:

6. “Practice as a Registered Interior Designer” defined. “Practice as a Registered Interior Designer” means the rendering, by a person registered by this bill/statute, of services to enhance the quality and function of an interior area of a structure designed for human habitation or occupancy. The term includes:
   (a) An analysis of:
      (1) A client’s needs and goals for an interior area of a structure designed for human habitation or occupancy; and
      (2) The requirements for safety relating to that area;
   (b) The formulation of preliminary designs for an interior area designed for human habitation or occupancy that is appropriate, functional and esthetic;
   (c) The development and presentation of final designs that are appropriate for the alteration or construction of an interior area of a structure designed for human habitation or occupancy;
   (d) The preparation of contract documents for the alteration or construction of an interior area of a structure designed for human habitation or occupancy, including specifications for partitions, materials, finishes, furniture, fixtures and equipment;
   (e) The collaboration in the completion of a project for the alteration or construction of an interior area of a structure designed for human habitation or occupancy with professional engineers or architects who are registered in this jurisdiction;
   (f) The preparation and administration of bids or contracts as the agent of a client; and
   (g) The review and evaluation of problems relating to the design of a project for the alteration or construction of an area designed for human habitation or occupancy during the alteration or construction and upon completion of alteration or construction.

In an attempt to define relative distinctions between interior design and architecture, the definition of interior design necessarily serves to pinpoint much in the way of overlapping services. For example, when compared with the NCARB legislative definition of the practice of architecture which describes “the design and construction …of a building or a group of buildings and the space within …such buildings, which have as their principal purpose human occupancy or habitation,” the CIDQ model legislative language states, “‘Practice as a Registered Interior Designer’ means the rendering …of services to… an interior area of a structure designed for human habitation or occupancy ….” Undoubtedly, the CIDQ clause attempts to limit the practice of interior design to the interior area of the structure rather than its entirety. The inclusion of the restricting clause that limits the work of an interior designer to “an interior area” appears in six out of eight major (lettered) clauses within the definition. However, other than titling NCARB’s “space within” as an “interior area of a structure,” the CIDQ language is virtually identical to NCARB’s. Hence, according to both definitions, architects and interior designers claim to provide the same service within the interior area of a structure designed for human habitation.

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In a further attempt to clarify the specialized skill of the interior designer, or perhaps in deference to legal limitations imposed by the architectural profession – primarily that only architects and engineers may engage in structural design – an additional definition is referenced in the CIDQ model language document. The definition, to be read in concert with the definition of interior design practice, states:

5. “Partition” defined. “Partition” refers to a wall that divides a space that is not part of the building’s structure nor serves the building’s load path. A partition supports its own weight and may be designed to provide varying levels of visual and acoustical privacy, smoke and fire resistance, and load attached to it such as cabinetry or grab bars.98

Both architectural and interior design definitions have many functional terms – and tasks – in common. “Designs,” “drawings,” “specification,” and “administration of contracts” appear throughout both NCARB and CIDQ model definitions. Interestingly, similar but slightly subordinate terms appear in the interior design definition as well. For example, the NCARB model language refers to the “coordination of any elements of technical submissions prepared by others” while the CIDQ model language describes the “collaboration in the completion of a project …with professional engineers or architects…” seemingly limiting the supervisory role of the interior designer.

Further comparative analysis of the two definitions highlights the interior design agenda to identify unique skill sets from those of architecture. Use of the terms “functional,” and “esthetic,” which do not appear anywhere in the architectural definition,

serves to distill the essence of the interior design practice. Similarly, the CIDQ listing of specification examples in 6.(d) identifies a greater level of detail than is presented in the architectural definition, presumably referring to an expertise in interior partitions, materials, finishes, furniture, fixtures, and equipment. Additionally, as if to placate the architectural profession in a formalized recognition of skill limitations in comparison to architectural practice, the definition of interior design practice calls out what might be otherwise considered issues of minimal competency or obligation under the laws: an “understanding and application of the appropriate building code(s)” (see 6.(h) above) and the recognition that collaboration with architectural and engineering expertise will likely well be required (see 6.(e) above). These distinctions are undocumented in the architectural definition; such core competencies are ostensibly implied.

Paradoxically, the inclusion of the restricting clauses outlines a very specific interior design expertise as unique from architecture and at the same time reinforces an architecturally-based proficiency that, under most architecture statutes, the interior design profession it is not qualified to render.

Jurisdictional Claim: Interior Design

Like the architectural profession, the interior design profession frames its jurisdictional claim within the public arena around its primary task of protecting the health, safety, and welfare of the public. The first statement in the “General Provisions” section of CIDQ’s model legislation states, “The purpose of this chapter is to safeguard life, health and property, as consumer protection, and to promote the public welfare by
improving the quality of human life.\textsuperscript{99} The prevention of harm and the protection of public health, safety, and welfare is the overarching purpose of the statute; it is the sole reason to provide for the regulation of any profession.\textsuperscript{100} Consistent with its architectural counterpart, CIDQ was founded in 1972, independent of professional associations in order to establish standards of competence for interior design professions, to identify to the public competent professionals, to provide research and expertise that informs state and provincial licensing laws and regulations for the interior design profession, and to maintain and update model statutory language and regulations for the purposes of promoting consistency among jurisdictions.\textsuperscript{101}

For interior designers, as for architects, medical professionals, and other professionals charged with the protection of the public, it is through the application of specialized knowledge, referred to by Abbott as “abstract knowledge,” that the foundation for a jurisdictional claim is made and the strength of a jurisdictional claim is established.\textsuperscript{102} Moreover, just as in architecture, jurisdictional claims must be made through the effective dissemination of those claims to the public. In order to attain social, cultural, and legal authority essential to its claim, a profession must be clear to its


public — and to its internal practitioners — vis-à-vis its professional expertise, its tasks, and its approach to solving them.103 Yet, although the phrase “protection of the health, safety, and welfare of the public” is often used expressly in association with the interior design profession in legislative and regulatory language, definitions of health, safety, and welfare are often inadequate to effectively link to the specialized knowledge of interior designers.104 In an examination of the definition of these three terms as they appear in the literature, including dictionaries, publications by government and public entities, and interior design-based publications, Guerin and Martin found:

At the mile-high level, the terms “health, safety, and welfare” seem to be relatively straightforward and clear. However, upon closer inspection, the terms are not as well understood by the public, i.e., the people interior designers protect, and, often, by interior design practitioners themselves. Although interior designers are aware of the value a well-designed, supportive interior environment can bring to its occupants, interior designers generally do not articulate these types of overarching benefits to themselves or their clients. This omission may occur because practitioners do not consciously promote the value of interior design to their clients because they assume the protection of the public is inherent in practice. Therefore, it is important to define the terms “health,” “safety,” and “welfare” to clarify their meanings so interior design practitioners can articulate to their clients and the public 1) the value of designing to prevent harm and 2) clearly understand the ways in which their practices protect the public.105

103 Ibid., 60


Further, Martin and Guerin considered the various definitions’ relationship to the abstract knowledge in the interior design body of knowledge, and developed the following definitions to reflect the operative knowledge of interior design practitioners:

Definition of Health as Related to Interior Design Practice: Interior designers create interior environments that support people’s soundness of body and mind; protect their physical, mental, and social well-being; and prevent disease, injury, illness, or pain that could be caused by occupancy of interior environments….

Definition of Safety as Related to Interior Design Practice: Interior designers create interior environments that protect people against actual or perceived danger; protect against risk from crime, accidents, or physical hazards; and prevent injury, loss, or death that could be caused by occupancy of interior environments….

Definition of Welfare as Related to Interior Design Practice: Interior designers create interior environments that support people’s physical, psychological, social, and spiritual well-being; and assist with or contribute to their financial or economic management, success, and responsibility.¹⁰⁶

Like the statutory language defining interior design practice, the new definitions suggested by Guerin and Martin seek to outline a specific interior design expertise as unique from architecture. Furthermore, as in the comparison of statutory language of the architectural practice, it seems that at the same time, the definitions continue to reinforce architecturally based proficiencies. NCARB defines “HSW,” as, “…the abbreviation for required health, safety, and welfare requirements as defined and mandated by the AIA …and state licensing boards….It is anything that relates to the

¹⁰⁶ Ibid., E25-E28.
structural integrity, soundness of a building, or building site." The NCARB definition includes a direct link to the AIA guidelines for the continuing education system. Here the AIA defines the components of HSW as follows:

- **Health** Aspects of architecture that have salutary effects among users of buildings or sites and address environmental concerns.

- **Safety** Aspects of architecture intended to limit or prevent accidental injury or death among users of the buildings or sites.

- **Welfare** Aspects of architecture that engender demonstrable positive emotional responses among, or enable equal access by, users of buildings or sites.

Just as can be concluded from the comparison of architectural and interior design statutory definitions, the exceedingly broad approach of the architectural profession’s definitions of health, safety, and welfare necessarily overlaps with interior design practitioners in the architectural space.

In order to further demarcate the jurisdictional boundaries of interior design practice, Martin and Guerin used content analysis to identify sixty-five distinct knowledge areas within the interior design body of knowledge, organized into six principal categories:

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1) Communication: includes communication; construction documents; critical listening; presentation(s); sketching; visual, written, and verbal design communication methods and techniques; and written form of agreement;

2) Design Theory and Process: includes acoustical design principles; color and light principles and theories; color principles, theories, and systems; creative thinking; design concept; design process; design theory; evaluating existing premises, including space allocation, furnishings, equipment, and other attributes of the existing environment; evidence-based design; historical precedent to inform design solutions; natural and electrical lighting design principles; principles of thermal design; problem solving; space planning; sustainability concepts, principles, and theories; and wayfinding;

3) Human Environment Needs: Research and Application: includes business, organizational, and familial structures; ecological, socio-economic, and cultural contexts; globalization; human factors; lighting, acoustics, thermal comfort, and indoor air quality principles; occupant well-being and performance; post-occupancy evaluation; research; theories about the relationship between human behavior and the designed environment; and universal design;

4) Interior Construction, Codes, and Regulations: includes building construction; building systems; calculations; code requirements, laws, standards, regulations, accessibility, and sustainability; critical path; interior construction; laws, codes, standards, and guidelines that impact the design of interior
spaces; life safety; regulations and ordinances; and researching life safety and code requirements, project type location, and access;

5) Products and Materials: Evaluation, Installation, Specifications, Inspection:
includes building materials and finishes; custom work; floor, wall, and ceiling systems; furniture, fixtures, equipment, and finish materials; installation; interface of furniture with distribution and construction systems; performance criteria; and the selection and application of products and systems and impact on indoor air quality; and

6) Professional Practice: Principles, Methods, and Tools: includes budgeting and estimating costs; business development; business practice; consultations with consultants; contributions of interior design to contemporary society; ethical and accepted standards of practice; financial management; legal aspects of the contracts; legal recognition for the profession; liabilities; multi-disciplinary collaboration; office procedures and regulations; professional development; and project management. 109

Martin and Guerin found that all categories, with the exception of Professional Practice, are perceived as contributing substantially to the interior design body of knowledge. Furthermore, all categories contribute at the substantial level to health, safety, and welfare. 110

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110 Ibid., E38-E48.
Clearly the interior design profession has developed and documented its body of knowledge, evidenced by a series of notable and complex investigations. Yet, the act of such documentation is only a part of an iterative process that continues the development and ensures the survival of the profession. It is the dissemination of the body of knowledge to the practitioners, those who through their practice (“work” in Abbott’s terms), continue to define, increase, and append abstract knowledge. This supplemental knowledge will, in turn, further develop the ever-evolving interior design body of knowledge. The objective of Guerin and Martin’s most recent investigation, discussed above, was, at its most basic level, intended to bring up to date the previously documented interior design body of knowledge. However, on another level, the investigation was deliberately “…completed in response to the need for the profession to determine its jurisdictional knowledge boundaries as they relate to design for the public’s HSW [health, safety, and welfare] and to document for the public what interior designers do to protect them from harm, as it is the public for whom interior design work is done.” As a result of this goal, the 2010 Martin and Guerin study – and the resultant interior design body of knowledge – has been widely disseminated to the profession and to the public. In fact, each body of knowledge study, beginning with the first publication in 2001, has been funded by the professional interior design


associations in North America. The most recent study (2010) documenting the body of knowledge and studying its relationship to public health, safety, and welfare was collectively funded and published by a consortium of North American professional interior design organizations and entities comprised of the American Society of Interior Designers (ASID), the Council for Interior Design Accreditation (CIDA), the Interior Designers of Canada (IDC), the Interior Design Educators Council (IDEC), the International Interior Design Association (IIDA), and the Council for Interior Design Qualification (CIDQ). A website, entitled IDBOK.com, is sponsored by all consortium members and provides free and public access to the body of knowledge studies, general information on the importance of abstract knowledge and the body of knowledge to professional advancement, and abstracts of recent interior design research. Links to the BOK website are provided on each consortium member's website.

In tandem with and building on the goals of the documentation and the publication of the interior design body of knowledge, the interior design industry has conceived and funded a significant collaboration between professional association and the academy to facilitate both the ongoing development of the body of knowledge and the broad dissemination of its product. The result is a clearinghouse and source for design and human behavior research. InformedDesign® operates as a repository for academic and empirical research data; design and human behavior research that pertain to the design of the built environment and comprises the abstract knowledge of the interior design profession are collected, interpreted, and disseminated through a
searchable database that provides public access to research in “practitioner friendly language and presentation” for use by interior design practitioners, researchers, students, code officials, allied practitioners, industry partners, legislators, and the general public.  

InformeDesign®, and sites and services like it, assist the interior design profession in strengthening its jurisdictional claim of public health, safety, and welfare. “InformeDesign enables practitioners to use current, research-based information as a decision-making tool in the design process, thereby improving the quality of design solutions and enhancing the public’s health, safety, and welfare.” For example, a topical search of research issues using the InformeDesign® searchable database yields more than 7,600 scholarly articles under the headings of “Codes and Safety,” “Personal/Individual Needs and Factors,” which include categories of physical and psychological needs and factors, and “Social Needs and Factors,” all of which align closely with the principal categories of knowledge areas within the interior design body of knowledge most associated with the protection of health, safety, and welfare (see Figure 1.4).  

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It is in the same interest in its professional advancement and the assertion of its jurisdictional claims that the most extensively distributed definition of the interior design profession and its scope of work was developed and adopted by the collective interior design industry and published by CIDQ in 1990, some fifty-nine years after the formation of the first interior design professional association in North America; just sixteen years after CIDQ was formed to support the growing base of state regulatory requirements.\(^ {116} \) With widespread assistance by leadership from the interior design organizational

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establishment across North America, the development of the definition was a concerted
effort to disseminate a uniform and largely synchronized understanding of the interior
design profession.

As such, this definition forms the basis of general information provided to the
public about the practice and profession of interior design. The current collaborative
definition reads:

Interior design is a multi-faceted profession in which creative and
technical solutions are applied within a structure to achieve a built
interior environment. These solutions are functional, enhance the
quality of life and culture of the occupants and are aesthetically
attractive. Designs are created in response to and coordinated with the
building shell and acknowledge the physical location and social
context of the project. Designs must adhere to code and regulatory
requirements, and encourage the principles of environmental
sustainability. The interior design process follows a systematic and
coordinated methodology, including research, analysis and integration
of knowledge into the creative process, whereby the needs and
resources of the client are satisfied to produce an interior space that
fulfills the project goals.

Interior design includes a scope of services performed by a
professional design practitioner, qualified by means of education,
experience and examination, to protect and enhance the health, life
safety and welfare of the public. These services may include any or all
of the following tasks:

- Research and analysis of the client’s goals and requirements;
  and development of documents, drawings and diagrams that
  outline those needs
- Formulation of preliminary space plans and two and three
dimensional design concept studies and sketches that integrate
  the client’s program needs and are based on knowledge of the
  principles of interior design and theories of human behavior
- Confirmation that preliminary space plans and design concepts
  are safe, functional, aesthetically appropriate, and meet all
  public health, safety and welfare requirements, including code,
  accessibility, environmental, and sustainability guidelines
• Selection of colors, materials and finishes to appropriately convey the design concept and to meet socio-psychological functional, maintenance, lifecycle performance, environmental, and safety requirements
• Selection and specification of furniture, fixtures, equipment and millwork, including layout drawings and detailed product description; and provision of contract documentation to facilitate pricing, procurement and installation of furniture
• Provision of project management services, including preparation of project budgets and schedules
• Preparation of construction documents, consisting of plans, elevations, details and specifications, to illustrate non-structural and/or non-seismic partition layouts; power and communications locations; reflected ceiling plans and lighting designs; materials and finishes; and furniture layouts
• Preparation of construction documents to adhere to regional building and fire codes, municipal codes, and any other jurisdictional statutes, regulations and guidelines applicable to the interior space
• Coordination and collaboration with other allied design professionals who may be retained to provide consulting services, including but not limited to architects; structural, mechanical and electrical engineers, and various specialty consultants
• Confirmation that construction documents for non-structural and/or non-seismic construction are signed and sealed by the responsible interior designer, as applicable to jurisdictional requirements for filing with code enforcement officials
• Administration of contract documents, bids and negotiations as the client’s agent
• Observation and reporting on the implementation of projects while in progress and upon completion, as a representative of and on behalf of the client; and conduction of post-occupancy evaluation reports.117

In addition to the principal text that presents a qualitative notion of interior design, the CIDQ definition includes an extensive bulleted listing of practical services and tasks.

that comprise interior design practice. In order to provide a greater level of detail and understanding, the CIDQ definition also includes a glossary of detailed terms. This “Glossary of Terms” includes words and phrases, many of which are highlighted as embedded links in the definition body (noted as bold in quotation above), that specify each term as it relates to the work of an interior designer. Glossary terms include: “Accessibility,” “Building Shell,” “Construction Documents,” “Contract Documents,” “Contract Administration,” “Environmental,” “Maintenance,” “Non-structural or non-seismic,” “Partition,” “Programming,” “Reflected ceiling plan,” “Space planning,” “Specifications,” and “Sustainability.”

As suggested by Abbott, the strength of this collaborative definition is in its clarification of the interior design approach. Unlike the statutory definition of interior design, this definition seeks not only to demarcate the practice in general but also to hone in on the way interior designers perform the listed tasks in relation to their unique knowledge and expertise; the stuff of an effectual jurisdictional claim. For example, rather than a technical description found within the statutory definition, “…The preparation of contract documents for the alteration or construction of an interior area of a structure designed for human habitation or occupancy, including specifications for partitions, materials, finishes, furniture, fixtures, and equipment …”, corresponding illustrative descriptions in the collaborative definition such as, “Selection of colors, materials and finishes to appropriately convey the design concept and to meet socio-

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118 Ibid.

psychological functional, maintenance, lifecycle performance, environmental, and safety requirements”, and the “Selection and specification of furniture, fixtures, equipment and millwork, including layout drawings and detailed product description; and provision of contract documentation to facilitate pricing, procurement and installation of furniture” reveal the unique nature of interior design practice.\footnote{Council for Interior Design Registration, Inc., Core Provisions of Interior Design Registration: Model Legislation, 1. See full passage under subheading Distinguishing Interior Design from Architecture in text above; and Council for Interior Design Qualification, Inc., Definition of Interior Design, 2004. See full passages in preceding blocked quotation. Emphases in original quotation removed by author.}

design services or pursuing educational paths and/or careers in interior design.

Similarly, an internet search using the language from the first line of the NCIDQ definition yielded a host of results from businesses – firms, product manufacturers, and related organizations – that, like the professional associations, publish either the definition in large part or link directly to CIDQ’s definition website. Among these are the National Institute of Building Design, a number of legislative coalitions such as the Interior Design Legislative Coalition of Pennsylvania, as well as university interior design and architecture programs such as University of Oklahoma and Michigan State University. Further, to emphasize the penetration of this industry-wide definition of interior design, a brief review of recent introductory and/or professional practice textbooks in interior design, texts by Corky Binggeli, Cindy Coleman (edited), and Christine M. Piotrowski likewise reproduced and/or referenced the official CIDQ definition of interior design.

Despite the fact that the focus of this research work is on the positioning of the interior design profession’s jurisdictional claim within the professional architecture

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sectors, and interior design’s distinction as a separate profession, it is important to acknowledge here that a similar, perhaps derivative case is being made by the interior design profession to distinguish itself from the interior decoration and decorative arts fields. This distinction is necessary in large part because of continued confusion on the part of the consuming public; the interior design profession's jurisdictional claim in the architectural realm is only complicated by ambiguities between the work of qualified interior designers and that of decorators. As mentioned previously, the circumstances and dynamics of this debate are not examined in detail in this work. However, we must recognize that any claim to jurisdictional boundaries by the interior design profession inevitably effects its positioning with respect to architecture as well as interior decoration practices. Certainly the statutory language contained in the definitions and jurisdictional claims examined thus far takes care to emphasize the depth of interior design practice methodology and to underscore the notion that each action of an interior designer impacts the health, safety, and well-being of the public, the primary distinctions that set interior design apart from the practice of interior decoration. Yet, since few states presently regulate the practice of interior design, the terms “interior design” and “interior decoration” may in many cases be legally used interchangeably.

To assist in this clarification, CIDQ has included on its website a page devoted to particularizing the differences between interior design and decorating. Although one may navigate to the page from several locations, its primary links reside on the pages developed for “Member of the Public” and “Media Representative,” in an attempt to reach the target audience for the message. The CIDQ page describes the differences
between interior design and decoration: “Interior design is the art and science of understanding people’s behavior to create functional spaces within a building. Decoration is the furnishing or adorning of a space with fashionable or beautiful things. In short, interior designers may decorate, but decorators do not design.”

**Place-takings in the Architectural Space**

Bourdieu’s theoretical framework – and terminology – is particularly useful in understanding the current makeup of the architectural professional field and the relative positions of the architecture and interior design disciplines within it. The architectural discipline, a highly organized group, is located at the dominant pole. Its professional status is predicated on a perceived value to society and its role in the protection of the health, safety, and welfare of the public. In the discipline’s attempt to make itself ever more exclusive, it has employed a number of bureaucratic and legal systems to narrow the circle of practitioners while, at the same time, reiterating their societal and professional roles in very expansive terms. This is evidenced by the profession’s practice and title regulations and public policy positions reserving design authority over the design of all structures intended for human habitation and also claiming singular authority over the public health, safety, and welfare of the public in the built environment.

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At the subordinate position reside the highly trained, qualified interior designers, sometimes referred to as interior architects. This group of designers, less politically and socially organized than architects, and less endowed with material or symbolic capital, share a number of skill sets in common with architects and, while they claim a specialized expertise with respect to interior space and materials, compete with architects in their assertion of authority over certain built environments. Although traditionally relegated to a subordinate position, frequently considered a subset of architectural practice, a movement to recognize interior design as a distinct discipline has been building since the 1970s and follows closely the same path to professional recognition as architects and engineers during their rise to professional status during the late nineteenth and early twentieth centuries. Much like the competitive threat from the building trades and craftspersons in the late 1800s (see subheading Defining a Profession | In the Literature above), the architectural community has responded in force to the perceived threat to their dominant position(s) by interior designers on a number of fronts: 1) Coalescing their substantial material and symbolic capital, the architectural community has sought to restrict the practice of interior design from expanding into the architectural field on the basis of the architects’ unique status as protectors of the public health, safety, and welfare. For example, political, legislative, and regulatory actions restrict interior design practice to small, insignificant spaces by

Policies and Position Statements, as Amended by the Board of Directors, March 2013. 6-8. See full passages above under subheading Defining a Professional Threshold: In Practice: Architecture: Definition in text above.
requiring that work in buildings over a certain square footage require the oversight of licensed architectural or engineering professionals. This foregrounds the argument that interior design practice poses a potential threat to the public. 2) At the same time, architecture associations launched a media campaign to assert the architectural professions’ dominance by de-emphasizing the impact of interior design on public health, safety, and welfare. For instance, in a speech delivered during an NCARB annual meeting and published in A Report from the President in Direct Connection newsletter, NCARB Executive Joseph P. Giattina, Jr., FAIA, railed against recognition and licensure of interior designers, stating, “…while bad taste might be offensive, there is no evidence that anyone has been killed by a bad color scheme.”

By portraying interior design as a purely decorative endeavor, in alignment with the practice of interior decoration rather than interior design, the architectural community reinforces its position of authority. 3) In response to the very real economic threat – or perhaps economic opportunity – of interior design practice, the architectural community is embracing the practice of interior design as a subset of architecture, effectively appropriating the discipline into its own hierarchical ranks. For example, many architecture firms house interior design departments and offer interior design services through their own practices, some hiring interior design staff directly, some through the process of subcontracting work to independent interior designers. For example, a recent review of employers of University of Cincinnati cooperative students in the School of Architecture

and Interior Design illustrates this point. Out of 365 firms employing students in the years 2010, 2011, and 2012, 110 firms, or thirty percent, employed interior design students, yet only twenty firms, five percent of the total number of firms, provided interior design services exclusive of an architectural practice. This trend is evident in the broader interior design market as well. A review of the websites of Interior Design magazine’s list of the top 100 United States design firms that earned the highest annual design fees, known as the “2012 Top 100 Giants,” reveals that sixteen percent of the firms offer interior related services only.

Similarly, architectural schools commonly operate interior design programs under their auspices, and there is an increased potential for even more to be merged in an economic climate that promotes funding-driven restructurings. There is also much debate within the field related to the recent trend of renaming traditional “interior design” programs to operate under the title “interior architecture.” For example, at the 2012 Interior Design Educators Council (IDEC) annual meeting, three conference sessions, including one featured “Village Square: Critical Issues Session” were devoted to matters of nomenclature and the implications for interior design students, educators and...
institutions, and practitioners. The topic was taken up again in at the 2013 annual meeting including another featured “Village Square: Critical Issues Session” entitled “Interior Design/Interior Architecture… the Conversation Continues.”

It seems paradoxical at best that the dominant architectural sector uses contradictory arguments to combat and denigrate its competition, while simultaneously working to actively appropriate its subordinate production. Yet, each of the reactions speaks to a different potential audience and, by tripling their efforts, they effectively increase their chances of victory. If the architectural associations and organizations, along with allied media outlets and other networks of professionals are successful in convincing their respective audience(s) that their claims are both right and reasonable, then the discipline stands to gain materially by the subjugation of the interior design threat. The architectural profession’s efforts serve to reify the groups’ own social, legal, and cultural legitimacy through the expression of symbolic power and the manipulation of belief.

Like its architectural counterpart, the interior design profession attempts to defend its right to the jurisdictional space by making its own assertions to persuade

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public and legislative opinion. For example, a key argument targeted toward lawmakers in Tennessee discloses that proposed interior design legislation:

…corrects an existing artificial restraint of trade imposed by the architectural profession and promotes equal opportunity for interior designers that will lead to a more vibrant, competitive marketplace. They claim that interior designers who have extensive qualifications are currently barred from practicing to the full extent of their training and capabilities because Tennessee architectural law and regulatory board policy unfairly limits and/or restricts their scope of work and imposes artificial financial and construction-related barriers that prevent consumers from utilizing interior design services.\(^\text{132}\)

However, as a unified discipline, interior design has been only moderately successful in improving its status. While there are presently thirty-six state interior design laws enacted in North America that recognize the title of interior design, to date only six states and United States territories (Alabama, Louisiana, Florida, Nevada, District of Columbia and Puerto Rico) and one Canadian province (Nova Scotia) have laws that regulate the practice of interior design in addition to protecting a regulated title. Twenty-two states and seven Canadian provinces have regulation that restricts a defined title; twenty-four states have no interior design regulation.\(^\text{133}\)

Bourdieu suggests that effective change in the field, what he refers to as a “rupture” in the relationship between the dominant and the dominated, is predicated on

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Chapter One
problematization. Rather than taking the situational condition for granted, critical
evaluation of the circumstance poses new knowledge that allows for novel viewpoints,
consciousness, reflection, action, and eventual transformation. In addition to wielding
very little material and social capital, a primary reason for the limited success of the
interior design discipline lies in the fact that it has not yet effectively problematized the
issues around its subjugation. At a collective level the issues have not yet been
considered as challenges, problems to be solved strategically in order to intervene in
the current trajectory and transform the outcome.

Critical examination of the field – the architectural market space – and the
posing of fundamental questions of contribution and unique value as problems to be
solved, will provide not only a path to strategic action but also to skillful articulation of
the proposition as a means to change the present condition. As in the example of
Robert Venturi’s successful manifesto as an entre to the field of architectural production,
Bourdieu proposes to use the very fundamental belief system that empowers the
dominant group to obtain new insight into the construct. It is in that spirit that this study
is undertaken.

The process of becoming a profession is nothing if not complicated. It is affected
by external dynamics such as broad social, political and economic conditions, and
demographics, as well as public perception and public opinion. It is also impacted by
complex internal dynamics, the result of the influences of individuals from within the

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profession, those who are responsible for the organization, vision, and articulation of that vision for the future of the profession.\textsuperscript{135} To achieve an effective shift in the existing positions-taking between the architectural and interior design sectors, the interior design community must utilize the very foundation of the architects’ claim to status – the protection of the health, safety, and welfare of the public – and apply its principle to its own practice. A new manifesto, the strategic production of a rigorous study and documentation of harm by interior design practitioners, a study that employs precisely the same standards and measures as used to gauge architecture’s protection of the public, is necessary.

This is why the strategy \textit{par excellence} is the ‘return to the sources’ which is the basis of all heretical subversion and all aesthetic revolutions, because it enables the insurgents to turn against the establishment the arms which they use to justify their domination, in particular, asceticism, daring, ardour, rigour, and disinterestedness. The strategy of beating the dominant groups at their own game by demanding that they respect the fundamental law of the field, a denial of the ‘economy’, can only work if it manifests exemplary sincerity in its own denial.\textsuperscript{136}

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{135} Martin, “Professionalization: Architecture, Interior Decoration, and Interior Design as Defined by Abbott.”
\item \textsuperscript{136} Bourdieu, \textit{The Field of Cultural Production}, 84.
\end{itemize}
\end{footnotesize}
Study Design | Methodological Approach

Problem Identification

According to the American Society of Interior Designers (ASID) and the International Interior Design Association (IIDA) codes of ethics, the first priority of interior designers must be the protection of the health, safety, and welfare of the public.¹ Setting aside for the moment the motivation of the interior design profession to be recognized for its contribution to the health, safety, and welfare of the public as a means to maneuver for position in a competitive market of architectural and design services – the “place-takings” described in Chapter One -- this responsibility for the protection of the public is paramount and the dangers very real. Proper selection of interior space

content – the selection, specification, arrangement, and/or installation of interior finish materials and interior space content such as furniture, fixtures, and equipment provided as part of a scope of interior design services – is the very issue with which interior designers grapple daily and for which many are specifically trained. Appropriate specification and placement of interior space content is historically a primary determinant of whether accidents become tragedies.\(^2\) Uninformed choices can have devastating results. Yet, the value interior design offers for the protection of life and property within the built environment is often woefully underappreciated and largely unrecognized by the public, code officials, legislative and regulatory bodies, and allied professions – even by some within the field of interior design. Not only are interior designers’ roles often minimized during the design/construction process, but also their participation in the development and implementation of life safety codes is seldom sought.

**Seriousness of the Fire Problem**

This devaluation of the expertise and contribution of interior designers is surprising because there is overwhelming evidence that the fire and death rates in the United States is among the deadliest in the industrialized world, despite the fact that it outspends other nations on fire protection for buildings by a factor of ten or more\(^3\). The

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United States has the highest number of annual fire deaths of twenty-seven industrialized nations, nearly twice the annual number of deaths of the second highest in the listing, Japan. When represented as a per capita number in relation to its total population, the United States’ position improves, dropping to fifteenth among nations with the highest number of fire deaths, placing the nation in the upper half of the countries reviewed. However improved the position may be, risks from fire in the United States remain very real. The loss of life and the economic loss from fire are staggering. For 2010, the latest data that are available, the National Fire Protection Association (NFPA) estimated the total cost of fire in the United States at $328 billion, or

States spent $41.5 billion in 2009 on the cost of fire protection in buildings, followed by the United Kingdom ($4.85 billion), the Netherlands ($2.65 billion), Sweden ($866 million), Singapore ($604 million), New Zealand ($323 million), the Czech Republic ($317 million), and Japan ($6 million). There is no comparable data regarding the cost of fire protection for Canada, Denmark, France, Hungary, Italy, Norway, and Slovenia.


4 The Geneva Association, World Fire Statistics Bulletin 28 (October 2012), 4-5. Adjusted figures for 2009 fire deaths list 3,300 deaths in the U.S., followed by Japan (1,900), France (595), Poland (565) Germany (540), and the United Kingdom (460). The lowest recorded number of fire deaths in 2009 occurred in Singapore (1).

5 Ibid., 5. For the years 2007-2009, deaths per 100,000 persons in the U.S. totaled 1.17. Countries with higher death rates per 100,000 persons include Finland (1.98), Romania (1.86), Hungary (1.68), Barbados [2007 – 2008] (1.65), Japan (1.57), Poland (1.53), Greece (1.41), Denmark (1.41), Sweden (1.37), Norway (1.33), Czech Republic (1.30), Belgium [2004] (1.21), and Ireland (1.19).
2.2 percent of United States gross domestic product.\(^6\) The largest components in the 2010 NFPA total cost study include: $14.8 billion in economic losses including direct property damage ($13.2 billion) and indirect loss such as business interruption, costs of temporary housing, and missed work ($1.6 billion); $47.5 billion in indirect economic costs including the costs of fire system maintenance, fire retardants, disaster recovery plans and backups, costs of preparing and maintaining fire protection standards, and the costs of meeting “fire grade” standards in the manufacture of equipment; $31.7 billion in new building construction costs for fire safety and fire protection considerations such as, built-in fire protection systems, compartmentation features, and treatments of or limitations on exterior surfaces; $42.6 billion for the cost of local career fire departments expenditures and direct purchases by volunteer fire departments financed by municipal or other funding sources; $140.7 billion for the monetary value of donated time from volunteer fire fighters; and $19.2 billion in net costs of insurance coverage for fire, the difference between the premium collected and the cost of claims paid. In addition, the NFPA total fire cost study includes $31.9 billion in estimated monetary loss for civilian and firefighter deaths and injuries due to fire.\(^7\)


\(^7\) Ibid. It is important to emphasize that the inclusion of such a calculation in the NFPA study does not suggest that there is an acceptable price for loss of life. Rather, the figures in the study are intended to reflect “a social consensus on the value of changes in the risk of death by fire” (p. 23).
Relationship to the Interior Design Profession

A specially commissioned task force on fire and the built environment\textsuperscript{8} determined that two of the five most significant reasons for the high fire mortality rate in the United States fell precisely within the interior designer's domain – interior space content. These reasons, listed as “critical issues” in the task force report were:

1. A failure of standards to control building content presents serious dangers, particularly when incremental occupancy or use changes occur; and

2. Most modifications to interior space content in existing buildings are governed by superseded codes until significant alterations trigger implementation of current standards.\textsuperscript{9}

Both issues underscore weaknesses in comprehensive life safety code enforcement over the life of a building. Regulation of a building’s interior space content – interior finishes and furnishings -- often slips through the cracks, and, as a result, compromises the public’s safety.

Interestingly, no interior design voice was included on Task Force 4: Fire and the Built Environment, despite the fact that “hazards through design” were identified as a

\textsuperscript{8} Task Force 4: Fire and the Built Environment, one of seven task forces assembled for a 1987 conference conducted by United States Fire Administration (USFA) / Federal Emergency Management Agency (FEMA), which included individuals from business and governmental organizations with an interest in fire protection. The purpose of the workshop was to achieve a consensus on the nature of the U.S. fire problem, review progress since the 1974 America Burning report (published by the 1971 National Commission on Fire Prevention and Control) and to develop recommendations to reduce further the loss of life and property due to fire. A follow-up commission formed in 1999, America at Risk: America Burning Recommissioned, echoed many of the same concerns expressed over the preceding decades.

main issue assigned to the task force, and despite the fact that the committee’s “critical issues” so closely related to the scope of services provided by the interior design profession. Perhaps more marked is the absence of any design field involvement – interior design or architecture – in America at Risk: America Burning Recommissioned, the 2002 conference and study intended as a follow-up and update to issues and recommendations developed during the 1987 America Burning Revisited workshop. Rather, committee members and panelists were from the fields of fire protection, code administration, fire and emergency service, insurance, fire research, legislative and governmental affairs, and other government agencies. The reports of each successive task force focused on the progress made in the building and fire codes, illustrating a common emphasis on fire suppression and response rather than on comprehensive preventative measures that is prevalent in the United States. Fire- and life safety-codes have evolved to acknowledge the impact of automatic fire suppression systems – sprinklers – in buildings. Certain high-risk occupancies are required to include automatic sprinkler systems under current code for new construction; some are even required to have sprinkler systems installed in existing facilities as a result of fatal fire incidents. Such is the case with a rule enacted by the Centers for Medicare and Medicaid Services (CFS), the federal agency that contracts with states to make sure nursing homes comply with federal standards. The rule will require all existing nursing homes in the

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United States to install automatic fire sprinklers by August 2013, without waivers or exceptions, if they wish to continue to qualify for participation in the Medicare/Medicaid reimbursement program. The requirement is a direct result of two deadly nursing home fires that occurred in 2003, the Greenwood Health Center in Hartford, Connecticut that killed sixteen residents, and the NHC Healthcare Center in Nashville, Tennessee that killed fifteen.

Undoubtedly, such emphasis on automated sprinkler systems saves lives. However, successful fire protection is based on a balanced, redundant system that allows for failure of any one of the multiple approaches. The present trend toward lessening passive fire safety restrictions in buildings with sprinklers may point to a dangerous overreliance on automatic fire suppression systems. For example, even as most current codes have evolved to allow an extension of maximum travel distances in many occupancy types when a building is fitted with an automatic sprinkler system, there are consistent issues with potentially faulty or untested system components, evidenced by a 2001 recall of 35 million potentially faulty sprinkler heads. Similarly, the fact that there have been thousands of seizures of products bearing counterfeit UL Marks at United States entry ports from coast to coast including fire sprinkler heads and

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13 Ibid.


other components such as those that resulted in the public notice of counterfeit product in June 2012 disseminated to distributors, fire departments, regulatory agencies and other authorities.\textsuperscript{16} In addition, first responders are facing the same economic challenges as are most other public and private service providers, potentially reducing the response time and/or adequacy of response (human power and equipment) under emergency conditions. In a 2012 survey of the 200 most populous cities in the United States by the \textit{Journal of Emergency Medical Services}, 37.8 percent of respondents confirmed that they have had service reductions in the past year due to economic pressures, and 35.5 percent were certain that they would experience service reductions in the next twelve months.\textsuperscript{17}

A large part of redundant fire protection systems is the passive system of the interior finish, contents, and furnishings.\textsuperscript{18} In its introduction to “Chapter 10, Interior Finish, Contents, and Furnishings,” the NFPA writes:

“Historically, many fire fatalities have been attributed to the quick spread of fire. Often the fire spread occurs along the


\textsuperscript{18} National Fire Protection Association, \textit{NFPA Glossary of Terms 2012 Edition.} (Quincy, MA: Author, 2012), 1042. The NFPA considers any portion of a building or structure that provides protection from fire or smoke without any type of system activation or movement to be a \textit{Passive Fire Protection System}. 

81 Chapter Two
expanses of exposed wall and ceiling coverings and via the contents of the building….The concept behind the requirements is to slow the flame spread across these finish surfaces to allow additional time for occupants to relocate within, or evacuate from, a building. The fire characteristics of interior finish can play a dramatic role in life safety when a fire occurs….The faster a fire develops, the greater the threat it represents to the occupants of a building and the more difficult it will be to control. Wall and ceiling surfaces of a building have a major influence on how fast a fire develops.\footnote{Ron Coté and Gregory E. Harrington, \textit{Life Safety Code Handbook}, ninth edition (Quincy, MA: National Fire Protection Association, 2003), 319-21.}

As one might imagine, interior finishes, furnishings, and content, especially in high-risk occupancies that carry special dangers to the occupants during an emergency. According to the NFPA, interior finishes and furnishings in public assembly spaces have more impact on the protection of life and property than any other issue except the actual fire ignition source itself.\footnote{National Fire Protection Association, \textit{Fire Safety in Assembly Occupancies: Information About Assembly Occupancies}, 2013, accessed June 15, 2013, http://www.nfpa.org/itemdetail.asp?categoryid=850&itemid=21084&url=safety%20information/for%20consumers/occupancies/nightclubs/assembly%20occupancies/fire%20safety%20in%20assembly%20occupancies. On this same document, the NFPA defines an assembly occupancy as ‘‘an occupancy (1) used for a gathering of 50 or more persons for deliberation, worship, entertainment, eating, drinking, amusement, awaiting transportation, or similar uses; or (2) used as a special amusement building, regardless of occupant load.’ Assembly occupancies might include the following: armories, assembly halls, auditoriums, club rooms, dance halls, drinking establishments and exhibition halls among others.} In an informational piece produced for consumers about fire safety in assembly occupancies such as nightclubs and other assembly spaces, the NFPA asserts, “The following elements provide an outline of the most basic requirements and criteria as found in NFPA 101\textsuperscript{®}, Life Safety Code\textsuperscript{®}, 2000 edition. The
order in which they are presented … is indicative of how they lessen a life threatening condition.\textsuperscript{21} The document goes on to list:

1. "Ignition sources" that include fires caused by so-called "controlled" sources such as alcohol or solid alcohol products in restaurants, flames used for dramatic effects, and other unintentional ignition sources such as pyrotechnics, open flame devices, including cooking and heating equipment and facilities;

2. "Furnishings & contents" including exposed surfaces of walls, ceilings, and floors within buildings, decorations and panels, even if on a temporary basis, and furnishings, the contents of spaces such as desks, chairs, tables, sofas, draperies, and rugs;\textsuperscript{22}

3. "On-site fire protection" including fire alarm systems, automatic sprinkler systems, and portable fire extinguishers; and

4. "Exiting" including occupant load, number and arrangements of exits, exit signs, emergency lighting, and signage indicating maximum occupant load.\textsuperscript{23}

The NFPA publishes similar findings for health care occupancies. As one might imagine, however, since health care occupancies have different issues, primarily

\textsuperscript{21} Ibid.

\textsuperscript{22} Although listed as "furnishings and contents," the referenced document does not define the term furnishings in as much detail as it defines the other categories listed. The author has included for clarification purposes the formal NFPA definition for "contents and furnishings" (NFPA 101, 2012) from National Fire Protection Association, \textit{NFPA Glossary of Terms 2012 Edition}, 642.

\textsuperscript{23} National Fire Protection Association, \textit{Fire Safety in Assembly Occupancies: Information About Assembly Occupancies}. 83 Chapter Two
concerns regarding the protection of non-ambulatory occupants, the list of critical factors in lessening a life threatening condition changes in content and listing order. As in the assembly occupancy piece examined above, the NFPA directs the information toward consumers. “The following elements provide an outline of the most basic requirements and criteria as found in NFPA 101®, Life Safety Code®, 2003 edition.”

The order of the listing includes:

1. “Compartmentation” that includes barriers such as walls, smoke barriers, partitions, and floors, and separate building spaces that delay or prevent fire and smoke from spreading from one compartment to another;
2. “On-site fire protection” including fire alarm systems, automatic sprinkler systems, and portable fire extinguishers;
3. “Exiting” including occupant load, number and arrangements of exits, exit signs, emergency lighting. This category also includes exiting strategy and relocation. Unlike other types of occupancies, movement and evacuation of all patients is not practical and is reserved as a measure of last resort. It is often preferable to transport patients to a separate compartment;

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24 National Fire Protection Association, *Info on Health Care Occupancies*, 2013, accessed June 15, 2013, http://www.nfpa.org/itemdetail.asp?categoryid=792&itemid=20722&url=safety%20information/for%20consumers/occupancies/nursing%20homes/info%20on%20health%20care%20occupancies. On this same document, the NFPA defines a health care occupancy as “an occupancy used for purposes of medical or other treatment or care of four or more persons where such occupants are mostly incapable of self-preservation due to age, physical or mental disability, or because of security measures not under the occupants’ control. Health care occupancies might include the following: hospitals, limited care facilities, and nursing homes among others.”
(4) “Staff training” including training and maintenance of training related to
"defend-in-place" responses such as alarm sounding, rescue of patients (as
needed), closing of doors to ensure compartmentation; and

(5) “Furnishings & contents including exposed surfaces of walls, ceilings, and
floors within buildings, decorations and panels, even if on a temporary basis,
and furnishings, the contents of spaces such as desks, chairs, tables, sofas,
draperies, and rugs.\textsuperscript{25}

It is important to note that, just as was the case with the United States Fire
Administration (USFA) and Federal Emergency Management Agency (FEMA)
commissions on the fire problem, few interior design professionals are engaged with the
process of code development and/or research. Certainly the interior design profession is
viewed as incidental at best, perhaps secondary to the architectural and engineering
professions. A case in point; as a benefit of membership, NFPA members may join one
or more of thirteen industry-specific Member Sections that offer the to enhance
understanding among professionals. The Architects, Engineers, and Building Officials
(AEBO), one such Member Section, was organized in 1979 and is “open to all NFPA
members who are registered architects and registered professional engineers
principally engaged in building design, their designated employees, and building officials

\textsuperscript{25} National Fire Protection Association, \textit{Info on Health Care Occupancies}. Although listed as
“furnishings and contents,” the referenced document does not define the term furnishings in as much
detail as it defines the other categories listed. The author has included for clarification purposes the
formal NFPA definition for “contents and furnishings” (NFPA 101, 2012) from National Fire Protection
engaged in the administration of building codes and regulations.”

Although the Section offers “affiliate membership” to all NFPA members who have “interest” in the building design and construction code regulation process, membership by those other than licensed architects or engineers, seems likely to be subjugated to the registrants in title and reference if not in action. It also seems likely that the interior design profession is failing to effectively interject its voice – and its specialized expertise – into these various conversations so relevant to its practice.

The question, then, is why? If, as Abbott, Freidson, and others (Guerin & Martin, Khurana et al., and Martin) suggest, professions are distinguished from other practitioners by their role as protectors of the public, manifested in the safeguarding of life, health, and/or welfare, why are interior designers not readily recognized for their unique role in the protection of the public in interior environments? If, as Torres suggests, the creation and perpetuation of professionalism is dependent on the

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perception that professional tasks are critical to societal welfare, why is the message of interior designers missing its mark? 30

**Impediments to Jurisdictional Claim**

The answer, of course, is a complicated one. Complicated by political, social, economic, and cultural issues from within the profession and from without. In the most basic view, the interior design profession has simply not succeeded in making an effective public claim to its jurisdiction, the protection of the health, safety, and welfare of the public in interior environments. The failure is not for lack of effort, for the interior design profession has made great strides in defining itself and its specialized expertise, in documenting and disseminating the interior design body of knowledge, and in linking specialized tasks and research outcomes to the expertise of the profession. Rather, the obstacle appears to be a failure to articulate and communicate its definition and specialized expertise in concrete, observable, demonstrable terms that take into consideration marketplace culture: the behavior, delivery systems, vernacular language, and values of its various audiences. In short, it seems to be a failure to recognize an existing and distinct cultural gap between interior design and the generative professions that surround it; a cultural gap that impacts the ability of the interior design profession to communicate adequately and properly to its audience(s); a cultural gap that permits –

even promotes – misperceptions or misinterpretations of its value. To better understand the cultural gap, an evaluation of common misconceptions is necessary.

The general public assumes that, based on current legal, regulatory, and oversight systems in place, it is reasonably assured that its health, safety, and welfare is protected. This is evident in the trust the public has in our food and health care supply systems and in consumer and transportation products. The public has come to expect that, through various laws, ordinances, codes, professional licensure, and other forms of regulatory oversight, the products and services it consumes or on which it relies are provided in such a way as to guard the public against harm.

Similar beliefs are held regarding the design professions and the safety of the built environment. The public presumes that through the professional licensure for specific types of designers and the regulatory review for code compliance by building codes and fire officials, the buildings in which it lives, works, and plays are appropriately designed and constructed with regard to health, safety, and welfare. In the absence of regulation, the public believes that either 1) regulation is not required because there is little or no risk of harm or 2) that the risk of harm has been mitigated in some other way. More specifically, the practice of interior design, where it is not regulated, is presumed to not impact the public health, safety, and welfare because interior design services are of an aesthetic nature only, or because the aspects of interior design which might precipitate harm are being adequately overseen by other qualified persons, i.e., code and fire safety officials, architects, or engineers.
These misconceptions are not unique to the public. They are also common among allied professionals (e.g., architects, engineers, interior decorators), often driven by lack of knowledge, perspective, institutionalized beliefs, and protectionist motives.

**Cultural and Informational Gap**

An examination of the data and method behind successful regulation of other allied design professionals – architects, engineers, and landscape architects – to date the most outspoken of challengers to the interior design profession’s jurisdictional claims, is insightful. Specifically, landscape architects, whose legislative initiatives for professional recognition are not only contemporary with those of the interior designers, but whose initiatives have also been much more successful than those of the interior design profession. California was the first state to regulate minimum competence for practice of landscape architecture, in 1953. In 2006, just fifty-three years later, forty-six states and jurisdictions had some statutory authority to regulate the practice of landscape architecture and the profession was in the process of working to modify existing title regulation in sixteen others to expand protections to regulate the practice of landscape architecture.\(^\text{31}\)

Like interior design, the practice of landscape architecture is intricately linked with the allied design and construction professions of architecture and engineering,

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\(^{31}\) “Title regulation” restricts the use of a specified title identified in the regulation to only those practitioners who have been qualified by the state. Practice and standards for practice may only be regulated in most jurisdictions through “practice regulation” that, in addition to restriction of title, confines practice of the profession to only those individuals determined by the state to have met minimal professional competency. At the beginning of 2000, 30 states regulated the practice of architecture, 16 states regulated the profession with title regulation only, and four states had no regulation at all.
replete with overlapping technical competencies as well as unique specialized knowledge and technical skills. And, like interior design, the success of efforts to earn professional recognition and obtain practice regulation hinged on the effective presentation of evidence that the regulation is necessary to protect public safety and prevent irreparable harm.

A key element in the articulation of the landscape architecture profession’s argument was a 2003 study by Alex Schatz, J.D., produced for the American Society of Landscape Architects as a part of the successful 50 by 2010 Licensure Campaign. The study represents the nature and type of data, the structure and methodology of the assemblage, and the tenor and tone of the communication that the interior design argument has lacked to date, and offers a way to move beyond a collection of wide ranging research and seemingly anecdotal evidence to a comprehensive approach to the potential for harm. Schatz writes:

…reviews of the profession have highlighted the need for a comprehensive presentation of the evidence related to the potential for harm in landscape architecture practice.

…This report specifically focuses on many representative incidents of injury that could have been prevented through competent landscape architectural practice. Because the approach taken is empirical, presenting dozens of actual

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32 American Society of Landscape Architects, News: 50 Means 50: Licensure Reaches Milestone in Vermont (April 26, 2010), accessed April 11, 2013, http://www.asla.org/NewsListingDetails.aspx?id=26784. Although one can’t underestimate the impact of hard work and concentrated efforts of both association staff and dedicated volunteers on the ground in each state, it would seem reasonable to assume that the significant legislative gains made from the document’s publication in 2003 to date – practice legislation in the last three unregulated states and successful transition to practice act from title act in all but three states, not to mention its impact in sunset review cases, is due in part to the effective evidence produced by Schatz.
cases in many areas of landscape architecture practice to establish the reality of the potential for harm, this report does not rely on an extensive description of the scope of landscape architecture to imply that there is a potential for harm. Where past discussions of the potential for harm may have required a technical understanding of the profession, this report provides concrete evidence that defective design and inadequate supervision of landscape architectural work has the potential to cause, and, in fact, has caused, serious, irreparable harm.\textsuperscript{33}

Schatz’s methodology provided a solid factual basis for the regulation of landscape architecture. It compiled data that made a clear case for landscape architecture regulation. Fundamental to that case was the supporting evidence of the potential for harm. “Translating the scope of landscape architecture into actual cases, this … demonstrates the logical result of a profession where there is a significant potential for harm: Incompetence, negligence, and unethical practices have serious consequences.”\textsuperscript{34}

Perhaps more importantly, Schatz’s study does not rely on the audience (listener/reader) to have any special knowledge or experience with the discipline or practice of landscape architecture. Instead, the study is couched in the professional vernacular of the existing field, familiar to architectural practitioners and codes officials. Rather than a barrage of information that covers a host of benefits of landscape architecture, it focuses on a singular notion: a pattern of harm, which is the only


\textsuperscript{34} Ibid., 16.
measure of importance when considering public health, safety, and welfare. It utilizes sources for information that are reliable and recognizable to its audience. It presents the material logically, sequentially, and realistically. It presents factually information that was previously treated hypothetically or anecdotally, allowing the audience to apply its own professional prowess in its assessment. Such a study may be classified as a biased, male-gendered approach. Factually speaking, it is, without judgment, a necessary part of the contemporary male-dominated professional vernacular within the architectural design and construction professions.

It would seem then, that the interior design profession could follow the model developed for the Schatz study. However, construction of an argument for interior design regulation based this model is not possible. The reasons behind this impossibility are perhaps the very reasons why it has been difficult for the interior design profession to make a compelling case for harm, and why it has been unable to convincingly and once and for all refute claims by opponents to interior design regulation that the practice of interior design does not impact public health, safety, and welfare. In fact, the inability of the interior design profession to produce such a study thus far has served to fortify the claims of its opposition. Claims such as, “Not a shred of evidence has ever been presented to support a conclusion that the unregulated practice of interior design places the public in any form of jeopardy whatsoever,” made by a spokesperson for an interior decoration-based coalition opposed to interior design regulation.\footnote{Patti Morrow, “Anti-licensing: Insurgence of the Independents,” Window Fashions Vision (Nov 2008), 21, accessed June 16, 2013, http://www.idpcinfo.org/Insurgence_of_the_Independents.pdf} Or, claims like the
one discussed in Chapter One, “...while bad taste might be offensive, there is no evidence that anyone has been killed by a bad color scheme,” by a president of the National Council of Architectural Registration Boards (NCARB) in an address framing NCARB’s position on the subject of interior design regulation.36

Despite the condescending nature and demagogic tone inherent in each message, the leadership of the allied professions has a point. There has been little evidence presented to date – at least traditional legal evidence – that unqualified practitioners of interior design have harmed the public. The fact of the matter is that the legal cases sought simply do not exist. For clarity, it is not that the evidence does not exist. It is that the form of evidence does not exist. Moreover, the gap in traditional legal evidence is due to the unique nature of interior design practice itself. When one begins to identify behaviors of the marketplace in which interior design services are provided and interior design content is selected, specified, and installed, it becomes clear that behavioral norms or customs of interior design practice prevent the collection and dissemination of the type of legally based evidence sought.

First and foremost, litigation against interior design practitioners is often too expensive. The relative cost of claims associated with interior design projects in comparison with the cost of claims for architecture, landscape architecture, and engineering projects, increases dramatically the likelihood that claims will be resolved.

without formal judicial action. Simply stated, it is typically cheaper to settle a claim than to litigate it. Thus, litigation against interior design practitioners is rare.

Consequently then, litigated cases against interior design practitioners are a poor indicator of the potential for harm. Not only are cases exceptionally infrequent, as noted above, they also represent only a fraction the number of incidents of harm caused by negligence. Even if claims are filed, most claims are resolved without formal judicial action. Records for United States District Courts indicate that in 2012, the most recent data available, slightly less than nineteen percent of federal court cases, 43,115 of 229,987 cases, were acted upon by the courts. Ninety-nine percent of 2012 federal court cases, or 227,203 of 229,987 total cases, failed to reach trial.\(^{37}\) Moreover, an even smaller fraction of cases are reported through an electronic database or published trial court reports, the primary source of legal case data. Of the fractional cases that go to trial, only a small additional portion are appealed to a level where the case is likely to be published or reported.\(^{38}\) When one considers the initial bias against litigation in claims of interior design harm, it is no wonder that a cursory search for legal cases yields nothing.

But what of other types of formal claims, especially claims unique to the interior design profession?


• Cases settled through mediation, arbitration, or other non-judicial methods are not a matter of public record, and are difficult to track. Often the agreements include privacy and other clauses that restrict parties to the agreement from revealing details of the case or terms of settlement. Even those with personal experience in forensic design negligence cases may share information about projects and circumstances only in the abstract, leaving out the concrete and demonstrable details necessary to move the evidence from the theoretical to the tangible, the anecdotal to the actual.

• The availability of data on cases filed with professional liability insurers yields little accurate information for many reasons. Not only have liability policies and thus tracking of case data been available for interior designers for a relatively short period of time compared with those of architects and engineers, but also the availability of liability coverage is often predicated upon the regulation of the particular profession. For example, if a state does not recognize interior design practitioners as “design professionals,” they may not qualify for traditional liability insurance coverage. As a result, few insurers have significant and consistent historical data on the interior design profession. It bears noting that a unique link exists between professional liability insurance and legal action that likely further reduces the number of legal actions taken against interior designers. Without the financial backing provided by a professional liability insurer, that is, the assurance of monetary resources
to pay a potential claim, it is even less likely that a claimant will pursue expensive litigation. Therefore, tracking cases of harm involving the unregulated practice of interior design, in the absence of professional liability claim history is, again, problematic.

- Manufacturers and installers of interior space content products may play a significant role in assisting their clients/customers in settling claims “off line” in the interest of maintaining valuable business relationships. Records of such settlements would be private, if not proprietary, and are certainly difficult to examine in any collective or comparative fashion.

- Few states license and regulate the practice of interior design. Consequently, there is little data tracking the types or bases of complaints against unregulated interior designers. In states that regulate the use of a restricted title such as ‘registered interior designer” or “certified interior designer” without regulating the practice itself – which constitutes a majority of existing regulation in the United States – oversight is restricted to practitioners who voluntarily participate in the registration. Regulating bodies or registration boards are limited, if not restricted, to governance of

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the registrants only. Consequently, agencies have no means or method to
hear complaints or collect data on such complaints regarding those
practicing interior design under an unrestricted title. In states with title
regulation, more often than not, complaints and penalties are related to
“holding out” infractions, where individuals “hold themselves out” to the
public or solicit business as a registrant without being qualified by the
state to do so.

- Regulatory authorities, including professional registration boards, do not
  necessarily become involved with formal claim procedures beyond those
  that affect its own body, mission, and opinion. Therefore, reliable,
  consistent tracking information is absent.

In order to make a strong and effective claim on the jurisdiction of health, safety,
and welfare of the public in the interior environment, the interior design profession must
explore alternative sources of data that serve as a clear indicator of the potential harm
within the practice. Although the source of the data will vary from the Schatz study
model, the substance and form of the interior design study should closely correspond
with its intent: to focus on identifying a pattern of potential harm, use irreproachable
sources of information that are familiar, indeed customary, within the architectural
practice domain, and present the material logically and sequentially, permitting – even
challenging – the audience to apply its own professional expertise in its assessment.

In a parallel realm of business and marketing strategy, Schatz’s study
approaches the definition of a clear and well-articulated value proposition. As Lanning
suggests (see Chapter One) the benefits offered by landscape architecture are explicit, specific, and the value of landscape architecture in direct relation to the cost – or risk of harm to the public – is defined. The value proposition is supported by evidence of adequate demand; Schatz proves that the public is harmed when landscape architects are not regulated and that no other professions have the unique qualifications to mitigate the risk. This study anticipates answering these questions with respect to the interior design profession, in addition to a third component of Lanning’s value proposition, that is, is the value proposition achievable in light of the current business delivery system, the market for interior design services?

Introduction of Study

For the purposes of this investigation, this study is divided into three distinct parts, each addressing a separate, but related question and operational hypothesis centered around the three most common cultural misperceptions of the interior design profession. Each distinct part employs various methodologies as appropriate for the research question at hand; each will be discussed at length below. The overarching intentions of the study are to use a combination of quantitative and qualitative research methods and a variety of alternative, secondary data sources to 1) discover the existence and degree of harm or the potential for harm to the public by unqualified interior design practitioners or by the provision of interior space content typically provided as part of a scope of interior design services; 2) validate and correlate previous research findings; and 3) provide a review of the findings and possible
implications for the individuals involved and society in general. Quantitative methods primarily include the correlation of secondary data using cross-tabulation to analyze the relationship between multiple variables. Qualitative analysis methods include inductive analysis and creative synthesis of case studies, investigative and other reports, and quantitative data, statistics and/or results, and is descriptive and explanatory in nature with a focus on understanding the implications of the data examined. The use of secondary sources in this study is not merely a means to create a historical record, but rather to combine a series of occurrences into a collective, original whole.

This study builds substantially on a previous work designed by the author in 2010. As will be detailed for each research section below, those parts of the work that are incorporated from the preceding work will be clearly identified and will be compared with updated information and/or will be expanded in scope; the intention is to validate the initial study and methodology and determine whether the initial findings indicate a pattern or trend rather than an isolated finding.

The attitude and voice of the author is understandably key for the reliability and validity of any study. Although one might wish to maintain a purely objective stance in the execution of research, the very nature of qualitative and reflective investigation complicates that goal. Whereas absolute objectivity is impossible to attain and total subjectivity is not advocated for obvious reasons of bias, authentic neutrality is the

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recommended goal.\textsuperscript{41} The author has made significant efforts to be self-analytical and reflexive in consciousness in an attempt to recognize and neutralize personal and experiential bias.

\textit{Limitations and Delimitations}

This study is not intended to be an exhaustive accounting of proof of harm. As a result, it is focused on a very small but significant aspect of harm. That is: fire- and life-safety in public and high-risk occupancies. This study focuses on spaces used by the public, but spaces in which the public has had no say in the design decisions and/or spaces that, because of their unique use or structure, pose a special risk to their occupants. For example, this would include spaces in high-rise buildings that exceed the height of fire fighter ladders or private skilled nursing care facilities that house non-ambulatory or easily confused patients.

Many study definitions and much of the initial data examined in Part 1, detailed below, and outlined in the introductory section \textit{Seriousness of the Fire Problem} above are tied to a single, well-respected source, the National Fire Protection Association (NFPA). Not only is it the leading authority on public health and safety with regard to the effects of fire and other hazards, but it is also the singular source of comprehensive fire data in the United States. The NFPA also serves as a repository for detailed fire statistics and investigations dating back to the 1930s. Investigation documentation

includes details of fire ignition, growth and development, contributions of building
construction as well as interior finishes and furnishings, and comprehensive data on
extent of life loss, injury and property damage. In terms of the architectural and
engineering vernacular, the NFPA is beyond reproach. Architects and engineers,
interior designers, contractors and building tradespeople, product manufacturers, fire
marshals and codes officials – nearly everyone in the construction industry – recognizes
and respects the organization and its research-based methodologies. The organization
was responsible for developing and publishing some of the earliest consensus-based
building codes and standards in the United States and has for more than 80 years
published the *Life Safety Code*, one of the most widely used code sources for the
protection of the public.\(^{42}\) Virtually every building, construction, and installation is
affected by NFPA codes and standards. Most notably, the very basis for the
development and adoption of NFPA codes is the careful documentation and analysis of
significant fire incidents. In addition, the wealth of NFPA fire-related research is readily
available, making verification and substantiation straightforward.

Further, as will be detailed in each research part below, the author has restricted
the cases and data reviewed to a defined, contemporary timeframe. To make the work
easily verifiable, the study is limited to only those cases and other data that are
published online through the NFPA (and therefore are readily available to others). In

addition, where personal and/or professional judgment is necessary in the interpretation of the data, measures will be taken to ensure the most conservative reading.

This study is *not* an endorsement of any regulatory actions or initiatives. It will not prescribe any particular solution or outcome. Instead, this study is an exploration of issues and options.

This study is not a definitive work, but rather a beginning. It aims to provide a concise, well-reasoned launching point for discussion and further research.

*Study Definitions*

For the purposes of this examination, unless noted otherwise, key definitions utilized in this work include the following:

**Safety as Related to Interior Design Practice**: Interior designers create interior environments that protect people against actual or perceived danger; protect against risk from crime, accidents, or physical hazards; prevent injury, loss, or death that could be caused by occupancy of interior environments.\(^{43}\)

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**Interior Space Content**: Interior space content includes the selection, specification, arrangement, and/or installation of interior finish materials and interior space content such as furniture, fixtures, and equipment provided as part of a scope of interior design services defined by Council for Interior Design Qualification (CIDQ) in 2004 (pp. 1-2), accepted in current title and practice legislation and included in model legislative language published by CIDQ in *Core Provisions of Interior Design Registration: Model Legislation, January 2010* (p. 1).

**Public and High-risk Occupancies**: Occupancies to which the public has access as passive users – they have had no input in space design decisions – and/or spaces that carry special risk to the occupants during an emergency, and are, therefore, subject to stricter code requirement and enforcement standards. Specific occupancies in this compilation include those for assembly, residential board and care, business, healthcare, high-rise, hotels/motels/dormitories, lodging/rooming house, mercantile, and multifamily housing including apartments and condominiums. The definitions of each of these occupancy types are detailed below.

**Occupancy/Occupancy Type**: The purpose for which a building or other structure, or part thereof, is used or intended to be used.\(^{44}\)

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Assembly Occupancy: An occupancy (1) used for a gathering of 50 or more persons for deliberation, worship, entertainment, eating, drinking, amusement, awaiting transportation, or similar uses; or (2) used as a special amusement building, regardless of occupant load. Assembly occupancies might include the following: armories, assembly halls, auditoriums, club rooms, dance halls, drinking establishments and exhibition halls among others.\textsuperscript{45}

Residential Board and Care Occupancy: An occupancy used for lodging and boarding of four or more residents, not related by blood or marriage to the owners or operators, for the purpose of providing personal care services.\textsuperscript{46}

Business Occupancy: An occupancy used for the transaction of business other than mercantile.\textsuperscript{47}

Health Care Occupancy: An occupancy used to provide medical or other treatment or care simultaneously to four or more patients on an inpatient basis, where such patients are mostly incapable of self-preservation due to age, physical or mental disability, or because of security measures not under the occupants' control.\textsuperscript{48}

\textsuperscript{45} National Fire Protection Association, \textit{Fire Safety in Assembly Occupancies: Information About Assembly Occupancies}.


\textsuperscript{47} Ibid., 123.

\textsuperscript{48} Ibid., 699.
High-rise Building: A building where the floor of an occupiable story is greater than seventy-five feet (twenty-three meters) above the lowest level of fire department vehicle access.\textsuperscript{49}

Hotel/Motel: A building or groups of buildings under the same management in which there are sleeping accommodations for more than 16 persons and primarily used by transients for lodging with or without meals.\textsuperscript{50}

Dormitory: A building or a space in a building in which group sleeping accommodations are provided for more than 16 persons who are not members of the same family, in one room, or a series of closely associated rooms, under joint occupancy and single management, with or without meals, but without individual cooking facilities.\textsuperscript{51}

Lodging or Rooming House: A building or portion thereof that does not qualify as a one-or two-family dwelling, that provides sleeping accommodations for a total of 16 or fewer people on a transient or permanent basis, without personal care services, with or without meals, but without separate cooking facilities for individual occupants.\textsuperscript{52}

\textsuperscript{49} Ibid., 716.
\textsuperscript{50} Ibid., 729.
\textsuperscript{51} Ibid., 372
\textsuperscript{52} Ibid., 849.
**Mercantile Occupancy:** An occupancy used for the display and sale of merchandise.\(^{53}\)

**Multifamily Dwelling:** A building that contains three or more dwelling units, including apartments and condominiums.\(^{54}\)

**Apartment Building and/or Condominium:** A building or a portion thereof containing three or more dwelling units with independent cooking and bathroom facilities.\(^{55}\)

**Educational Facility:** An occupancy used for preschool, primary, and secondary educational purposes, and including adult education or college classrooms by six or more persons for four or more hours per day or more than twelve hours per week.\(^{56}\)

**Nursing Home:** A building or portion of a building used on a twenty-four-hour basis for the housing and nursing care of four or more persons who, because of mental or physical incapacity might be unable to provide for their own needs and safety without the assistance of another person.

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\(^{53}\) Ibid., 912.

\(^{54}\) Ibid., 936.

\(^{55}\) Ibid., 45.

Part 1 | Evidence of Harm | The Implication of Interior Content

The work in this research part serves as the underlying foundation for the two investigative parts which follow and is intended to examine the evidence of the existence of harm or the potential of harm to the public caused by interior space content that is typically included as part of a scope of interior design services. The fundamental research question and operational hypothesis are:

• Research Question:
  Is there a risk of harm to the public that can be linked directly to the interior design profession?

• Operational Hypothesis:
  A significant risk of harm stems from the interior space content in public and high-risk occupancies.

The work of this section is conducted by the investigation of two types of data: 1) case study identification and examination, and 2) analysis of NFPA annualized fire data.

Case Study Identification and Examination

An examination will be made from fire investigation reports published by the NFPA Fire Investigations division, the arm of the NFPA that conducts on-site investigation, analyzes, and reports detailed fire experience data for fires that hold significant technical or educational significance. Areas documented during the course of the investigations include:
details of fire ignition, growth, and development; contributions of building construction, interior finish and furnishings; fire detection and suppression scenarios; performance of structures exposed to the fire; smoke movement and control; human reaction (response) and evacuation; fire fighting and rescue; fire propagation as a function of human reaction time; the extent of life loss, injury and property damage.\footnote{National Fire Protection Association, \textit{Research: Fire Investigations}, 2013, accessed June 18, 2013, \url{http://www.nfpa.org/categoryList.asp?categoryID=241}.}

In the interest of evaluating current and relevant information, only fire investigations from the last forty years, 1973 to 2013, will be examined. To ensure study reliability the study survey range includes all fire investigations published by the NFPA on their website under the “research” tab. Further, to evaluate only fire investigations related to incidents in public and high-risk public occupancies, only publications classified as follows will be included in the survey:

- “Assembly” occupancies
  - Mercantile (11 investigation reports)
  - Nightclubs (5 investigation reports)
  - Restaurants (3 investigation reports)
  - Schools (1 investigation report)
  - Churches (2 investigation reports)
  - Stadiums (3 investigation reports)
  - Amusement parks (1 investigation reports)
  - Libraries (1 investigation reports)
• “Health care” occupancies
  o Board and care (13 investigation reports)
  o Hospitals (8 investigation reports)
  o Nursing homes (9 investigation reports)

• “Non-residential properties”
  o High-rise (5 investigation reports)
  o Office and Miscellaneous (7 investigation reports)
  o Study excludes investigation reports for industrial and storage
    properties listed under this category

• “Residential” occupancies
  o Apartments (9 investigation reports)
  o Dormitories (5 investigation reports)
  o Hotel/Motel (33 investigation reports)
  o Lodging/Rooming House (5 investigation reports)
  o Study excludes single- and two-family residences listed under this
    category

In addition, where referenced and/or appended to the NFPA fire investigation
reports, the research will review additional reports and/or NFPA Fire Journal articles
that provide additional information on the fire incident. For a complete listing of the fire
incidents to be examined, see Appendix A.

In the author’s 2010 study, a similar examination of NFPA fire investigation
reports yielded a list of twenty-seven fires in which one or more aspects of interior
finishes, furnishings, arrangement of furniture, and other aspects of interior space content are specifically identified as a significant contributing factor in the loss of life and property. A reexamination of all fire investigation reports will be conducted 1) to validate the data collected in the 2010 study, 2) to determine if additional fire incidents should have been included, especially incidents occurring since the original study, and 3) to document the interior space content issue or issues related to the claim (not included as part of the original 2010 study).

Analysis of NFPA Annualized Data

NFPA annualized fire data by specific occupancy types for the most recent period available will be examined and analyzed. NFPA annual averages are national estimates of fires based on historic data reported to United States municipal fire departments during the period identified. Data provided in the annual estimates includes number of total fire incidents organized by occupancy type, number of civilian deaths, injuries, and totals of direct property damage. In addition, the data includes items first ignited, as well as the extent of flame damage to object, area, floor, and building from the fire incident/ignition origin.

The data will be examined using primarily cross-tabulation analysis to study the relationship between the multiple variables and multiple occupancy types.

Author’s note: Where personal and/or professional judgment on the part of the author was necessary in the interpretation of the data, particularly with respect to the naming of significant contributing factors in the loss of life and property, the author opted for the most conservative option, identifying only fire incidents that were unquestionably clear in the implication of interior space content as a contributor to loss.
In the author’s 2010 study, a similar examination of NFPA annualized data was performed for the four-year period of 1999-2002. By comparing the most recent data available to the work from the 2010 study, the author will attempt to 1) to validate the data collected in the 2010 study, and 2) determine if a pattern of harm from interior space content is observable. 59

Part 2 | (Mis)Alignment of Mitigation | The Current Interior Design Content Delivery System

This part of the study is intended to consider the current and customary delivery system for interior space content in light of the potential harm evidenced in Part 1 in order to look critically at the match between the safeguards provided within the building, fire and life-safety codes, licensing laws, and other regulations piloting such work. This part of the study will include a review of primary and secondary data sources that detail typical regulatory paths and requirements for new construction, significant renovation, and other incremental change. The fundamental research question and operational hypothesis for this portion of the work are as follows:

59 Author’s note: Where personal and/or professional judgment on the part of the author was necessary in the interpretation of the data, particularly with respect to the identifying which items, from the list of items first ignited tracked in the NFPA data are items that fall within the accepted definition and scope of interior design services, the author opted for the most conservative assessment.
• Research Question:
  Does the structure of our existing system of life-and fire-safety codes and the
  requirement for licensing of architects and engineers as overseers of
  construction mitigate the risk to the public?

• Operational Hypothesis:
  Current licensure and regulatory norms do not sufficiently manage or abate risk
  in public and high-risk occupancies.

  Using inductive analysis, the author will examine process documents and
available instructions, guidelines, and permitting and licensing requirements from
representative regional building code jurisdictions to examine similarities and variations
in protective standards with regard to interior space content and new construction,
significant renovation, and maintenance renovation of interior space. Special attention
will be paid to materials and/or categories of materials that have been identified in Part
1 as significant contributors to the loss of life and property in fire incidents. In addition,
the author will examine existing issues in the delivery of interior design services with
respect to the timing of and the degree of integration with architectural services.

Part 3 | Implications | Interior Design Regulatory and Practice Standards

The third part of the study evaluates the implications for interior space content
delivery systems in light of the findings in Parts 2 and 3. This portion of the study
considers the current status of regulation and practice standards in the interior design
profession in an attempt to identify critical issues that must be dealt with as the role of
interior design practitioners becomes more defined in the realm of health, safety, and welfare. The fundamental research question and operational hypothesis for this portion of the work are as follows:

- **Research Question:**
  Is the interior design profession prepared to share the mantle of public health, safety, and welfare?

- **Operational Hypothesis:**
  Only a portion of the interior design community is qualified to make professional decisions in support of public health, safety, and welfare.

Using inductive analysis, the author will examine the status of current legislative action, professional certification and credentialing systems, and educational accreditation in order to determine its coverage and cachement population. Documents included in this portion of the investigation include summaries of legislative actions and laws of the United States produced and distributed by the American Society of Interior Designers (ASID), the Interior Designers of Canada (IDC) and the International Interior Design Association (IIDA); 2008 *Analysis of the Interior Design Profession* and the resulting minimal competency examination contents conducted by Council for Interior Design Qualification (CIDQ); categorical membership data from ASID, IDC, and IIDA, certification participation data from CIDQ, and the *Professional Standards 2011* and the *Professional Standards 2014* produced by the Council for Interior Design Accreditation (CIDA) for use in setting standards for postsecondary interior design education.
Evidence of Harm | The Implication of Interior Space Content

Case Study Analysis

Since the early 1940s, the fire investigations division of the National Fire Protection Association (NFPA) has collected, analyzed, and prepared detailed fire investigation reports on fires with particular technical or educational significance in the interest of loss prevention. This fire experience data, based on on-site investigations, includes “details of fire ignition, growth, and development; contributions of building construction, interior finish and furnishings; fire detection and suppression scenarios; performance of structures exposed to the fire; smoke movement and control; human reaction (response) and evacuation; fire fighting and rescue; fire propagation as a function of human reaction time; and the extent of life loss, injury and property damage.” It is from this documentation that the impact of interior space content on health, safety, and welfare becomes evident.

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Specific Methodology, Limitations, Delimitations

The current NFPA archive includes 467 investigative reports (in the form of full reports, preliminary/summary reports, and journal articles) analyzing individual fire incidents dating between 1903 and 2006 and seventeen alert bulletins organized around topical issues covering thirty fire incidents between 1987 and 2004. In the interest of public access and research support, the NFPA makes many of these reports available on their website and from the Charles S. Morgan and the Morgan Technical Libraries in Quincy, Massachusetts. As detailed previously in a broad discussion of study methodology, this study is limited to the materials available online from the NFPA website under the “research” tab. Here the reports are categorized into the following comprehensive categories: “Assembly,” “Explosions/Fireworks,” “Firefighter fatalities,” “health care,” “natural disasters,” “non-residential properties,” “residential,” and “transportation.”

From these 497 published and readily available investigative documents, the author examined 134 separate documents specifically related to fires in public and high-risk occupancies, occupancies to which the public has access as passive users – they have had no input in space design decisions – and/or spaces that carry special risk to the occupants during an emergency and, therefore, are subject to stricter code requirement and enforcement standards. Examples include high-rise buildings because

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3 Although 121 total documents are itemized in the various NFPA categorical listings, the NFPA archive occasionally bundles numerous incident reports together. The bibliographic record correctly identifies the 134 separate documents reviewed.
of the complications of rescue in structures where heights exceed that of typical fire department ladder units or the length of time it takes to evacuate non-ambulatory patients in a health care setting. Specific occupancies in this compilation include “Assembly” (mercantile, nightclubs/dance halls, restaurants, schools churches, stadiums, amusement parks, miscellaneous); “Health care” (residential board and care, hospitals, nursing homes); “Non-Residential Properties” (high-rise, miscellaneous business and office); “Residential” (multi-family housing including apartments and condominiums, dormitories and sorority/fraternity houses, hotel/motel, lodging/rooming houses). This study expressly excludes industrial and storage properties listed under “non-residential properties” since there is typically little or no participation of interior design in such occupancies, and also excludes single- and two-family residences listed under the “residential” category since they do not typically meet the definition of a public building with solely passive users. Additionally, for relevance, only fire incidents occurring within the past forty years, from 1973 to 2013, were included.

Findings

An examination of these NFPA investigative reports provides compelling evidence that interior space content is a significant contributor to loss of life and property and corroborates the substantial findings in the 2010 study. The study identifies twenty-eight fires in public and high-risk occupancies that expressly point to one or more aspects of interior finishes, furnishings, and arrangements of furniture as

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4 For a complete list of NFPA fire incidents examined, see Appendix A.
significant contributing factors in the loss of 631 lives and 1,810 injuries (see Figure
3.1). This study adds an additional fire not identified in the initial 2010 study and
modifies the total number of civilian deaths and injuries resulting from these selected
fire incidents.5

It is important to note that, although both substantial and meaningful, the number
of deaths and injuries from this case sampling are not statistically significant; the sample
is based on a random selection of fires the study of which offers lessons for the future
for a host of reasons. Thus, the study findings cannot be generalized to represent the
entire phenomenon. Such issues of probability and causality will be discussed later in
this chapter. Nevertheless, it is clear that this case sampling represents a small number
of total fires in the United States over the forty-year period and thus likely represents a

5 Katherine S. Setser, “Through the Cracks: Failures in the Implementation of Fire and Life
Safety Standards in the Selection, Specification, and Installation of Interior Design Content,” in The State
of the Interior Design Profession, edited by Caren S. Martin and Denise A. Guerin (New York: Fairchild
Bookds, 2010), 253. A closer reading of the fire investigation documentation requires the addition of a
January 1981 hotel fire at the Holiday Inn in Kearney, Nebraska that injured 22 persons to the list of 27
fires identified in the initial 2010 study. The current examination also requires the correction of civilian
deaths and injuries reported during the 2010 study: the First Interstate Bank Building fire, Los Angeles,
CA had 40 civilian injuries in addition to 1 civilian death; there is one additional civilian injury listed for the
Rooming House Fire, Massapequa, NY; the Hotel Fire in Paterson, NJ, October 1984, lists 15 civilian
deaths and fifty civilian injuries rather than the previously recorded 13 and 70; the Central Community
Home fire in Worcester, MA, April 1983, indicated 1 additional civilian injury; the Hotel Fire in Cambridge,
OH, July 1979, lists an additional 82 civilian injuries in association with the incident; and the Hotel Fire in
Greece, NY, November 1978, lists an additional 34 civilian injuries. In addition, a typographic error in the
original 2010 publication inaccurately listed the location of the Stadium Fire in October 1993 as Atlanta,
GA. The fire location is Irving, TX. A similar typographical error mistakenly recorded the October 1984
hotel fire as occurring in Peterson, NJ. The fire happened in Paterson, NJ. Such errors are solely the
fault of the author and do not reflect on the editors, publisher, or others involved in the 2010 study.
Fighting Fire with Fire: Redefining the interior design value proposition

Figure 3.1: Case Study Fires Implicating Interior Space Content as a Contributor to Fire Loss

Design tragedies: proof of interior space content as a contributor to fire loss. NFPA fire investigations indicate interior finish and content are consistent, direct contributors to loss of life and property in these and other fires.

<table>
<thead>
<tr>
<th>Significant Fire Incident</th>
<th>Date of Incident</th>
<th>Civilian Deaths</th>
<th>Civilian Injuries</th>
<th>Primary Interior Issue(s) Cited as Contributing Cause</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Station, West Warwick, RI</td>
<td>Feb 2003</td>
<td>100</td>
<td>200</td>
<td>Highly combustible interior finishes; expanded foam plastic insulation on walls</td>
</tr>
<tr>
<td>Fraternity House Fire, Chapel Hill, NC</td>
<td>May 1996</td>
<td>5</td>
<td>3</td>
<td>Highly combustible interior finishes; extensive use of soft-wood paneling and trim; combustible ceiling tile</td>
</tr>
<tr>
<td>Board and Care Fire, Mississauga, ON</td>
<td>Mar 1995</td>
<td>8</td>
<td>12</td>
<td>Very high fuel load in individual spaces, primarily result of occupants bringing inappropriate upholstered and uphoute from home</td>
</tr>
<tr>
<td>Stadium Fire, Atlanta, GA</td>
<td>Jul 1993</td>
<td>0</td>
<td>0</td>
<td>Significant fuel loading from combustible interior furnishings and finishes; plastic vision panels allow rapid flame spread between suites</td>
</tr>
<tr>
<td>Stadium Fire, Irving, TX</td>
<td>Oct 1993</td>
<td>0</td>
<td>0</td>
<td>Significant fuel loading from combustible interior furnishings and finishes; plastic vision panels allow rapid flame spread between suites</td>
</tr>
<tr>
<td>Private Club Fire, Indianapolis, IN</td>
<td>Feb 1992</td>
<td>1</td>
<td>4</td>
<td>Highly combustible interior finishes; wood paneling; multiple layers of wallcovering; decorative cabinetry; double ceiling assembly</td>
</tr>
<tr>
<td>Board and Care Fire, Colorado Springs, CO</td>
<td>Mar 1991</td>
<td>25</td>
<td>8</td>
<td>Combustible ceiling material</td>
</tr>
<tr>
<td>Hotel Fire, Miami Beach, FL</td>
<td>Apr 1990</td>
<td>9</td>
<td>21</td>
<td>Combustible ceiling material</td>
</tr>
<tr>
<td>Fraternity House Fire, Berkeley, CA</td>
<td>Sep 1990</td>
<td>3</td>
<td>2</td>
<td>Combustible interior finish materials; folding wall panel; extensive wood paneling -- especially in the corridors and open stair</td>
</tr>
<tr>
<td>Fatal Board and Care Fire, Bessemer, AL</td>
<td>Sep 1990</td>
<td>4</td>
<td>-</td>
<td>Polyurethane cushioning of upholstered furniture; multiple layers of wallcovering</td>
</tr>
<tr>
<td>Fatal Office Building Fire, Atlanta, GA</td>
<td>Jun 1989</td>
<td>5</td>
<td>20</td>
<td>Multiple layers of highly combustible interior finish on walls of access corridors; wood veneer plywood walling</td>
</tr>
<tr>
<td>High Rise Apartment Fire, Manhattan, NY</td>
<td>Jan 1988</td>
<td>4</td>
<td>9</td>
<td>Significant fuel loading by interior furnishings, finishes and contents as part of incremental building alterations</td>
</tr>
<tr>
<td>First Interstate Bank Building, Los Angeles, CA</td>
<td>May 1988</td>
<td>1</td>
<td>40</td>
<td>Combustible nature and geometric arrangement of open office furnishings in a large open floor plan</td>
</tr>
<tr>
<td>Rooming House Fire, Massapequa, NY</td>
<td>Aug 1986</td>
<td>5</td>
<td>1</td>
<td>Highly combustible interior finishes; cellulose-based ceiling tile; extensive use of combustible wood paneling and wainscot</td>
</tr>
<tr>
<td>DuPont Plaza Hotel Fire, San Juan, PR</td>
<td>Dec 1986</td>
<td>97</td>
<td>140</td>
<td>Very high fuel load and smoke toxicity in area of incident due to storage of furnishings and packaging materials (including upholstery pieces containing urethane foam); combustible movable partitions separating meeting/ball rooms</td>
</tr>
<tr>
<td>Haunted Castle Amusement Fire, Jackson Township, NJ</td>
<td>May 1984</td>
<td>8</td>
<td>0</td>
<td>Highly combustible and toxic interior finishes; synthetic foam, various fabrics and plastics, plywood, and tar paper; poorly lit, convoluted passages; disconcerting, unconventional environment of a haunted house</td>
</tr>
<tr>
<td>Boarding House Fire, Beverly, MA</td>
<td>Jul 1984</td>
<td>15</td>
<td>9</td>
<td>Highly combustible interior finishes; wood wainscot and plywood paneling with cardboard underlayment; exposed fiberboard on ceiling</td>
</tr>
<tr>
<td>Hotel Fire, Paterson, NJ</td>
<td>Oct 1984</td>
<td>15</td>
<td>50</td>
<td>Highly combustible interior finishes; extensive use of wood paneling; cellulose fiber ceiling tile and other suspended ceilings</td>
</tr>
<tr>
<td>Central Community Home Fire, Worcester, MA</td>
<td>Apr 1983</td>
<td>7</td>
<td>1</td>
<td>Highly combustible interior finish in exits and exit access corridors; wood paneling</td>
</tr>
<tr>
<td>Annandale Village Fire, Gwinnett County, GA</td>
<td>Aug 1983</td>
<td>8</td>
<td>0</td>
<td>Wide use of highly combustible wood paneling in lower level interior walls assemblies (in some cases, the paneling was applied directly to the wood studs in lieu of gypsum board)</td>
</tr>
<tr>
<td>Motel Fire, Dayton, OH</td>
<td>Nov 1983</td>
<td>1</td>
<td>20</td>
<td>Highly combustible interior finish materials in the exit access corridor; plywood/pressed board paneling; carpeting with foam underlayment</td>
</tr>
<tr>
<td>Hotel Fire, Las Vegas, NV</td>
<td>Feb 1981</td>
<td>8</td>
<td>350</td>
<td>Highly combustible interior finishes; carpeting as wall and ceiling finish; concentrated combustible drapery and upholstery materials promoted vertical spread of fire</td>
</tr>
<tr>
<td>Hotel Fire, Kearney, Nebraska</td>
<td>Jan 1981</td>
<td>0</td>
<td>22</td>
<td>High concentration of combustible interior materials, especially multiple layers of wallcovering in egress corridor</td>
</tr>
<tr>
<td>Hotel Fire, Las Vegas, NV</td>
<td>Nov 1980</td>
<td>85</td>
<td>700</td>
<td>Extensive use of highly combustible and thermoplastic interior finish materials; multiple layers of wall finish (wallcovering and paneling in Deli); elaborate decorative trim (simulated marble, wood, plastic reflective ceiling panels in the Casino); extensive free-standing foam-padded furnishings (booths, gaming tables, restaurant and lounge seating) in the Casino</td>
</tr>
<tr>
<td>Hotel Fire, Cambridge, OH</td>
<td>July 1979</td>
<td>10</td>
<td>82</td>
<td>Highly combustible interior finishes; combustible wallcovering in stairway; multiple layers of wallcovering</td>
</tr>
<tr>
<td>Hotel Fire, Greece, NY</td>
<td>Nov 1978</td>
<td>10</td>
<td>34</td>
<td>Highly combustible interior finishes; plywood paneling -- especially in stair</td>
</tr>
<tr>
<td>Beverly Hills Supper Club, Southgate, KY</td>
<td>May 1977</td>
<td>165</td>
<td>70</td>
<td>Concealed combustible ceiling tile; highly combustible interior finish; extensive use of wood paneling and drapery; exhiways decorated to appear as window dressing; extensive use foam padding in furnishings and carpeting treatments</td>
</tr>
<tr>
<td>Night Club Fire, New Orleans, LA</td>
<td>Jun 1973</td>
<td>32</td>
<td>12</td>
<td>Highly combustible interior finishes; wood paneling; wood ceiling; combustible cellulose and fabric wallcoverings paper wall decorations; substandard carpeting</td>
</tr>
</tbody>
</table>

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fraction of lives lost and injuries incurred from like fires. Furthermore many of the fire investigation documents describe the contribution of interior finish and interior space content to the involvement and spread of the flame and toxic smoke; however, for purposes of clarity and precision, unless the NFPA investigation report expressly listed interior finish and/or content as a direct contributor to the loss of life and property, it was omitted from this register. For example, in a report on the Holiday Inn fire in Cambridge, Ohio on July 31, 1979, investigator David P. Demers observed,

The fire again illustrates common problems associated with hotel fires. A hotel incident that took place on November 26, 1978 in Greece, New York, and took ten lives had primary factors leading to the fatalities that were similar to those in the Cambridge, Ohio fire. These included combustible interior finish, unprotected vertical openings, and inadequate alerting of occupants. Both incidents further point out that no matter how many “exits” a building provides, once the exit access becomes untenable, the means of egress system is unusable for escape.6

Assembly Occupancies: Clubs, Nightclubs, Stadiums, and Amusement Facilities7

Fires in assembly occupancies have proved to be some of the deadliest.8 In its case study of nightclub fires, the NFPA provides an historical perspective of the extreme

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7 For the purposes of this study, an assembly occupancy if defined as an occupancy (1) used for a gather of 50 or more persons for deliberation, worship, entertainment, eating, drinking, amusement, awaiting transportation, or similar uses; or (2) used as a special amusement building, regardless of occupant load. Assembly occupancies might include the following: armories, assembly halls, auditoriums, club rooms, dance halls, drinking establishments and exhibition halls among others. See Study Definitions in Chapter Two.

potential for loss of life in assembly occupancies. Theatres were the most common assembly type that resulted in large numbers of fatalities. The most notorious theatre fires of the nineteenth century took the lives of more than 1,500 patrons. In just over ten years, between 1876 and 1887, 1,476 theatre-goers lost their lives in theatre fires in New York, Vienna, Paris, and Exeter, UK. In December of 1903, the Iroquois Theatre in Chicago, IL, touted as “Absolutely Fireproof” became the deadliest fire in an assembly occupancy in the United States after 602 patrons lost their lives. According to the NFPA:

Common contributing factors in these fires were lighting (candles, gas lamps, or electric stage lights) igniting combustible materials on or near the stage; inadequate, blocked/locked, or poorly designed egress systems; and combustible interior finish. In each of the cases previously mentioned the fire began in the area of the stage as a lighting fixture came in contact with combustible materials nearby and spread rapidly, spreading heat and smoke over the audience, resulting in a rush to the exits. In these examples, egress systems were often inadequate in number or design, if not blocked or otherwise nonfunctional. These conditions led to many occupants being overcome before they could reach an exit, resulting in large losses of life. In the case of the Iroquois Theatre, the facility was touted as “Absolutely Fireproof” as a way to ease the concerns of patrons. While the building itself may have been noncombustible, the interior finish, contents, and other furnishings were not.

Despite changes and continuing refinements in building and life safety codes since the turn of the twentieth century, the same dangers persist and the descriptions of contemporary assembly occupancy fires remain eerily similar. Many of the issues

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10 Ibid., 2.
identified in the analysis of these historic and of other more contemporary fires, particularly the significant issues surrounding interior finish and content, continue to impact public safety. On February 21, 2003, in a small nightclub in West Warwick, Rhode Island, the headlining band took the stage at 11:07 p.m. Several seconds later, pyrotechnic devices were activated in the center of the stage and sparks ignited the materials on the walls around the platform. Within four minutes and thirty seconds, “…thick black smoke [is] within twelve inches of the floor and bright orange flames [are] deep within the building.” All totaled, 100 civilians were killed and more than 200 victims were injured in a fire that took less than six minutes to fully engulf the building and in which no patron was more than seventy-five feet from an exit.\(^\text{11}\) Much like the theatre tragedies of the past, interior finish played a significant role in the loss of life and property. According to the fire investigation report:

> Not only was the interior finish easily ignited but it also allowed for the rapid spread of the fire within the building. …The presence of combustible interior finish in the area of the fire’s origin affected the ability of the occupants to egress the building that night. The fire created conditions within the building that prevented many from reaching an exit before being overcome by smoke and heat.\(^\text{12}\)

> Even with the extensive coverage of the Station nightclub fire and a rapid response to local and international code recommendations based on the lessons from

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\(^{11}\) Ibid., 16-17. The timeline and description is based on video footage filmed for an upcoming story on nightclub safety in the days following 21 fatalities in a crowd crush incident at the Chicago E2 nightclub just four days before.

\(^{12}\) Ibid., 22.
this fire, a similar pyrotechnics fire (fired by a club patron) in a nightclub in Buenos Aires, Argentina resulted in 194 deaths and over 700 injuries in December of 2004.\(^\text{13}\)

In the Beverly Hills Supper Club fire in Southgate, Kentucky on May 28, 1977 that killed 165 civilians and injured seventy others, the interior finish in a main corridor was found to have contributed to the rapid spread of fire. Specifically, concealed, combustible ceiling tile above a dropped ceiling, hardboard paneling applied over wood furring strips, and decorative finishes in gathering spaces were implicated in the loss. In the Viennese Room, one of the large ballroom spaces, “The door was reportedly camouflaged by drapes to look like a window.”\(^\text{14}\) In the Cabaret Room where the majority of deaths occurred, “two single doors [were] camouflaged to look like part of the wall” by using wood paneling.\(^\text{15}\)

A fire at the Indianapolis Athletic Club in Indianapolis, Indiana, a private hotel and athletic club constructed in 1922, resulted in one civilian death and four civilian injuries on February 5, 1992. The nine-story, mixed-use building housed twenty-three banquet rooms, several lounges and various athletic accommodations including a basketball court, racquetball and squash courts, track, swimming pool, and fitness center. These spaces, classified as assembly occupancies by the 1991 edition of NFPA 101, Life Safety Code®, were located on floors one through five as well as on the ninth floor. The

\(^{13}\) Ibid., 26.

\(^{14}\) Richard L. Best, “Tragedy in Kentucky,” \textit{Fire Journal} 72, no. 1 (1978): 29. Best noted that a waitress later said that there was an exit sign above the curtains.


122 Chapter Three
same code classified the balance of the spaces, guest rooms and suites on floors five
through eight, as hotel occupancies.\textsuperscript{16}

The combustible interior finish in the McHale Room may have contributed to the flashover. It is generally recognized that the combustibility of the interior finish in an enclosure can greatly reduce both the heat release rate necessary for flashover and the pre-burn time before flashover.\textsuperscript{17} This was especially true in the Indianapolis Athletic Club, since the wood paneling in the McHale Room was placed on furring strips rather than being attached directly to the noncombustible substrate material.

This installation allowed the majority of the radiant heat impinging on the paneling to be absorbed by only the paneling. Thus the paneling would have been brought quickly to its ignition temperature. Had the wood paneling been mounted directly to a noncombustible substrate material, a large amount of radiant heat would have been transferred to the substrate material, and the time required to raise the paneling to its ignition temperature would have been increased…. 

After the flashover in the McHale Room, the wood paneling and other fuels in the McHale Room produced copious amounts of excess pyrolysate, and these hot, unburned combustion gases escaped into the elevator lobby/corridor area.... The gases were then ignited as they mixed with available oxygen in this area. The resulting fire, in turn, ignited the multiple layers of wall covering in the elevator lobby and the wood paneling in the corridor. In addition, other combustible materials, e.g., decorative wood cabinets, were ignited in the corridor. It is likely that a “flame-over” occurred in the corridor, simultaneously causing lethal conditions in that area.\textsuperscript{18}


\textsuperscript{17} Ibid., 26-27. Here, Isner refers to \textit{NFPA Fire Protection Handbook}, 17\textsuperscript{th} edition, Section 6/Chapter 3, 6-38.

\textsuperscript{18} Ibid. 26-27. Relying on corridor tests conducted by the National Bureau of Standards as outlined in \textit{NFPA Fire Protection Handbook}, 17\textsuperscript{th} edition, Section 6/Chapter 4, “Interior Finish,” 6038, Isner defines the term “flame-over” as the “rapid spread of flame over one or more surfaces.”
Later in the report, Isner would compare the rapid flame spread in the McHale Room and the corridor described above with that in the Large Dining Room, immediately adjacent to the corridor. Unlike the McHale Room, which had two distinct ceiling assemblies suspended below the concrete floor assembly above (creating a concealed area and substantial fuel load for fire above), the Large Dining Room had the same one-foot-by-one-foot, apparently fiber-based ceiling tiles glued directly to the underside of the original plaster ceiling and only a single layer of vinyl wall covering. As a result, “Very few of the materials in the Large Dining Room contributed to the burning in that space. The ceiling tiles in the Large Dining Room were not readily ignited, …In addition, the majority of the light combustibles on tables, e.g., table cloths and napkins, did not burn”\(^\text{19}\)

In the second floor of the New Orleans French Quarter nightclub, The Upstairs Lounge, a fire killed thirty-two and injured twelve others on June 24, 1973. Combustible wood paneling, burlap fabric and rayon fiber-flocked wallcovering, and substandard carpet, particularly in the stairway where the fire was deliberately set, provided fuel for the fire and contributed to the speed at which the fire spread, trapping patrons in the upstairs bar.\(^\text{20}\)


Two stadium fires that occurred within months of one another, share a great deal in common, particularly with respect to the rapid growth potential of fires in furnished and decorated suites. The first fire, at the Atlanta Fulton County Stadium in Atlanta, Georgia occurred on July 20, 1993; the second fire occurred at Texas Stadium in Irving, Texas on October 13, 1993. Both fires illustrate the impact to “noncombustible buildings in which combustible materials are brought into the building for operational and aesthetic purposes.”21 The fire investigation report states:

The noncombustible materials used to construct buildings do not contribute to the fire; however, the room contents, furnishings, and interior finishes provide a significant fuel load and can support a substantial fire. The resulting fire can be quite severe, risking the safety of building occupants and causing extensive damage to building contents and structure.22

Moreover, the fires in each stadium damaged and ignited the plastic vision panels facing the playing field and allowed the fire to spread horizontally from one suite to another. In the case of the Texas stadium fire, the “burning material from the damaged panels dropped onto and ignited the hard-backed plastic chairs in the general seating area. Flames rising above these burning chairs, in turn, damaged and ignited the plastic vision panels in the lower level suites, and flames entered the suites igniting

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21 Michael S. Isner, Summary Fire Investigation Report: Two Stadium Fires: Atlanta, Georgia, July 20, 1993 and Irving, Texas, October 13, 1993, (Quincy, MA: National Fire Protection Association, 1993), 12, accessed June 20, 2013, http://www.nfpa.org/catalog/services/customer/downloadmemberonlypdf.asp?pdfname=fiatlanta2.pdf&src=nfpa. According to the NFPA Glossary of Terms, the term “fuel load” is used to describe the total quantity of combustible contents of a building, space, or fire area, including interior finish and trim. Although not defined within the fire investigation report, we must assume that this is the definition Isner intends.

22 Ibid.
furnishings, contents, and interior materials,” effectively spreading the fire vertically through the building.\textsuperscript{23} Fortunately, both stadium fires occurred when only a small number of people occupied the facility, thus no lives were lost. However, the fire growth and spread mechanisms illuminated in these two fires serve as a reminder of the potential for substantial damage and loss.

In the early evening hours on May 11, 1984, a rapidly spreading fire destroyed the Haunted Castle amusement facility at the Six Flags Great Adventure park in Jackson Township, New Jersey, killing eight young adult visitors. According to the fire investigation report:

The following are considered to be major factors contributing to the loss of life in this fire:

- The failure to detect and extinguish the fire in its incipient stage by means of fixed fire detection and suppression systems.

- The ignition of synthetic foam material, and subsequent fire and smoke spread involving combustible interior finishes and contents.

- The difficulty of escape by occupants due to fire conditions in the haunted house type of event.\textsuperscript{24}

Despite the existence of a total of seven exits, emergency lighting, and portable fire extinguishers, “the interiors of the trailers were designed to simulate the atmosphere

\textsuperscript{23} Ibid., 13-14.

of a Haunted Castle through the use of a darkened, convoluted series of passageways that were intended to disorient and scare the visitors for amusement purposes as they progressed through the facility,” and thus likely contributed to confusion and even acceptance of fire conditions.25 “Some of the visitors seemed to initially accept a smoky condition as part of the environment, and one group of youngsters within the structure apparently viewed the actual fire in its incipient stage and remarked how real the illusion seemed... only to comprehend on closer examination that the fire was real.26 The one-story structure was comprised of seventeen commercial trailers; materials for the interior included synthetic foam, various fabrics, plastics, plywood, tar paper, and a variety of decorative content. The fire, ignited by a visitor lighting his/her way through a darkened corridor due to a lighting malfunction, spread rapidly over the apparently untreated wall-mounted polyurethane foam, further fueled by the plywood construction of the ceiling, floor, and walls.

Health Care Occupancies: Board and Care Facilities and Nursing Homes27

Unlike most other buildings and occupancy types, the least desirable emergency action in a health care occupancy is the wholesale relocation or evacuation of

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25 Ibid., 4.
26 Ibid. 15.
27 Health care occupancies are those facilities used to provide medical or other treatment or care simultaneously to four or more patients on an inpatient basis, where such patients suffer from physical or mental illness, disease, or infirmity, and for the care of infants, convalescents, or infirm aged persons. See Chapter Two.
patients. “Occupants are considered to be incapable of self-preservation ... due to age, physical or mental disabilities, or security measures not under their control. A significant number of occupants in health care facilities are assumed to be nonambulatory or bedridden. Other occupants, while capable of self-movement, might have impaired judgment.” Thus, a “total concept” approach to fire protection is necessary to the safety of occupants, which includes both active and passive systems. Passive systems such as appropriately designated interior finish and interior space content are integral to slow the spread of fire and smoke that pose danger to occupants during a fire incident. Consistently, issues raised in deadly health care occupancies relate to highly combustible interior finish materials, and very high fuel loading from combustible interior furnishings.

Such was the case in a board and care facility in Mississauga, Ontario when, on March 21, 1995, eight residents were killed and twelve were injured. The fire investigation report cites “combustible room contents”, among other deficiencies, such as the lack of sprinkler protection, the failure of staff to close the door of the room of fire origin following detection of the fire, and the lack of staff training and fire drills as “significant factors that contributed to the outcome of this incident.”

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29 Ibid., 536.
Similar room contents contributed to the progress and rapid spread of a September 19, 1990 fire in a board and care facility in Bessemer, Alabama. “The open flame ignition of the couch led to the rapid growth, development, and spread of the fire. Once ignited, the fire soon involved the polyurethane cushioning of the couch …it is believed that the multiple layers of wallpaper contributed to the fire spread up the rear wall. As the unchecked fire continued to grow, it spread to other upholstered furniture in the day room, blocking the exits from this room and leading to untenable conditions and then flashover.31

Combustible interior finish, particularly in stairways, was cited as a contributing factor in a fire at the Central Community Home board and care facility in Worcester, Massachusetts that claimed the lives seven former mental health patients and injuring one on April 19, 1983. “Although the occupants were apparently alerted early to the fire, they did not have time to escape from the building before exit access corridors and the exits themselves became untenable due to the fire.”32 According to the investigative study, “The presence of combustible interior finish in exits and exit access corridors” was listed third among six “major contributing factors to the loss of life in the Central

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Community Home fire.” Wood paneling was used extensively throughout the facility in rooms, corridors, and stairways, contributing to the rapid spread of fire throughout the second and third floors, including both stairways. Among the other contributing factors cited were 1) stairs were not enclosed with fire barriers or otherwise protected, 2) the fire was not extinguished in its incipient stage, 4) fire exit drills were not conducted, 5) there was no direct fire alarm connection to the fire department nor was a staff person on duty to notify the department at the time of the incident, and 6) sleeping room doors had an inadequate fire protection rating and were not self-closing.

The use of “highly combustible wood paneling in lower level wall assemblies” was named first in a list of four significant factors contributing to the deaths of eight mentally handicapped residents of the Annandale Village long-term care facility in Gwinnett County, Georgia on the morning of August 31, 1983. Disconcertingly similar to the board and care cases already discussed, the three additional factors listed in the report include 2) an open interior stairway connecting the upper and lower floors, 3) corridor arrangements throughout that did not provide access to at least two exits from

33 Ibid.
34 Ibid., 2, 4.
35 Ibid., iv.
each level, and 4) the inadequacy of single station smoke detectors to alert sleeping occupants of the developing fire.\(^\text{37}\)

Similar issues were cited in the Colorado Springs Crystal Springs Estate board and care facility fire in which nine elderly residents died, and another eight residents were injured in the early morning hours of March 4, 1991. In particular, the ceiling and other finishes in the west wing dining room were implicated, including exposed ceiling timbers and planks with an applied finish coating that allowed the fire to spread rapidly across its surface.\(^\text{38}\) As if to summarize the issues present in all board and care cases, the investigator states in his report:

> After the fire protection features in the building failed to provide early warning and failed to contain the fire to the area of origin, the potential for survival became increasingly dependent upon the capabilities of the occupants. As a result, the occupants’ level of training, their ability to make decisions quickly after being awakened and while facing rapidly deteriorating conditions, and the occupants’ physical capabilities probably had an impact on their survival.\(^\text{39}\)

The investigator makes an interesting point about the Crystal Springs Estate incident. The facility was in the process of changing its occupancy type to a personal care boarding home. Here the investigator references an NFPA memo disseminated to state fire marshals, metro fire chiefs, state training directors and provincial fire marshals,}
dated July 14, 1984, that addresses many of the issues found in recent boarding home fires. Along with a listing of many of the issues implicated in the Crystal Springs Estate incident – and nearly all the other health care incidents listed in this study – the memo addresses the issue of occupancy change over time, an issue that is significant to the application of interior space content. That is, the problem of modifications to interior space content in existing buildings that are governed by superseded codes until significant alterations or changes in occupancy type trigger implementation of current standards, a problem identified by the United States Fire Administration (USFA) / Federal Emergency Management Agency (FEMA) in its 1987 and 1999 conference task forces on fire and the built environment as critical reasons for the high mortality rate from fire in the United States (see Chapter One, Relationship to the Interior Design Profession.) The NFPA memo states, “Many of the facilities were either licensed for an occupancy other than a boarding home (such as a hotel) or were unlicensed, underground “boarding homes.”40 We shall address this matter more fully in Chapter Four.

Residential Occupancies: Dormitories, Lodging/Rooming Houses, Apartments, Hotels/Motels41

Although the occupants are ambulatory and are conceivably capable of self-preservation, many of the same concerns with life-safety in other types of residential spaces are similar to those in health care occupancies. And, because of the desire for

40 Ibid., 37.

41 See Chapter Two, Study Definitions, for detailed definitions of dormitory, lodging or rooming house, and apartment building and/or condominium.
many of these spaces to appear homey, fashionable, even posh, the extensive use of interior space content can significantly increase occupant risk. Furthermore, fuel load intensities that often come with the frequent and ad hoc renovation and/or redecoration exacerbate the hazard. Consistently, highly combustible interior finishes and content, the extensive use of paneling, wainscot, and wood and other trim, and the impact of continuous incremental finish changes such as layering of wallcovering, paneling, ceiling materials and other finishes, especially in egress corridors and stairways, are implicated in the loss of life and property.

In a fire at the Phi Gamma Delta fraternity house in Chapel Hill, North Carolina on the night of May 11, 1996, that killed three occupants and injured three others, the combustible interior finish materials are listed first as the significant factors that contributed to the loss of life.\(^4\)\(^2\) The fire investigation report states:

> The fire in the basement was intense because of the quantity, type, and installation of interior finish in the basement. The wood boards described as “heart pine” covered all the walls in the bar room sitting area and dining room, providing a large quantity of combustible materials in these spaces.....Heart pine, like all pine woods, is a soft, low-density wood. High-density materials of the same generic type (woods, plastics) conduct energy away from the area of the ignition source more rapidly than low-density materials, which act as insulators and allows the energy to remain at the surface. For example, given the same ignition source, oak takes longer to ignite than soft pine. A second factor affecting conductive heat transfer was that the interior finish was installed on furring strips rather than directly on non-combustible substrate materials. This installation again reduced the conducive heat transfer through the wood, allowing it to retain even more heat....The amount of wood finish that was consumed and the

damage in the basement’s open area revealed that the heart pine wood covering the walls in this area was the primary fuel source.\footnote{Ibid., 24-25.}

It was a similar story on September 8, 1990 when a fire killed three students and injured two others at the Phi Kappa Sigma fraternity house at the University of California Berkeley. Like the Phi Gamma Delta fraternity house in Chapel Hill, “combustible interior finishes throughout the building” were cited as a significant contributing factor to the loss of life and property.\footnote{Michael S. Isner, \textit{Fire Investigation Report: Fraternity House Fire: Berkeley, California, September 8, 1990} (Quincy, MA: National Fire Protection Association, 1990.), 2, accessed June 21, 2013, http://www.nfpa.org/catalog/services/customer/downloadmemberonlypdf.asp?pdfname=Flberkeley.pdf&src=nfpa.} All interior wall surfaces, including the exit stairways, were covered with wood paneling in addition to a sublayer of plywood to resist loads imposed during earthquakes. A few sleeping rooms had a second layer of the sheet wood paneling, and one room had rustic barn board covering its walls.\footnote{Ibid, 2, 11.} The fire investigation report describes the growth and spread of the fire:

The combustible interior finish in the corridors and stairways allowed the fire to burn fiercely in these areas. The fire burned through the hollow-core wood doors that were used for most sleeping rooms, and the contents and combustible interior finish in these rooms contributed even more fuel to the fire. With burning occurring on both sides of many interior partitions, the wall coverings and substrates of both plywood and gypsum wallboard either were consumed by the fire or deteriorated and fell away. As a result, the studs and other interior structural members also became part of the fuel load.\footnote{Ibid., 29.}
Like issues were cited in the rooming house fire in Massapequa, NY on August 23, 1986, that claimed the lives of four residents and injured one. The fire investigation report describes the growth and development of the fire, which started on the front porch of the facility:

In the early stages of the fire, flames entered the open living room window igniting curtains and other decorative wall hangings. As more fuel was consumed by the fire, the heat generated caused temperatures in the room to rise rapidly. At the same time, smoke and toxic gases were being produced in great quantities. Before long, the entire living room was involved in fire and flames were quickly spreading to adjacent rooms on the first floor and up the open stairway located nearby. Besides the typical room furnishings that are normally present in such occupancies, the fire was also fueled by wood wainscoting, combustible ceiling tiles, and thin wood paneling. Once the fire reached the open stairway, it ignited these wall and ceiling finish materials.47

Analogous descriptions are found in fire investigation reports of many other residential facilities:

- the Fontana Hotel fire in Miami Beach, Florida on April 6, 1990, in which nine hotel guests died and twenty-one persons were treated for injuries;
- the Elliott Chambers boarding house in Beverly, Massachusetts on July 4, 1984, responsible for the death of fifteen residents and injury to nine others.48

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• the Alexander Hamilton Hotel Fire in Paterson, New Jersey, October 18, 1984, that resulted in the deaths of fifteen persons and injuries to over fifty; 49
• the Travel Master Inn Motel in Dayton, Ohio on November 23, 1983, that killed one guest and injured over twenty others; 50 and
• the Holiday Inn – Northwest hotel in Greece, New York on November 26, 1978, that resulted in the deaths of ten occupants and injuring thirty-four more. 51

Other fire incidents clearly illustrate contributions to loss of life and property through incremental interior alterations that substantially increased the fuel loads and/or modified egress passages and exit discharge conditions. Recurrent redecorating, or changes of finishes and other interior content, often occurring outside of the purview of code or other regulatory agencies, and which are not significant enough to trigger a requirement to update the spaces to the most current code, can have a substantial impact on life safety.

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Such is the case in the January 11, 1988 high-rise apartment fire in Manhattan, New York that killed four residents and injured nine others. The fire investigation report describes the impact of incremental change:

Through the years, conditions within the building changed. Most of the interior exits were sealed off and doors in exitways were removed. Alterations on the first floor made the two remaining interior stairways discharge through the same lobby and resulted in both stairways being vulnerable to blockage by a single fire. The alternations on the first floor also increased the combustibility of the interior finish in some areas. These changes contributed to the fire hazard and decreased the level of occupant protection.52

In the Holiday Inn fire in Cambridge, Ohio on July 31, 1979, a near carbon copy of the 1978 Holiday Inn fire that killed ten in Greece, New York, multiple layers of wall coverings in the main corridors and stairs from “redecoration” contributed to rapid fire growth that killed ten people and injured eighty-two.53 The multiple layers of wallcovering added significant fuel load to the fire such that use of the corridors and stairs became impossible. In fact, at the time of the investigation report, the investigator had been unable to locate any fire survivors that used the corridors for evacuation: “So far as is known, all survivors escaped only after exterior windows were broken by occupants, other civilians on the fireground, police, and fire fighters.”54


And, on January 16, 1981, the Holiday Inn fire in Kearney, Nebraska once again illustrated the danger inherent in multiple layers of wallcovering due to renovation and redecoration, particularly in paths of egress or common paths of travel. In this fire, “the entire corridor system of some 500 feet was rendered untenable for egress purposes early in the fire.”\(^55\) Fortunately, no deaths resulted from this fire. Twenty-two people were transported to the hospital for treatment of their injuries, including one critically burned casualty.\(^56\)

Interior space content, particularly in luxurious, even extravagant interiors common to large conferencing hotels and casinos has proved to be a persistent contributor to loss of life. A November 21, 1980 fire at the MGM Grand Hotel resulted in the deaths of eighty-five guests and hotel employees; nearly 600 other civilians were injured in the course of the fire and approximately thirty-five fire fighters required medical attention during and in the wake of the fire.\(^57\) The first of six “major factors that contributed to the loss of life” was the “Rapid fire and smoke development on the Casino level due to available fuels, building arrangement, and the lack of adequate fire

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\(^56\) Ibid.

This extensive fuel loading provided by the interior finish and content intensified the rapid spread of the fire and smoke development. For example, interior finish materials in The Deli, the restaurant where the fire began as a result of an apparent electrical short-circuit, had multiple layers of materials as a result of numerous, consecutive renovations. In one area, the wall construction of the serving station was 1/8-inch gypsum wallboard on steel studs, covered with vinyl wallcovering, covered with 1/4-in thick wood paneling, which, in turn, was covered by 1/16-inch wood paneling. Other first floor interior space content was extensive:

The Casino interior finish included plastic decorative trim such as simulated marble, wood decorative trim and plastic mirrors in the ceiling. These mirrors were reported to be made of methyl methacrylate. This plastic mirrored appearance continued to the porte cochere on the west exterior of the Casino which had over three hundred, 30- by 30-inch such reflective panels.

In general, the fuel load in The Deli and Casino areas was provided by contents in addition to previously described interior finishes. The contents of The Deli, which was about 3,500 square feet in area, included free-standing chairs padded with what appeared to be polyurethane foam. Along the south wall were wrap-around booths, which also appeared to be padded with thick polyurethane foam and covered with a vinyl material...

The fuel load in the Casino, approximately 68,000 square feet in area, included furnishings, other contents and interior finishes comprised of plastic materials that appeared to have included polyvinyl chloride, polyurethane, polystyrene, and methyl methacrylate. The Casino furnishings included gambling tables with thick foam plastic padding with plastic covering around the edges. The seating for restaurants and lounges contained foam plastic padding. In addition, the area above

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58 Ibid, vi.
59 Ibid., 5.
the ceiling of the Casino contained a fuel load in the form of plastic insulation on electrical power distribution and communications wiring. Aided by a supply of fresh air from the Arcade through an open escalator, the fire moved extremely rapidly through the Casino, consuming the contents and producing large amounts of heat, smoke and toxic gases through the plenum above the ceilings and on to the high-rise tower through the building’s vertical openings. Overall, sixty-one victims were killed in the high-rise tower and eighteen victims were located on the Casino level. Of these eighteen, three were apparently overrun by the fast-moving flame front progressing through the Casino.

Not unlike the MGM Grand Hotel fire, extremely rapidly moving fire, fueled by concentrated interior space content, resulted in ninety-seven fatalities including seventeen employees and 146 injuries from a fire at the DuPont Plaza Hotel in San Juan, Puerto Rico on December 31, 1986. The fire, which began in an unoccupied ballroom that was being used to store temporary guest room furniture to be used in an ongoing renovation, developed quickly and spread violently into an unenclosed stairway foyer and into the highly decorated and furnished lobby/casino level. A smoke front, followed by a flame front, moved through the casino and lobby area leaving “little time

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60 Ibid.

61 According to the NFPA fire investigation report, in several, victims were moved before their locations within the building complex could be recorded. Three bodies were removed from the roof; two additional victims were transported and pronounced dead on arrival at local hospitals. Their locations within the high-rise tower were not known.

between recognition of impending danger from the fire and its movement through the area.\textsuperscript{63} Unlike the MGM Grand fire, nearly all the fatalities were located in the casino or in the hotel’s main lobby area. Although significant amounts of smoke, heat, and toxic gases penetrated the high-rise tower, it was felt that “the exterior balconies provided occupants trapped for hours with a safe refuge area until the fire could be suppressed or they could be assisted by rescuers.”\textsuperscript{64} Only one fatality occurred in the high-rise tower.

On February 10, 1981, less than three months after the MGM Grand Hotel tragedy, eight people died and 350 were injured in the largest hotel fire in the United States, the Las Vegas Hilton. This fire is of great technical significance because it illuminates issues of exterior, vertical fire spread primarily through radiation, made possible by highly combustible interior space content.\textsuperscript{65} The fire began in the eighth floor elevator lobby and, due to carpeting on the walls and ceiling, quickly developed, engaging the upholstered seating and heavily draped window treatments at the end wall. As the intensity of the fire increased and broke out the lobby window, flames, fed by the influx of oxygen, licked up the exterior of the building, creating a “flame front” that reached the top of the building. The resultant radiant heat transfer from the exterior flames, in turn, ignited the highly combustible draperies and other interior finish content on each successive floor as the fire moved vertically to the roof. Consequently, fire,

\textsuperscript{63} Ibid., iv.

\textsuperscript{64} Ibid.

smoke, and toxic gasses then spread horizontally on each consecutive floor. In all, twenty-two of the building’s thirty stories were engaged in the fire, exposing a large number of building occupants to risk.\footnote{Ibid., ii, 4, 17-19.}

**Non-Residential Occupancies: High-Rises, Banks, Offices**

The lessons thus far, and the implication of interior space content is also relevant to non-residential spaces including high-rise office buildings and banks. Two such high-rise fires are included among the twenty-eight demonstrative cases.

On June 30, 1989, a rapidly developing fire occurred on the sixth floor of the occupied ten-story office building known as the Peachtree 25th Building in Atlanta Georgia claimed the lives of five people, injured twenty others, and caused heavy damage on the floor of the fire origin. Six fire fighters were also injured in the incident. The NFPA analysis of this blaze pointed to three major factors that contributed to the loss of life and property:

1. The rapid development of a severe fire as a result of arcing in the electrical room;
2. The immediate blockage of the egress path due to:
   a. The location of the room of fire origin;
   b. Rapid spread of fire in the corridor;
The investigative report goes on to implicate the existence of multiple layers of finish material in the sixth floor exit access corridor. The report describes the 170-foot long corridor:

Most walls in the elevator lobby had three layers of wallcovering applied over the gypsum wallboard...The material used first was not identified, the second layer was reportedly a grass-cloth, textured vinyl wall covering, and the third (exposed) layer was an air-entrained imitation suede, vinyl wall covering. Plywood having a wood finish veneer covered the east wall of the elevator lobby. Other walls along the corridor had only two layers of finish material. Again, the type of material used for the initial layer remains undetermined, and the exposed layer was the grass-cloth textured vinyl wall covering. The area near the west exit stairway appeared to have had only a single layer of the wall covering. This layer was the imitation suede material.\(^{68}\)

The fire analysis indicates that the fire in the access corridor spread extremely rapidly due to the extensive fuel load from the wall and floor finish materials. From the report, "In fact, the fire spread was so rapid that the fire in the corridor had burned itself out, and the only fire that remained when fire fighters entered the floor, about 7 minutes after the initial alarm, was at each end of the corridor where standard office furnishings were burning."\(^{69}\) On the matter of the dangers of multiple layers of wallcovering, the fire investigator is very clear:

This is not the first time multiple layers of wall coverings have been identified as a contributing factor in a fire. In July 1979, a hotel in Cambridge, Ohio experienced a fire that killed 10 people, and in January 1981, another hotel fire in Kearney, Nebraska injured 22 people... In both of these fire incidents, multiple layers of wall covering

\(^{68}\) Ibid., 5.

\(^{69}\) Ibid., 19.
materials were identified as having contributed to the fire severity. We can recognize that this condition did exist in the Atlanta building, that the materials in those layers contributed to the total fuel load in the corridor, and that they likely contributed to the fire spread rate.\textsuperscript{70}

A fire in the First Interstate Bank Building in the heart of the business district in Los Angeles, California on May 4, 1988, proved to be of “great technical significance” with respect to interior space content and “the role of modern office environment materials and their arrangement in relation to the fire growth and development.”\textsuperscript{71} Fortunately, the office high-rise fire occurred after business hours, limiting casualties, but the fire clearly illustrated for the first time the significant impact that open office furniture systems, a common and customary responsibility of commercial interior designers, can have on the intensity and acceleration of fire. The NFPA investigative report lists “Rapid initial growth, development, and spread of fire due to the combustible nature and geometric arrangement of the office furnishings in a large open office floor plan” as one of five “major factors contributing to the loss of life and the severity of fire….”\textsuperscript{72} The close geometric configuration of the workstations, which provided a greater than average fuel load from its compact arrangement and sound-absorptive components, in concert with the large open space typical of open office systems and

\textsuperscript{70} Ibid.


\textsuperscript{72} Ibid., ii.
thus, fewer constructed walls to slow the spread of fire, allowed the fire to accelerate wildly.

The combustible nature and arrangement of the fuel package enabled the fire to grow and spread to adjacent combustible materials, including adjacent rows of work stations and stored combustible material. Further, many of the rows of work stations in the trading area were arranged back-to-back, thus providing dense arrangement of fuels. Laboratory fire tests of a similar work station arrangement were conducted at the Center for Fire Research. The test results indicate that once open flaming occurred, it took just over 10 minutes for the fire to reach 1 MW (megawatt), but the intensity grew to 2 MW in an additional minute of burning. The facts related to this incident seem to parallel this sudden and dramatic increase in fire intensity.  

Although the fire resulted a single fatality, it caused nearly forty injuries and the total loss of use of the sixty-two-story structure for more than six months. The NFPA fire investigation report states, “The intensity of the fire was so severe... that the incident commander feared that structural collapse of the building might occur.”

To put it in perspective, “it took 64 companies and 383 firefighters 3-1/2 hours to eventually get ahead of the floor-to-floor fire spread and knock the fire down ....” The actual monetary loss has been estimated to be in the hundreds of millions of dollars (1988 dollars).  

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74 Ibid., 37.
75 Ibid.
76 Ibid., 26.
Analysis of Annualized Fire Data

The case study analysis above does much to identify issues implicated in fire incidents, but does little to characterize the relative frequency of events, or to begin to examine a direct causal link between the interior space content and loss from fire. For this, close examination of occurrence rates and details of fire incidents is essential.

The NFPA consistently collects and analyzes detailed data on fires reported to United States municipal fire departments, and, as a result of its extensive analyses, produces numerous reports and charts intended to collate and contextualize the information. These reports are particularly useful in this examination, most specifically in those occupancies targeted in this study: public and high-risk occupancies, those in which the public has had no say in the design decisions and/or spaces that, because of their unique use or structure, pose a special risk to their occupants. Using data collected over a period of years, the NFPA estimates and annualizes losses, and, because of the detailed nature of the fire data collected, the information is broken down not only by occupancy type but also by particular contributors to the loss. For each occupancy type tracked, the data includes an estimated average number of fires per year, as well as an estimation of civilian deaths and injuries, and direct property damage that resulted from those fires. In addition to a close examination of the NFPA categorized annualized losses, this study will analyze and collate data with regard to the item or items first ignited, and by the extent of flame damage. The intention is to begin to relate the data in this part of the investigation to issues that have surfaced in the case study analysis portion of the study.
Specific Methodology, Limitations, Delimitations

Much like the case study portion of this analysis, validation of data is essential; thus, only NFPA documentation that is made publicly available online by the NFPA Research Division were examined. The period of annualization, a critical data component to this investigation, varies by occupancy type due to the form of the data made publicly available by the NFPA and includes the four-year periods of 2004 to 2008, 2005 to 2009, 2006 to 2010, and 2007 to 2008. Consequently, it is important to note that, while the data are meaningful – and beneficial in establishing a relative scale of frequency of fire incidents – the variation in date spread makes it impossible to make comparative assumptions around a composite total from all the data presented. The author will refrain from doing so. As the organization of data allow, findings will be compared to the 2010 study period of 1999 to 2002 for indications of tendency or trend. Further, the author has compiled data from existing analyses produced by the NFPA, and, in doing so, has relied upon their analyses, their methods of analysis, and their interpretation, organization and presentation of its findings. Three major components of these NFPA analyses have been included in this study:

1. Annualized incident data.
   a. The statistics in this analysis are estimates by the NFPA, and are derived from the U.S. Fire Administration’s (USFA’s) National Fire Incident Reporting System (NFIRS) and the NFPA’s annual survey of United States fire departments. NFIRS is a voluntary system by which

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77 Annualized periods are clearly stated within charts and discussion of findings.
participating fire departments report detailed factors about the fires to which they respond. According to the NFPA, roughly two-thirds of domestic fire departments participate, although not all of these departments provide data every year. Additionally, fires reported to federal or state fire departments or industrial fire brigades are not included in these estimates. Analysts at the NFPA, the USFA, and the Consumer Product Safety Commission developed the specific basic analytical rules used for the analysis of such data.\textsuperscript{78}

b. The author utilized the data compiled by the NFPA for each occupancy type included in public and high-risk occupancies as defined in Chapter Two. The NFPA authors vary for each occupancy type, but the formatting and approach to data analysis remains consistent.\textsuperscript{79}

c. As noted above, the date spread of the four-year reporting periods used in the NFPA data varies according to the NFPA analyses made publicly available. The data used is the most recent data available and the dates are clearly defined within the findings.

d. The estimated average number of structure fires, the average annual losses – civilian deaths, civilian injuries, and direct property damage – are typically found in the “Abstract” and “Fact Sheet” of each respective occupancy report.

\textsuperscript{78} “The National Estimates Approach to U.S. Fire Statistics” by John R. Hall and Beatrice Harwood provides a more detailed explanation of national estimates procedure and assumptions.

\textsuperscript{79} A complete listing of the NFPA documents consulted can be found in the Bibliography.
2. Fires involving first ignition of interior content.
   
a. Each respective occupancy report includes a table or series of tables that record data “by Item First Ignited.” This analysis seeks to break down estimated annual data by enumerating the item or items that are first ignited during a recorded fire incident. The NFPA data records the number of fires, the number of civilian fatalities, and civilian injuries that are associated with the first ignition of each identified item, along with its relative percentage to the total number of estimated annual fires in the entire occupancy type. Additionally, this table indicates the direct property damage, in millions of dollars, associated with the first ignition of each identified item. Similarly, the NFPA records the relative percentage of the direct property damage to the total property damage in the occupancy type.

b. The author has examined the NFPA list of enumerated items first ignited for each occupancy type and identified those items that involve “interior space content” – those items that fall within the normal and customary purview and practice of an interior design practitioner as described in the language set forth in *Definition of Interior Design*, published in 2004 by the Council for Interior Design Qualification (CIDQ). The author then compiled the NFPA data on estimated number of fires, civilian fatalities, civilian injuries, and direct property damage for these specific items first ignited. A
complete listing of the items included by the author in this calculation can be found in Appendix B.

c. As noted in the discussion of annualized data above, the researcher relied upon the data in the NFPA tables. It is important to recognize that sums may not equal totals due to rounding procedures in the initial analyses of the NFPA. According to the NFPA:

An entry of zero may be a true zero or it may mean that the value rounds to zero. Percentages are calculated from unrounded values. It is quite possible to have a percentage entry of up to 100% even if the rounded number entry is zero. The same rounded value may account for a slightly different percentage share. Because percentages are expressed in integers and not carried out to several decimal places, percentages that appear identical may be associated with slightly different values."\(^\text{80}\) This is certainly the case with some of the data incorporated into this work; the author used all NFPA data as originally expressed.

3. Extent of Damage (Loss Beyond Floor of Origin)

a. The statistics in this portion of the analysis are based on NFPA tracking of estimated annual data by the “Extent of Flame Damage,” effectively determining the number of fire incidents and the associated losses by area of fire confinement. It is a way of determining the relative spread of fire damage and the losses in each area. Here the NFPA details the number of fires, civilian fatalities, civilian injuries, and direct property damage for

Fires that are confined to 1) the object of the fire origin, 2) the room of the fire origin, 3) the horizontal floor of the fire origin, 4) the building of fire origin, including floors other than that of the fire origin, and 5) spaces or buildings beyond the location of fire origin, including adjacent or surrounding structures. For the purposes of this study, the researcher compiled data on fire loss only beyond the initial floor of origin and included only losses that occurred some distance away from the initial area of the fire origin, be it elsewhere in the building and/or beyond.

The NFPA has modified a number of occupancy classifications since the original 2010 study was conducted. Where possible, the information was organized to allow comparison with the original work.

Findings

A detailed look at the fire data for specific occupancy types begins to provide perspective with regard to the frequency of fire occurrences. While the case study analysis above identified twenty-eight distinct fires of technical or educational significance that clearly implicated interior space content in the loss of 631 civilian lives and causing the injuries of 1,810 occupants, the annualized data describes in detail the estimated number of fires each year that occur in similar occupancies. Interior content in public and high-risk occupancies is responsible for more than 15,000 fires each year, claiming the lives of 218 civilians, injuring 1,043 more, and costing $263.5 million in direct property damage (see Figure 3.2).
Figure 3.2: Annualized Fire Data in Public and High-Risk Occupancies

Proving a causal relationship between interior space content and fire loss: annual averages for fires in public and high-risk occupancies indicate the relative frequency of incidents; fires in which interior space content is a first ignition source are a small percentage of total fires, but a high percentage of those that cause damage, injury, and death.

<table>
<thead>
<tr>
<th>Occupancy Type</th>
<th>Total Annual Fires (Avg)</th>
<th>Total Annual Deaths</th>
<th>Total Annual Injuries</th>
<th>Total Direct Property Damage (in millions)</th>
<th>Fires Involving First Ignition of Interior Space Content (Annual Average)</th>
<th>Extent of Damage (Loss Beyond Floor of Origin)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># of Fires</td>
<td>% of Total</td>
<td># of Fires</td>
<td>% of Total</td>
<td># of Fires</td>
<td>% of Total</td>
</tr>
<tr>
<td>Hotels/ Motels</td>
<td>3,700</td>
<td>12</td>
<td>143</td>
<td>$127.0</td>
<td>600</td>
<td>17%</td>
</tr>
<tr>
<td>Dormitories, Fraternities/ Sororities, Barracks</td>
<td>3,840</td>
<td>3</td>
<td>38</td>
<td>$20.9</td>
<td>240</td>
<td>6%</td>
</tr>
<tr>
<td>Religious and Funeral Properties Public Assembly Occupancies</td>
<td>1,890</td>
<td>1</td>
<td>12</td>
<td>$102.0</td>
<td>150</td>
<td>8%</td>
</tr>
<tr>
<td>Eating and Drinking Establishments</td>
<td>4,910</td>
<td>1</td>
<td>52</td>
<td>$94.3</td>
<td>330</td>
<td>7%</td>
</tr>
<tr>
<td>Educational Properties</td>
<td>6,290</td>
<td>0</td>
<td>85</td>
<td>$112.0</td>
<td>90</td>
<td>13%</td>
</tr>
<tr>
<td>Nursing Homes</td>
<td>2,840</td>
<td>5</td>
<td>110</td>
<td>$13.0</td>
<td>420</td>
<td>15%</td>
</tr>
<tr>
<td>Hospital or Hospice Facilities</td>
<td>1,600</td>
<td>1</td>
<td>29</td>
<td>$5.5</td>
<td>100</td>
<td>7%</td>
</tr>
<tr>
<td>Mental Health and Substance Abuse Facilities</td>
<td>1,450</td>
<td>1</td>
<td>23</td>
<td>$2.7</td>
<td>70</td>
<td>33%</td>
</tr>
<tr>
<td>Clinics and Doctors Offices</td>
<td>700</td>
<td>0</td>
<td>6</td>
<td>$18.7</td>
<td>80</td>
<td>11%</td>
</tr>
<tr>
<td>Residential Board and Care Facilities</td>
<td>1,920</td>
<td>10</td>
<td>61</td>
<td>$8.0</td>
<td>240</td>
<td>14%</td>
</tr>
<tr>
<td>Store/ Mercantile Facilities</td>
<td>16,360</td>
<td>13</td>
<td>242</td>
<td>$648.0</td>
<td>1,260</td>
<td>8%</td>
</tr>
<tr>
<td>Office Properties</td>
<td>3,830</td>
<td>4</td>
<td>37</td>
<td>$108.0</td>
<td>100</td>
<td>3%</td>
</tr>
<tr>
<td>Multi-Family Properties</td>
<td>108,490</td>
<td>410</td>
<td>4,280</td>
<td>$1,248.0</td>
<td>11,500</td>
<td>11%</td>
</tr>
<tr>
<td>Totals</td>
<td>163,340</td>
<td>463</td>
<td>5,233</td>
<td>$2,754.1</td>
<td>15,500</td>
<td>9%</td>
</tr>
</tbody>
</table>

Notes:
1. These are national estimates of fires reported to U.S. municipal fire departments and so exclude fires reported to Federal or state agencies or industrial fire brigades and included in NFPA statistical reports. The data, based on NFPA analysis, are estimated and are generally rounded. Fires are rounded to the nearest ten, civilian casualties are rounded to the nearest one, and direct property damage is rounded to the nearest million dollars. Direct property damage has not been adjusted for inflation. An entry of zero may be a true zero or it may mean that the value rounds to zero. Percentages are calculated from unrounded values. It is quite possible to have a percentage entry of up to 100% even if the rounded number entry is zero. Because percentages are expressed in integers and not carried out to several decimal places, percentages that appear identical may be associated with slightly different values.

Continued
2. Hotels/Motels include reported fires for the four-year period of 2006-2010. This category does not include residential hotels that serve as primary domiciles.
3. Dormitories, Fraternities, Sororities and Barracks include reported fires for the four-year period of 2006-2010, and include school, college and university dormitories, fraternity and sorority houses, monasteries, bunk houses, barracks, and nurses’ quarters or related properties.
4. Religious and Funeral Properties include reported fires for the four-year period of 2007-2011.
5. Public Assembly Occupancies include reported fires for the four-year period of 2004-2008, and include the following occupancy types: club; variable and fixed use amusement or recreation; library, museum, or court room; passenger terminal; theatre or studio; and unclassified or unknown-type public assembly property. Eating and drinking establishments and religious and funeral properties are excluded from these tallies and are included as separate line items in the chart.
6. Eating and Drinking Establishments include reported fires for the four-year period of 2006-2010.
7. Educational Properties include reported fires for the four-year period of 2005-2009, and include primary through high schools, college classroom buildings or adult education centers, day care centers, and unclassified educational properties. Although no detailed information was provided on first ignition of materials or extent of damage for unclassified educational properties, annualized data with regard to total number of fires, civilian fatalities, civilian injuries, and direct property damage are included in the first three columns.
8. Nursing Homes include reported fires for the four-year period of 2002-2005. Here, “nursing home” refers only to nursing homes licensed by the state providing 24-hour nursing care for four or more persons. Assisted living facilities and residential board and care facilities are not included here, but rather are listed in this chart “Residential Board and Care.” Similarly, elderly housing, where people cook for themselves and maintain their own apartments are considered residential and are therefore included under the heading “Multi-Family Properties.”
9. Hospital and Hospice facilities include reported fires for the four-year period of 2003-2006.
10. Mental Health and Substance Abuse facilities include reported fires for the four-year period of 2003-2006.
11. Clinics and Doctors’ Offices include reported fires for the four-year period of 2003-2006.
12. Residential Board and Care Facilities include reported fires for the four-year period of 2006-2010, and are defined by NFPA 101: Life Safety Code® as occupancies “used for lodging and boarding four or more residents not related by blood or marriage to the owners or operators for the purpose of providing personal care service.” In general usage, this property type can go by several names, including assisted living.
13. Store and mercantile properties include reported fires for the four-year period of 2004-2008, and include facilities providing personal services such as barber and beauty shops, laundry or dry cleaning shops, service stations, vehicle or other repair shops and businesses selling professional supplies or services.
14. Office properties include fires reported for the four-year period of 2004-2008. Office properties include general business offices, banks, veterinary or research offices, engineering, mailing firms and post offices.
15. Multi-Family Properties include fires reported for the four-year period of 2007-2011. The NFPA data identifies 210 civilian deaths in multi-family properties associated with the first ignition of upholstered furniture, cabinetry, and interior wall covering (excluding draperies). The author included these numbers in the column recording civilian deaths. However, since additional data on the total number of fires, civilian injuries, and property data as a result of the first ignition of these items was not included in the NFPA analysis and, therefore, is not included in the chart in the associated columns.

© Katherine S. Setser 2013. Data compiled from various statistical reports by occupancy, published by the National Fire Protection Association. See Bibliography for detailed listing of those reports.

That is, on average, each and every month, nearly 1,300 fires occur in public and high-risk occupancies that kill eighteen people, injure eight-seven, and cost nearly $22
million in direct property damage, not to mention the additional and substantial indirect costs not calculated here.

The percentage of fires in which interior content is a first ignition source represents nine percent of all fires in public and high-risk fires; the percentage of deaths (forty-seven percent) and injuries (twenty percent) where interior content is a first ignition source is much greater (see Figures 3.2 and 3.3).

**Figure 3.3: 2002-2005 Avg Annual Fires Involving the First Ignition of Interior Space Content**

Even though they represent a small number of overall fires in public and high-risk occupancies, when interior space content is a first ignition source, the risk of death and injury increase dramatically.

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To the point, if interior space content is a first ignition source, the risk of injury and death dramatically increases, particularly in those occupancy types that have been shown to present serious risk to the building occupants and/or that present the greatest
challenges in code compliance and enforcement over the useful life of the building. For example, interior space content is first ignited in only seventeen percent of the annual hotel/motel occupancy fires, yet those same fires are responsible for fifty percent of the resulting deaths and twenty-nine percent of the resulting injuries (see Figure 3.4). Similarly, nursing home fires that begin with the first ignition of interior space content represent only sixteen percent of the annual nursing home fires yet are responsible for forty percent of the annual civilian fire deaths and thirty-six percent of the injuries to civilians (see Figure 3.5). These numbers are significant since “[a]lmost half of all health care property fires occur in nursing homes (forty-six percent) as do most of the deaths (eighty-eight percent). Furthermore, nearly two-thirds (sixty-five percent) of the fire injuries in health care occupancies during the reported period (2002 to 2005) occurred in nursing homes.”

The list continues. Hospital and hospice facility fires that start with the first ignition of an interior finish or content item, just seven percent of the total annual facility fires, account for thirty-eight percent of civilian fire deaths and thirty-five percent of injuries to those civilian occupants (see Figure 3.6). The findings are consistent in mental health and substance abuse facilities: the first ignition of interior content is responsible for thirty-three percent of fires in these facilities, 100 percent of the resulting civilian deaths, and twenty-five percent of civilian injuries (see Figure 3.7).

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**Figure 3.4: 2006-2010 Average Annual Fires Involving the First Ignition of Interior Space Content: Hotels/Motels**

Interior space content is first ignited in only 17% of the annual hotel/motel occupancy fires, yet those same fires are responsible for 50% of the deaths, 29% of the injuries, and 10% of direct property damage.

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**Figure 3.5: 2002-2005 Average Annual Fires Involving the First Ignition of Interior Space Content: Nursing Homes**

Nursing home fires that begin with the first ignition of interior space content represent 16% of the annual nursing home fires yet are responsible for 40% of the annual civilian fire deaths, 36% of the injuries to civilians, and 12% of direct property damage.

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**Figure 3.6: 2003-2006 Average Annual Fires Involving the First Ignition of Interior Space Content: Hospital and Hospice Facilities**

Hospital/hospice facility fires that start with the first ignition of interior finish or space content represent 7% of the total annual facility fires, yet account for 38% of civilian fire deaths, 35% of civilian injuries, and 8% of direct property damage.

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**Figure 3.7: 2003-2006 Average Annual Fires Involving the First Ignition of Interior Space Content: Mental Health and Substance Abuse Facilities**

Interior space content is first ignited in 33% of mental health and substance abuse facilities, yet is responsible for 100% of the civilian deaths, 26% of the civilian injuries, and 32% of the direct property damage in those fires.

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**Figure 3.8: 2006-2010 Average Annual Fires Involving the First Ignition of Interior Space Content: Residential Board and Care Facilities**

Residential board and care facility fires that start with the first ignition of interior finish or content represent 11% of the total annual facility fires, yet account for 34% of civilian injuries, and 12% of direct property damage.

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**Figure 3.9: 2007-2011 Average Annual Fires Involving the First Ignition of Interior Space Content: Multi-Family Properties**

Interior space content is first ignited in only 11% of the annual multi-family property fires, yet those same fires are responsible for 50% of the deaths, 17% of the injuries, and 12% of direct property damage.

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In residential board and care facilities, first ignition of interior content is responsible for fourteen percent of all board and care fires, and thirty-four percent of the resulting injuries (see Figure 3.8). In multi-family properties, just eleven percent of annual multi-family fires begin with the first ignition of interior content, yet these fires account for fifty percent of the associated fire deaths and seventeen percent of the associated injuries (see Figure 3.9). Additionally, fires in apartment buildings, a major component of multi-family housing, account for forty-four percent of all high-rise fires, of particular risk to occupants because of the complications in evacuation and rescue.  

A more comprehensive measure of loss from substandard interior content is provided by an examination of the extent of flame damage. The ability to contain fire (to the object, the room, the horizontal floor of origin, or beyond) is an indicator of the speed at which fire, smoke, and toxic gases spread. The rates of flame spread and smoke development are determined in large part by the interior fuel load, consisting of wall, ceiling, and floor finishes; window treatments; moveable partitions; furniture, decoration, accessories; and other interior space content. Abnormal and improper fuel loads impede the ability of occupants to exit safely and can be devastating in the loss of life and property.  

For example, in Figure 3.2, two occupancy types, public assembly

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occupancies and multi-family properties, have a significantly higher proportion of deaths, 100% and 48%, respectively, that occur in spaces well beyond the origin of the fire incident even though the number of fires first ignited by interior space content in these occupancies is low, 12% and 7%, respectively (see Figures 3.10 and 3.11).

**Figure 3.10: 2004-2008 Extent of Damage: Loss Beyond the Floor of Origin: Public Assembly Occupancies**
Although 88% of annual public assembly occupancy fires are contained within the floor of origin, a full 100% of civilian deaths, 14% of civilian injuries, and 78% of direct property damage occur on other floors or beyond.

**Figure 3.11: 2007-2011 Extent of Damage: Loss Beyond the Floor of Origin: Multi-Family Properties**
Although 93% of annual multi-family property fires are contained within the floor of origin, 48% of civilian deaths, 23% of civilian injuries, and 70% of direct property damage occur in spaces or on floors beyond.

In nearly all cases, direct property damage from fires outside of the floor of origin is extensive. As illustrated in Figures 3.12, 3.13, and 3.14, significant damage and loss may be attributed to the spread of fire by inferior interior space content.
Fighting Fire with Fire:
Redefining the interior design value proposition

**Figure 3.12:** 2006-2010 Extent of Damage: Loss Beyond the Floor of Origin: Hotels/Motels

Although 93% of annual hotel/motel fires are contained within the floor of origin, 30% of civilian deaths, 18% of civilian injuries, and a full 80% of direct property damage occur in spaces or on floors beyond.

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**Figure 3.13:** 2002-2005 Extent of Damage: Loss Beyond the Floor of Origin: Nursing Homes

Although 99% of annual nursing home fires are contained within the floor of origin, 23% of civilian deaths, 8% of civilian injuries, and 59% of direct property damage occur in spaces or on floors beyond.

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Figure 3.14: 2003-2006 Extent of Damage: Loss Beyond the Floor of Origin: Mental Health and Substance Abuse Facilities

Although 98% of annual mental health and substance abuse facility fires are contained within the floor of origin, 31% of civilian deaths, 8% of civilian injuries, and 52% of direct property damage occur on other floors or beyond.
Comparison to Previous Study

A comparison of this most recent analysis (see Figure 3.2) to similar data compiled during the 2010 study covering NFPA national estimates of fires reported to United States municipal fire departments during the four-year period from 1999 to 2002 (see figure 3.15) appears to confirm the initial 2010 findings by indicating the continuation of a general trend over the period of time.\(^{84}\)

Although a comparison based on the annual totals from a single four-year period since the 2010 study period is impossible due to the date spreads of the latest data available from the NFPA, comparison by individual occupancy type is revealing:

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### Figure 3.15: 1999-2002 Annualized Fire Data in Public and High Risk Occupancies


<table>
<thead>
<tr>
<th>Occupancy Type</th>
<th>Total Annual Fires (avg)</th>
<th>Fires Involving First Ignition of Interior Content (annual average)</th>
<th>Extent of Damage (Loss Outside Floor of Origin)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Annual Fires</td>
<td>Civilian Deaths</td>
</tr>
<tr>
<td>Rooming Boarding/ Lodging</td>
<td>1,830</td>
<td>370 (20%)</td>
<td>8 (92%)</td>
</tr>
<tr>
<td>Hotels/Motels</td>
<td>4,550</td>
<td>1,110 (24%)</td>
<td>4 (25%)</td>
</tr>
<tr>
<td>Dormitories, Fraternities/ Sororities &amp; Barracks</td>
<td>2,340</td>
<td>310 (13%)</td>
<td>3 (100%)</td>
</tr>
<tr>
<td>Religious &amp; Funeral Properties</td>
<td>1,760</td>
<td>260 (15%)</td>
<td>1 (100%)</td>
</tr>
<tr>
<td>Public Assembly Occupancies</td>
<td>3,890</td>
<td>490 (13%)</td>
<td>2 (100%)</td>
</tr>
<tr>
<td>Eating &amp; Drinking Establishments</td>
<td>9,910</td>
<td>600 (6%)</td>
<td>6 (0%)</td>
</tr>
<tr>
<td>Educational Properties</td>
<td>7,070</td>
<td>640 (0%)</td>
<td>[1]</td>
</tr>
<tr>
<td>Care for Aged Facilities</td>
<td>3,680</td>
<td>560 (15%)</td>
<td>3 (27%)</td>
</tr>
<tr>
<td>Health Care Facilities</td>
<td>3,150</td>
<td>350 (11%)</td>
<td>0 (0%)</td>
</tr>
<tr>
<td>Store/Mercantile</td>
<td>17,200</td>
<td>2,000 (12%)</td>
<td>1 (11%)</td>
</tr>
<tr>
<td>Office Properties</td>
<td>4,900</td>
<td>460 (9%)</td>
<td>3 (30%)</td>
</tr>
<tr>
<td>Multi-Family Properties</td>
<td>91,300</td>
<td>9,800 (11%)</td>
<td>100 (3%)</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>151,580</strong></td>
<td><strong>16,950 (12%)</strong></td>
<td><strong>183 (32%)</strong></td>
</tr>
</tbody>
</table>

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84 Figure 3.15 is reproduced from chart in “Through the Cracks: Failures in the Implementation of Fire and Life Safety Standards in the Selection, Specification, and Installation of Interior Content,” in The State of the Interior Design Profession, edited by Caren S. Martin and Denise A. Guerin. Data in the 2010 study exclude the events of September 11, 2001. Like the current data being examined, fires reported only to federal or state agencies or industrial fire brigades are excluded. Fires are rounded to the nearest ten and direct property damage is rounded to the nearest hundred thousand dollars. Property damage has not been adjusted for inflation.
1. *Hotel/Motel Occupancies.* Despite the fact that the average annual number of fires in hotel/motel occupancies over the four-year period of 2006 to 2010 fell by nearly nineteen percent from the 2010 study period of 1999 to 2002, and an even greater reduction in hotel/motel fires involving the first ignition of interior space content – nearly thirty percent – losses from fires involving first ignition of interior space content take on an even greater significance. Annual civilian deaths associated with fires involving the first ignition of interior space content increased by 100 percent. During the same time frame, annual civilian injuries dropped by six percent and direct property damage was reduced by more than half. Damages from flame spread outside of the immediate area and floor of the fire origin remained similar between the two comparative time periods: thirty percent of annual civilian deaths occurred beyond the floor of origin in the period from 2006 to 2010, compared with thirty-eight percent in the period from 1999 to 2002; eighteen percent of annual civilian injuries occurred beyond the floor of origin from

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85 There were an estimated 4,550 total annual fires in hotel/motel occupancy types during the period of 1999 to 2002 and estimated 3,700 total annual fires in hotel/motel occupancies during the period of 2006 to 2010.

86 From 1999 to 2002, 24% of the estimated annual fires in hotel/motel occupancies involved the first ignition of interior space content. In the period of 2006 to 2010, that same number decreased to 17%.

87 Civilian deaths in fires involving the first ignition of interior content increased from twenty-five percent in the period 1999 to 2002 to fifty percent from 2006-2009.

88 Civilian injuries in fires involving the first ignition of interior content decreased to 29% from the 2006 to 2010 time period to 31% from 1999 to 2002.

89 Direct property damage decreased to 10% from the 2006 to 2010 time period from 22% from 1999 to 2002.
2006 to 2010, down slightly from twenty percent in the period from 1999 to
2002.

2. Dormitories, Fraternities, Sororities, Barracks. This occupancy category is
one of the few occupancy groups in which, in spite of improvements in code
requirements, the number of annual fires is on the increase – a forty percent
increase from the period of the initial study (1999 to 2002) to the most
recently available data (2006 to 2010), due largely to significant changes in
such properties in recent years.\textsuperscript{90} “In the past, dormitories did not have
kitchens in the individual units. Many of today’s dormitories more closely
resemble apartment buildings with suite style apartments that include
kitchens. The distinction between apartments and dormitory properties is now
quite blurred.”\textsuperscript{91} Fortunately, in the period between 2006 and 2010, there
were deaths or injuries associated with these fires, a reduction from three
deaths and twenty-nine injuries annually during the 1999 to 2002
measurement period. Despite the apparent reduction in loss, case studies
illustrate the inherent danger from fire in dormitory-type occupancies. The
very fact that fires in these occupancies are on the rise is cause for concern.

Furthermore, while the 2006 to 2010 estimates of the extent of damage

\textsuperscript{90} The NFPA estimated total annual fires in dormitories, fraternities, sororities, and barracks for
the years 1999 to 2002 is 2,340. For the four-year period of 2006 to 2010, the total number of fires in this
occupancy type is estimated at 3,840.

\textsuperscript{91} Ben Evarts, \textit{Structure Fires in Dormitories, Fraternities, Sororities and Barracks: August 2011}
(Quincy, MA: National Fire Protection Association, 2011), 1, accessed June 28, 2013,
http://www.nfpa.org/assets/files//MbrSecurePDF/OS.Campus.PDF.
beyond the area or floor of origin appears low due to the overall reduction in fire casualties during this period, more than three quarters of all direct property damage from flame spread occurred outside the area and floor of origin – seventy-six percent – a clear indicator that interior space content remains a significant threat to occupants of dormitories, fraternities, sororities, and barracks.

3. **Public Assembly Occupancies.** Similar to the fires in dormitories, fraternities, sororities, and barracks noted above, the number of annual fires in these occupancies has increased between the study periods. Like the dormitory-type fires, there has been a fortunate reduction in civilian deaths and injuries.\(^92\) However, as in the dormitory occupancy fires noted above, 100 percent of the annual civilian deaths in the period between 2006 and 2010 occurred outside the area and floor of the fire origin, an increase of fifty percent in the previous period. As discussed previously, such flame damage beyond the area of the incident origin is a direct outcome of the application of substandard interior finish and other space content. Although annual civilian injuries outside the floor of fire origin were reduced significantly from the

\(^{92}\) For the four-year period of 1999 to 2002, there are 3,890 estimated annual fires in public assembly occupancies. In the four-year period of 2006 to 2010, the number of estimated fires increased by 21%, to 4,910 fires annually. Civilian deaths from fires involving the first ignition of interior materials dropped from two per year for the period 1999 to 2002 to zero from 2006 to 2010; civilian injuries dropped by 57%, from fourteen annually from 1999 to 2002 to six annually from 2006 to 2010.
previous period, a daunting seventy-eight percent of all direct property
damage in this occupancy type occurred beyond the floor of the fire origin.93

4. *Eating and Drinking Establishments*. The annual fire data in eating and
drinking establishments between the two comparative reporting periods
remains relatively consistent. While only four percent of fires involved the first
ignition of interior space content is estimated for the most recent period from
2006 to 2010, down from six percent from 1999 to 2002, both periods
generated zero statistical civilian deaths associated with such fires. However,
injuries to civilians more than doubled between the two periods, to eight
percent annually from 2006 to 2010 from three percent in the earlier period.
Furthermore, while only twenty-two percent of the deaths occurred beyond
the floor of fire origin in the period from 2006 to 2010, a reduction from 100
percent from the earlier period, the injuries remained unchanged at nineteen
percent. It is important to note that eighty-two percent of all direct property
damage associated with fires in eating and drinking establishments extends
beyond the floor of the fire origin, a reminder once again of the impact of
interior finish and content that fuels the spread of flame, smoke, and toxic
gas.

5. *Nursing Homes*. There is no direct correlation between the current nursing
homes occupancy from the earlier 2010 study since the categories used in
the NFPA earlier statistical analyses were categorized and calculated

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93 Annual civilian injuries beyond the floor of fire origin was reduced by 39% during the four-year period of 2006 to 2010, from 23% in the 1999 to 2002 period to 14% during 2006-2010.
differently. However, some comparison is possible. In the current category of “nursing homes,” reported during the four-year period from 2002 to 2005, fifteen percent of annual nursing home fires involved the first ignition of interior space content. Forty percent of annual civilian deaths and thirty-six percent of annual civilian injuries in the related fires were also the result of fires that involved the first ignition of interior finishes and space content. In the previous study category of “care for aged facilities,” calculated during the period from 1999 to 2002, a similar number of annual fires – fifteen percent – involved the first ignition of interior space content. Only twenty-seven percent of annual civilian deaths and forty-one percent of annual civilian injuries were associated with the first ignition of interior content. When comparing the extent of damage in the two related categories, interior space content, once again, has a significant impact on loss. Twenty-three percent of the estimated annual civilian deaths and eight percent of the estimated annual civilian injuries were found beyond the area and floor of the fire origin in the recent nursing home data. In the previous study of care for aged facilities, zero deaths and five percent of civilian injuries annually were a result of flame spread beyond the floor of the fire origin. Fifty-nine percent of all damage in nursing home facilities during the reporting period from 2002-2005 was a result of flame spread beyond the floor of the fire origin.

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94 The 2010 study did not include a category for nursing homes. Rather, a category called “care for aged facilities” was listed that included nursing homes but also related residential board and care facilities.
6. *Hospital or Hospice Facilities, Mental Health and Substance Abuse Facilities, and Clinics and Doctor’s Offices.* A statistical comparison of these occupancies with data from the 2010 study is not possible, since the NFPA occupancy categorization differed from the most current data available. However, a broad comparison is helpful in understanding the general trend. A similar category used in the 2010 study, “health care facilities,” included occupancy types similar to hospital and hospice facilities, facilities for the care of mental health patients, and clinics and doctor’s offices. Annualized data from the original study, calculated from data collected during the four-year period from 1999 to 2002, indicated that eleven percent of annual fires in health care facilities involved the first ignition of interior space content. Although the hospital and hospice care facilities annualized rates are a bit lower, seven percent for the period from 2003 to 2006, eleven percent of the fires in clinics and doctor’s offices annually are associated with the first ignition of interior content, and an estimated thirty-three percent fires in mental health and substance abuse facilities involve the first ignition of such materials. The 1999 to 2002 annualized calculations for health care facilities anticipates forty-one percent of civilian injuries are associated with the first ignition of interior space content. In the 2003 to 2006 calculations, thirty-five percent of annual fires in hospital and hospice facilities, twenty-seven percent of annual fires in clinics and doctor’s offices, and twenty-six percent of annual fires in mental health and substance abuse facilities have a direct correlation.
to the first ignition of interior space content. When comparing the extent of damage, it appears that interior finish and content continues to be an area of concern in the protection from loss. The 1999 to 2002 annual estimates indicate zero percent of deaths and five percent of civilian injuries occur annually beyond the floor of the fire origin. In the most recent calculations (2003 to 2005), thirty-one percent of civilian deaths and eight percent of injuries to civilians take place beyond the area and floor of the initial fire incident.

7. *Multi-Family Properties.* There has been a fourteen percent increase in the number of annual fires in multi-family properties between the initial 2010 study reporting period from 1999 to 2002 and the most current NFPA data from the four-year period from 2007 to 2011. Although there is no change in the number of multi-family fires that involve the first ignition of interior space content, eleven percent for both reporting periods, there is a distinct increase in the civilian deaths associated with those fires that result from the ignition of interior finish(es) or interior space content item(s). That is a ninety-four percent increase: from three percent annually in the 1999 to 2002 reporting period up to fifty percent in the most recent data available. Civilian injuries in those same fires has remained relatively consistent, seventeen percent annually in the most recent reporting period, down slightly from nineteen percent in the 1999 to 2002 data. There is also a significant increase in the loss that takes place far from the origin of the fire, indicating dangerous
spread of fire and smoke beyond the area of the incident. Forty-eight percent of annual civilian deaths, an increase of thirty-five percent from the 1999 to 2002 reporting period occur on a floor beyond the fire origin. Civilian injuries, twenty-three percent annually, remain consistent between the two reporting periods.

Other categories listed, religious and funeral properties, educational properties, and store/mercantile facilities are not called out specifically because they display similar trends between the reporting periods, assuming natural annual variations that are consistent with general fire occurrences over time. Rooming, boarding/lodging facilities, included in the original 2010 study but not addressed here, is no longer a separate category tracked by the NFPA data, but rather is embedded the data of other occupancy types.

**Summary Conclusion**

There is an obvious and general trend in most occupancy types that involves an overall reduction in the annual number of fires, and, in some cases, the number of deaths and injuries annually. It is important to note that these improvements can be accounted for by general improvements in building and life safety codes, the increased prevalence of sprinkler systems, alert systems, etc. However, the case study and annualized fire data continue to indicate an ongoing trend toward a distinct causal relationship between interior finish material and interior space content and the loss of life and property, a significant step toward a clear and well-articulated value proposition.
Based on the evidence presented herein, it seems likely that the interior design profession may well frame a valid and demonstrable argument that there is considerable value to the general public in the practice of interior design, and that its value may be clearly stated in direct relation to the cost – or risk of harm to the public – when interior space content is not provided by a qualified practitioner. The evidence assembled by the NFPA and examined here provide evidence of dozens of representative incidents and concrete data that inadequate selection, specification, arrangement, and/or installation of interior space content has the potential to cause, and, in fact, has caused, serious, irreparable harm.
Does the structure of our existing system of life- and fire-safety codes and the requirement for licensing of architects and engineers as overseers of construction mitigate the risk to the public?

Is the interior design profession prepared to share the mantle of public health, safety, and welfare?

(Mis)Alignment of Mitigation | Current Interior Design Content Delivery System

Current Oversight of Interior Design Content Delivery

There is a common belief that, even though interior space content may pose a hazard to the health, safety, and welfare of the public in high-risk occupancies, the risk of harm is mitigated by the participation of licensed professionals and code officials within the existing regulatory environment. The positions taken by the American Institute of Architects (AIA) are symptomatic of this view. Its public policy position with regard to the “Design of Structures for Human Occupancy or Use” states:

The AIA maintains that to protect the health, safety, and welfare of the public, only architects should program and design all structures primarily intended for human occupancy or use. Architects are uniquely qualified through education, experience, examination, and practice to lead the design process to design buildings. The process of planning and designing the construction of buildings is complex, so sound professional judgment of an architect is needed
before and throughout the design process and in construction. Therefore, it is incumbent on each jurisdiction that has a responsibility to the health, safety, and welfare of its citizens to ensure that the architect is engaged early in planning and managing the design of buildings. (approved March 2013, through December 31, 2015)\(^1\)

The AIA further reinforces its dominance with regard to other potentially competing professions that practice in the built environment:

In the public interest, the AIA holds that only architects and engineers licensed through examination possess the necessary education, training and experience to protect the health, safety and welfare of the public in the built environment. Other individuals may possess useful skills in designing within the built environment, but fragmentation of responsible control of the building design process endangers and misleads the public as to respective areas of competence and expertise. The AIA opposes practice or title regulation of individuals or groups other than architects and engineers for the design of buildings. (approved March 2013, through December 31, 2015).\(^2\)

Regardless of the AIA’s formal positions-taking in the sphere of architectural practice, the built environment is not quite this simple nor the architects’ scope of services and knowledge often this comprehensive.

**Jurisdictional Limitations of Regulatory Authorities**

There is a typical and customary regulatory path for new construction and substantial building renovation: a) construction documents, including plans and

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\(^2\) Ibid., 6.
specifications, are completed and signed and sealed by a licensed architect or engineer, or other licensed design professional; b) application is made to a jurisdiction for a permit for construction, which includes review of documents by state and/or code enforcement officials for compliance of regulations relating to zoning, site, building codes, fire codes, public works requirements such as sidewalks, curbs, and ramps, water and sewer availability and floodplain requirements, and, depending on the project and its location, historic district requirements, health department regulations, or other responsibilities under the law; c) issuance of a building permit; d) periodic construction site inspection by various codes enforcement officials for compliance with codes, ordinances, and other requirements; and, upon approval of all inspecting officials, e) the issuance of a Use and Occupancy Certificate allowing users to inhabit the building.

There are, of course, variations in requirements based on each jurisdiction’s unique culture and circumstance; however, the process is similar throughout the United States, due largely to the consistency of building code language. A comparison of two jurisdictions, the Metropolitan Government of Nashville and Davidson County, Tennessee, a state in which the title of interior design is regulated by the state, and the City of New Orleans, Louisiana, a state in which the practice of interior design is regulated, will serve as a launching point for examination and discussion of the effectiveness of regulatory coverage with respect to interior space content.

Chapter 16, Section 28.101 of *The Code of the Metropolitan Government of Nashville and Davidson County, Tennessee* states,
It shall be the duty of every person desiring to construct, alter, repair, enlarge, move or demolish any building or structure or part thereof or any appurtenances connected or attached thereto, or to install any heating, air conditioning or ventilating system or unit or any equipment, device, appliance or fixture, required or governed by this chapter, or to repair or replace any damage to a building or structure caused by termites, or to erect or construct any sign, billboard or similar structure governed by this chapter, or to do or cause any such work to be done, for which a permit is required, to first make application to the director of codes administration and obtain the required permits therefor, except as such may be specifically excluded by Section 16.04.020.3

The reach of the Tennessee code is extensive. It seeks to cover every act relating to buildings within in the jurisdiction, be it new construction or alteration of any kind. The exceptions referred to in the opening clause cited above and listed under Section 16.04.20 include the erection, construction, repair, alteration, or maintenance of any farm accessory buildings or structures located on farmsteads in excess of five acres and that lie within a properly zoned agricultural or rural district.4

Nashville requires the submission of site plans and building plans for all new structures and building additions. For renovations and changes of occupancy, building plans, but no site plans, are required. At minimum, Nashville requires that the building plans include a cover sheet (listing building height, building stories, building area, tenant area square footage, construction type, type of occupancy, referenced codes and

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4 Ibid.
relevant editions, sprinkler system type and design loads); foundation plan; dimensioned floor plan(s); roof plan, framing plan(s); finish plan; door and window schedule; plumbing drawings; mechanical drawings; and electrical drawings.\(^5\) When the scope of work is of substantial in size, the drawings must be prepared by qualified professionals:

All building plans must be sealed by an architect or engineer that is licensed in the state of Tennessee, if any of the following apply:
1. The building is 3 stories or more in height,
2. The building is 5000 sq. ft. or more in area,
3. The building is classified as an educational occupancy (child care of six or more children for less than 24 hrs. and schools through the 12\(^{th}\) grade),
4. The building is classified as an assembly occupancy (50 or more people can congregate in any one room for civic, social, religious, recreation, food and drink consumption or to await transportation),
5. The building is classified as an institutional assembly (nursing home, hospital, detoxification facility, etc.),
6. The building plans have a title block or any information that indicates that either an architect or an engineer prepared them. Only Interior Designers are exempt. A licensed Tennessee land surveyor must seal all site plans.\(^6\)

The Tennessee law holds all participants in the construction or renovation responsible to meet building, life safety and accessibility codes, however, it is the building permit that becomes the initial operational mechanism for regulatory oversight; the permit application process and the documents required to make application for a building permit allows the regulatory agencies to a) ensure the involvement of expressly


\(^6\) Ibid., 1.
trained professionals, and b) evaluate the proposed work prior to its installation. Further, the requirement for periodic inspections by various code officials during construction provides both leverage to promote compliance as well as an opportunity to confirm the work meets jurisdictional standards. In that the required submittals are extensive, and include a finish plan to assess the intended application of interior finish materials, the system appears relatively effective for oversight of new construction and extensive renovation with regard to interior finish and interior space content. Clearly under the law in Tennessee, interior designers providing services to clients in new construction, the construction of additions, or significant renovation projects, particularly those that involve a change in occupancy classification, must do so under the direct supervision of a state licensed architect or engineer. While it is not necessary for an interior designer to submit all projects completed with the designer’s professional title block for a building permit, as indicated by the exemption for interior designers cited above, it is clear that in any participation by interior designers or others in the building design, the documentation for new construction and significant renovation must be completed under the direct supervision of a state registered architect or engineer.

7 Title 62, Chapter 2 of the Tennessee Code Annotated sets forth laws and procedures that regulate the profession of architects, engineers, landscape architects, and interior designers. Section 62-2-306 prohibits architects and engineers from affixing the registrant’s seal on to any document that has not been prepared by the registrant – the architect or engineer – or prepared “under the registrant’s responsible charge” (p. 9). The Rules of State Board of Architectural and Engineering Examiners, Chapter 0120-20 Rules of Professional Conduct, March, 2013 (Revised) further defines Section 0120-02-07 Misconduct, that a registrant “may not take over, review, revise, or sign or seal drawings or revisions thereof when such plans are begun by persons not properly registered and qualified…” (p. 5). Moreover, Section 0120-02-.08 Seals clarifies that, “Plans, specifications, drawings, reports or other documents will be deemed to have been prepared under the responsible charge of a registrant only when…2. The registrant supervises and is involved in the preparation of the plans, specifications, drawings, reports or other documents and has input into and full knowledge of their preparation prior to their completion; 3. The registrant reviews the final plans, specifications, drawings, reports or other documents…” (p. 7).
Oversight of interior space content is less than effective in small projects or in projects that do not involve new or substantial construction. For example, Chapter 16, Section 28.030 of The Code of the Metropolitan Government of Nashville and Davidson County, Tennessee is very clear – and it is reiterated elsewhere on the official Codes Administration website – that permits are not required in instances of “normal maintenance repair”, defined in the code as “repairs to an existing building or structure, including but not limited to exterior and interior painting, papering, glazing of windows and doors, floor finishing, minor repairs to chimneys, porches, underpinning, and repairs to an existing roof not to exceed thirty-three percent of the roof area.” As examined in Chapter Three, highly combustible interior finish on walls, especially extensive use of wallcovering, wood paneling, and carpeting, especially in egress corridors, is expressly implicated in the loss of life and property (see Figure 3.1).

Under the law in Tennessee, buildings that are less than three stories in height and less than 5,000 square feet in area, and classified as an occupancy type other than educational, assembly, or institutional assembly, building permits may be obtained by property owners or properly licensed contractors. Additionally, a scope of work with an anticipated cost of less than $25,000 need not be constructed or installed by a state-licensed contractor. For single- or two family residences under 5,000 square feet, only a site plan is required for new construction; construction plans are not typically required in

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9 Rick Harris (plans examiner for Metropolitan Nashville and Davidson County, Tennessee) in phone interview with the author, July 17, 2013.
order to obtain a permit for construction or demolition.10 For commercial building projects that are less than three stories in height and less than 5,000 square feet in area, and classified as an occupancy type other than educational, assembly, or institutional assembly, building permits may also be obtained by the property owners or properly licensed contractors.11 Construction plans are typically required for new construction and substantial renovation of commercial buildings and are subject to the laws governing the preparation of construction documents by state licensed professionals: projects of 5,000 square feet in area or more, or more than three stories in height, or classified as an educational, assembly, or institutional assembly must be prepared by or under the direct supervision of a licensed architect or engineer. The plans examiner reserves the right to determine what constitutes a “plan” in projects less than 5,000 square feet and may, in some instances, allow a detailed written scope as a substitute for a drawing.12 Finish plans and/or product data regarding interior finish or furnishings are rarely part of the submission.13

Such procedures and exemptions mean that interior finish and space content may be installed without any oversight at all. Even work required by law to be inspected by jurisdictional authorities during construction is unlikely to be thoroughly reviewed for

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11 Rick Harris (plans examiner for Metropolitan Nashville and Davidson County, Tennessee) in phone interview with the author, July 17, 2013.

12 Ibid.

13 Ibid.
compliance with the codes and other regulations. It is often impossible to determine from visual inspection only whether interior materials meet quality and/or performance standards. Furthermore, work that is concealed by construction activities at the time of inspection makes complete evaluation impossible. Once again, the numerous examples of multiple layers of wallcovering, paneling, and other highly combustible interior finish materials come to mind (see Figure 3.1).

Procedures and requirements surrounding new construction in the City of New Orleans, Louisiana are quite similar to those in Metropolitan Nashville and Davidson County, Tennessee. The New Orleans Building Codes states, in part:

> ...any owner, authorized agent, or contractor who desires to construct, enlarge, alter, repair, move, demolish, or change the occupancy of a building or structure, or to erect or construct a sign of any description, or to install or alter fire extinguishing apparatus, elevators, engines, or to install a steam boiler, furnace, heater, incinerator, or other heat producing apparatus or other apparatuses, the installation of which is required by this code, or to cause any such work to be done shall first make application... and obtain the required permit for the work.\(^\text{14}\)

Like the example from Metropolitan Nashville and Davidson County, Tennessee, the language applies broadly to all "construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to

such buildings or structures.\textsuperscript{15} And, like the example from Nashville, the City of New Orleans requires an owner or contractor to make application for a building permit and submit complete plans, stamped with “live seals from a Louisiana licensed architect or civil engineer” prior to commencing construction as a means of regulatory oversight, ensuring the involvement of trained design professionals and the opportunity for formal evaluation of the proposed work by regulatory authorities prior to its installation.\textsuperscript{16}

For new construction, additions to existing buildings and substantial renovations or improvements where the work will exceed fifty percent of the value of the structure, applicants must submit a plot plan, architectural plans, including detailed foundation drawings stamped by a Louisiana registered architect or civil engineer, and a recent benchmark certificate stamped by a registered land surveyor, among other required documents.\textsuperscript{17} There is no specific mention in the building permit application requirements of plans or other information that expressly detail interior finish or content items to be


\textsuperscript{16} City of New Orleans, \textit{Building Permits and Licenses: Construction: New Construction – Building Permit}, last updated March 19, 2013, accessed July 4, 2013, http://www.nola.gov/onestop/building/construction/new-construction-%28building%29-permit/. The term “live seals” refers to original stamps issued and signed by a licensed professional and indicates that duplicate seals or signature are not acceptable. Like the laws governing the practice of architecture and engineering in the state of Tennessee, Louisiana state \textit{Licensing Law R.S. 37, Chapter 3, as Mended June, 2012} provides that an architectural or engineering registrant in the state “shall not...[a]ffix his seal or stamp or name to any specification, drawing or other related document which was not prepared by him or under his responsible supervision and control, or permit his seal, stamp, or name to be affixed to any such document” (p. 8-9).

included in the scope of the work; however, the definition of “architectural plans” to be submitted includes “complete plans of the building completely detailing the work” and could be interpreted to require such information in the submittals.\textsuperscript{18} These same submittals are required when applying for a “structural renovation permit” for renovations to an existing building that include modifications to a foundation, beams, load-bearing walls, and other structural members, providing reasonable assurance of regulatory oversight in new or substantial renovation projects.\textsuperscript{19}

Surveillance is less effective on smaller and less complex renovation projects. According to New Orleans law, additions to existing buildings or renovations or improvements where the work will not exceed fifty percent of the value of the structure, plans are not required for review prior to construction. Although those responsible for the construction are still accountable for following building codes and other regulatory requirements, the effectiveness of on-site regulatory inspections, if they occur, is considerably reduced since the quality of many finish products cannot be established by visual means, and work that is concealed at the time of inspection cannot be properly evaluated.

For any non-structural construction or changes of use within an existing building in the City of New Orleans, interior or exterior, applications are reviewed by a permit

\textsuperscript{18} Ibid.

analyst and often issued the same day.\textsuperscript{20} Although plans are not usually required for residential projects, they are generally required for commercial projects. When required, complete plans stamped with “live seals” from a Louisiana licensed architect or civil engineer are mandatory. It is particularly interesting that in a state that fully recognizes the profession of interior design, and regulates its practice, that an interior design professional is not considered a licensed design professional in the preparation of documentation for non-structural renovation work in the City of New Orleans.

Like the Metropolitan Nashville and Davidson County, Tennessee regulations, The \textit{Building Code of The City of New Orleans, Louisiana} offers an exemption for items that fall under the category of normal maintenance and repair of buildings. Although the City of New Orleans does not use or define a specific term for this category of items, it lists specific exemptions from the building permit process:

\begin{quote}
A building permit shall not be required for the following, unless in the opinion of the Director it involves hazardous or complex conditions which require permitting and inspection:

(1) Removal and replacement of deteriorated weather boards, aluminum or vinyl siding.
(2) Removal and replacement of deteriorated floor boards.
(3) Removal and replacement of deteriorated porches and steps – front and rear and sides, when not in conflict with the Zoning Ordinance.
(4) Interior painting, papering and similar finish work.
(5) Paving of yard when in compliance with applicable Zoning Ordinance.
(6) Retaining walls which are not over three (3) ft. in height.
\end{quote}

Included in this list is the removal and replacement of deteriorated flooring, interior painting, papering and similar finish work, work that has consistently contributed to the loss of life and property (see Chapter Three).

In addition, laws governing architectural and engineering practice outline exemptions from the requirement to engage a licensed architect or engineer in the planning and preparation of certain construction projects, further reducing the oversight reach of projects involving the selection, specification, installation, and maintenance of interior space content. Subsection 155 Exemptions of Licensing Law R.S. 37, Chapter 3, as Amended June, 2012, indicate that unlicensed individuals may act as designers for:

(a) Single family residences.
(b) Buildings or projects that are to be constructed for personal use, provided such buildings are not intended, or adaptable for public employment, assembly, or other occupancy by the public,
(c) Renovations or alterations of any size building which do not affect the structural integrity, or life safety, exclusive of building finishes and furnishings, or which have been pre-approved by the state fire marshal where life safety is affected and does not exceed one hundred and twenty-five thousand dollars. “Life safety” as used in this Subsection shall be governed by the interpretation of the

state fire marshal in accordance with the authority of R.S. 40:1561 et seq.
(d) New buildings and buildings with changes in occupancy classifications which do not exceed the gross floor areas stated in Subsection (f) of this Section.
(e) Building additions that do not cause the gross floor areas to exceed those in Subsection (f) of this Section.
(f) (i) Occupancy Classifications and Gross Floor Area Sq. Ft
Storage 6250
Factory and Industrial 5000
Mercantile 4000
Residential 4000
Education 2500
Institutional 2500
High Hazard 1500
Assembly 2650
Business 4000
Utility and Maintenance 5000
(ii) Occupancy classifications and gross floor areas as defined in the current editions of the codes which comprise the state uniform construction code and which are identified in R.S. 40:1730.28

Subsection 155 Exemptions of Licensing Law R.S. 37, Chapter 2, as Amended June, 2012 indicates that “Routine maintenance projects” that do not exceed the contract limit for public bidding are also exempt from the requirement to be designed by a state licensed architect or engineer.23

It bears noting that neither jurisdiction expressly indicates a requirement for the submission or examination of furnishing plans by codes officials, especially in commercial occupancies where substantially immovable open office furnishings systems

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23 Ibid.
are not only common, but are also pose potential dangers to occupants due to their intensified fuel loading (exemplified in the losses in the First Interstate Bank Building fire in Los Angeles, see Chapter Three) and the ability of such systems to act as plausible impediments to egress access, both physical and visual. Nor does either jurisdiction have a requirement that furniture installation plans be provided by a qualified, registered design professional. Even in the state of Louisiana, a state that regulates the practice of interior design, the retail installation or delivery of services pursuant to selling, selecting, or assisting in selecting furnishings or fixtures for interior spaces are considered “Decorator services” and are therefore exempted from regulation under the 1999 interior design statute. It becomes another example of unmitigated risk to the public.

Frequency of Incremental Change

As discussed in Chapter Two, two of the five most “critical issues” deemed responsible for the high fire mortality rate in the United States focus squarely on the issue of the incremental change of interior space content: a failure of standards to control building content, particularly when incremental occupancy or use changes occur, and modifications to interior space content in existing buildings that are governed by outmoded codes until significant alterations trigger implementation of new and current

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The evidence is clear that such small, incremental modifications implemented by untrained participants can have severe repercussions. Flame spread, smoke generation and toxicity, accessibility, and egress obstruction, material off-gassing, moisture migration and mold growth, inappropriate application of materials, project completion and occupancy delays, unanticipated project “extras” which impact the budget and schedule, unsustainable design decisions, etc. are sources or risks of harm which may fall through the regulatory review cracks. Although the existence of the codes and other statutory regulations are intended to protect the public in advance of a tragedy, and every participant in the construction, renovation, and maintenance of interior finishes and content are required to follow the law, e.g., minimum flame spread ratings, smoke toxicity requirements, etc., the reality is that there is little assurance that the work and/or the interior products installed meet regulatory requirements. As is evident from the examination of the customary regulatory path for construction oversight above, most small projects and nearly all remedial replacement of interior surface finishes remain absent from the very administrative evaluation and oversight intended to protect the public from harm. In the absence of enforcement, the code merely serves as a mechanism to assign blame.

Over the life of a building, incremental change to interior space content is a frequent occurrence, driven by changes in ownership, tenancy, occupancy, and capacity

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or motivated by aesthetics, deterioration, obsolescence, and a desire for flexibility and responsiveness to the workforce. For example, in 2007, a full ninety-six percent of respondents to the annual International Facility Management Association (IFMA) survey indicated that they relocated personnel within the previous year.\textsuperscript{26} According to that same IFMA research, fifty-three percent of the relocations were due to routine churn, including colocation of staff to improve collaboration and maximize efficiencies, seventy percent was due to reorganization, forty-six percent was due to expansion, thirty-three percent to consolidation, eleven percent to downsizing, and nine percent to mergers.\textsuperscript{27} Although many of these moves likely involve moving only individuals and their files and supplies, many others involve the reconfiguration of open office and systems furniture, moveable modular wall panels, and other furnishings, all potentially outside the purview of either a qualified design professional or a regulatory agency. Certainly the replacement and/or update of interior finishes such as flooring and wallcovering occur with even greater regularity.

These unregulated modifications, because of their frequency and incremental nature, far outnumber the new construction or significant renovation projects. For example, new office construction completed in United States commercial office market during the first quarter of 2013 made up slightly less than one percent of all available

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\textsuperscript{27} Ibid., 2.
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office square footage. The overall vacancy rate in all United States markets is just over fifteen percent, down slightly from the previous quarter due to improved economic activity.

*The Encompassing Scope of Interior Space Content Delivery*

The limited number of licensed interior design professionals when compared to the variety of ways interior space content is selected and procured, would suggest that a very large percentage of interior space content is not covered by any kind of regulatory review or by licensed professional oversight in the current design practice environment (see Figure 4.2). Within the spectrum of interior space content delivery, a certain number of projects involving interior space content are required to be reviewed for building, life safety, and accessibility compliance by jurisdictional codes officials through the permitting process. Architects operate within this realm and, although they are specifically trained to consider issues of health, safety, and welfare of the public in their design work, out of an abundance of caution, the regulatory system requires a significant number of their designs undergo a second examination through the review and permitting process. A certain number of the architects’ projects may or may not engage the services of trained interior designers. Similarly, despite their specialized knowledge

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28 Cushman and Wakefield, Inc., Marketbeat Office Snapshot: United States: Q1 2013 (New York: Author, May 9, 2013), 2, accessed July 5, 2013, http://www.cushmanwakefield.com/en/research-and-insight/unitedstates/usa-office-snapshot/. In the first quarter of 2013, there was an inventory total of 4,805,104,522 commercial office properties in the United States. 47,558,079 properties were under construction. By way of comparison, in the second quarter of 2008, just after the U.S. economy dropped sharply into recession, new office construction completed in the U.S. commercial office market made up 0.74% of all available office square footage, an overall vacancy rate of 11.1% in central business districts and 14.5% in non-central business districts. Even with a 51% drop from the previous year (2007), new office construction still only represented just over 1% of the available commercial office square footage.
and training, qualified interior designers are often involved in projects that requiring regulatory review. Some of these projects are developed in concert with the work of architects; some are not. Both architects and interior designers have projects that, because of their size or scope, do not require additional regulatory oversight. Within the spectrum of delivery, others make interior space content decisions, sometimes with and sometimes without the assistance of either design professionals or within the purview of the regulatory authorities. Primarily, these decision-makers or participants are building owners (property owners, managers, end users), manufacturers (of furniture, finishes, equipment), vendors (dealerships, representatives, and others in the sales force), and a host of others – retailers, furniture re-furbishers and re-manufacturers, installers/reconfiguration specialists, and trained and untrained design practitioners (decorators, space planners, design consultants) selecting and procuring interior space content for habitable space.
Figure 4.1: Spectrum of Interior Content Delivery
A view of regulatory misalignment: the spectrum of interior space content delivery. Many interior space content decisions, without the assistance of trained design professionals or regulatory oversight, are made by property owners; facility managers; end-users; finish and furnishings, fixtures, and equipment (FF&E) manufacturers; vendors; and a host of others – retailers, furniture re-furbishers and remanufacturers, installers/reconfiguration specialists, and untrained design practitioners.

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The diagram is anecdotal in nature, simply because there is not enough data to clearly understand either the relative size of the market for interior space content or the number of providers of interior space content operating within the market. Unfortunately,
the US Census Bureau does not keep statistics on building permits on new construction starts in commercial and institutional building construction as it does in the residential housing sector. According to Dun and Bradstreet, in 2011, an estimated 12,100 interior design firms in the United States generated revenues of just under $7.3 billion.\textsuperscript{29} Another 17,100 self-employed designers increased that amount by as much as $1 billion.\textsuperscript{30} In addition, architecture firms received an estimated $1 billion in revenue from interior design services.\textsuperscript{31}

The full spectrum of interior space content is a multibillion-dollar industry that covers construction and retail trade, as well as professional and services sectors of the United States economy. Certainly there has been an explosion in recent years of content on décor and design in the media focusing on an increased consumer awareness of style and design, and of environmental issues. There is a proliferation of new or reinvigorated retailers and entire cable networks devoted to the democratization of design and the popular do-it-yourself trend encouraging individuals to express their personal style and design sensibilities. Recent industry statistics based on data from the United States Census Bureau suggests that the home furnishings stores market, including parent retailers such as Bed Bath & Beyond and Williams-Sonoma that sell a range of home furnishing goods including curtains, draperies, blinds, shades, cookware, glassware, dinnerware and decorative accessories, textile products, furniture, and other


\textsuperscript{30} Ibid.

\textsuperscript{31} Ibid.
furnishings and decorative accessories, is alone responsible for $30 billion in revenue; the market supports 13,073 businesses and employs 196,931 individuals, and grew by one percent between 2008 and 2013.\textsuperscript{32} A similar industry report for office furniture manufacturing in the United States, including companies such as Herman Miller, HNI Corporation (Allsteel, Gunlocke, HBF, HON), and Steelcase is responsible for $23 billion in revenue, and employs 109,797 people in 3,809 businesses nationwide.\textsuperscript{33} Carpet mills such as Berkshire Hathaway, Inc. (Shaw), Interface, and Mohawk Industries is responsible for $10 billion in revenue, and employs 31,445 individuals in 217 businesses.\textsuperscript{34} In 2012, the one hundred top billing interior design firms alone specified $65.2 billion in interior furnishings and fixtures, an increase of $7.4 billion from 2011.\textsuperscript{35}


Integration of Architectural and Interior Design Services

It is also unclear the degree to which architectural and interior design services are integrated in the performance of work related to the selection, specification, and installation of interior space content. Reformations in construction delivery systems, such as design-build and integrated project delivery can serve to muddy the waters between disciplines and areas of expertise and, at the same time, increase pressures to accelerate the construction process ever faster, make it quite common to separate the work involved in shell buildings intended for speculative or multi-tenant units from the completion of the interior portion of the work, often referred to as “fit-up.” As examined in the regulatory and permitting requirements of the City of New Orleans, Louisiana and the Metropolitan Nashville and Davidson County, Tennessee, most jurisdictions, even those that regulate the practice of interior design, require that plans and specifications for new construction and significant renovation be prepared by a state-licensed architect. However, little is known about how the two professions functionally meet this requirement. And, in projects where the requirement for architectural oversight is not required, what, if any, coordination occurs between the professions?

As discussed in Chapter One, there is a growing trend for many architectural firms to house interior design departments and to offer interior design services through the architectural practices. A cursory examination of the websites of Interior Design magazine’s list of the top 100 United States design firms that earned the highest annual design fees, known as the “2012 Top 100 Giants,” indicates that only sixteen percent of
the firms offer interior related services only. Of these “giants,” only three percent presented themselves as solely architectural firms, without listing interior design as a service at all, or listing it only as a subset of architectural services; the overwhelming majority of firms, ninety-five percent, co-mingled the services, listing both architectural and interior design services as separate and distinct services from a menu of services offered; two percent made no distinction between the disciplines whatsoever. The inclusion of interior design services in the architectural practice marketplace makes financial sense to smooth out the turbulent swings of project demand, especially for the nation’s largest firms. A comparison of the ASID Design Billings Index and the AIA Architectural Billings index reveals that during the steepest declines in architectural billings in the past several years, specifically January 2011 through May 2011 and again from November 2011 through May of 2012, billings for interior design work were operating at its highest levels, buoyed primarily by the demand for residential remodeling services, some new hospitality construction and remodeling, and continued healthcare and education projects.

36 Staff, “2012 Top 100 Giants,” Interior Design (January 1, 2012), accessed June 18, 2012, http://www.interiordesign.net/article/547396-2012_Top_100_Giants.php. Data are based on evaluation of description of services provided by each firm as published and available to the public on its respective website, accessed between June 18, 2013 and August 7, 2013. Web addresses for each firm were obtained from references in the Interior Design article cited above. See Bibliography for complete listing of website citations.

37 The 2020 “Top 100 Giants” referred to interior design services under a number of different titles. 53% of the firms surveyed used the term “interior designer;” 15% used the term “interior architect,” 20% used the term “interiors,” and 8% used others terms such as “designer,” space planning,” or very specific titles such as “corporate” or “office” interiors. Another 8% used multiple terms interchangeably when describing interior design services.

38 Michael Berens. Environmental Scanning Report, 28.
degree of integration between the disciplines involved remains vague since project size, scope, and firm culture and structure varies widely.

Summary Conclusion

Moreover, the “Top 100 Giants” are far from representing the interior design industry. According to the most recent United States Bureau of Labor Statistics data, there were approximately 40,950 employed interior designers in the United States in May 2011, the first increase since the economic downturn in 2008 – up two percent over 2010.\(^{39}\) The number of self-employed designers was 17,150.\(^{40}\) The one hundred “giants” represent slightly over one-third of the total interior design employment.\(^{41}\) Among employed interior designers, approximately forty percent work in interior design firms, twenty percent work in architectural firms, and the remaining interior designers are employed by furniture stores, home furnishing stores, building materials and supplies dealers, retail stores, construction companies, wholesale trade businesses, education, government, entertainment and various other business services. Even with the decline in employment from 2008 to 2010, the proportion of interior designers working in the various industries has remained about the same. In 2011, the number of interior

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\(^{39}\) Ibid., 26.

\(^{40}\) Ibid., 26.

designers working in furniture stores and home furnishings stores increased only slightly, less than one half of one percent each.

There is little doubt that the current regulatory system, which favors new construction and substantial renovation at the expense of overseeing a majority of interior space content provided outside of its jurisdiction, is, on its own, unable to fully ensure the health, safety, and welfare of the public.

It would seem, then, given this existing gap in the protection of the public with regard to interior space content, that there is adequate demand for the unique value proposition of interior design. Based on the information examined here, interior designers are uniquely qualified to provide an added and necessary level of protection to the public that the current system of regulatory control provided through architectural and engineering practice and through the involvement of codes enforcement officials cannot provide in the current market.

**Current Oversight of Regulatory and Practice Standards**

Given the concerns raised about the current licensure and regulatory norms with regard to the delivery of interior space content, it is important to examine the status and present capabilities of the interior design profession itself. If, as the research thus far has illustrated, the practice of interior design directly and significantly impacts the health, safety and welfare of the public, then how prepared is the interior design discipline to deal with the responsibility of a more defined and meaningful role?
**Legislative Action**

To date, the interior design profession has only been moderately successful in gaining legal and legislative recognition. There are presently thirty-six interior design laws enacted in North America that recognize the profession of interior design. Only six states and United States territories (Alabama, Louisiana, Florida, Nevada, District of Columbia, and Puerto Rico) and one Canadian province (Nova Scotia) have laws that regulate the practice of interior design in addition to protecting a regulated title, as well as providing for privileges that allow interior designers to sign and seal their documents as state-licensed professionals for recognition by jurisdictional authorities in the permitting process for non-structural construction and renovation.  

Eleven states have title acts that recognize a protected title and/or provide limited signing and sealing privileges (California, Colorado, Texas, Minnesota, Georgia, Kentucky, Virginia, Maryland, New Jersey, New York, and Connecticut). Despite the signing and sealing privileges included in the statutes in these eleven states, an architect or other licensed design professional must still produce or supervise the documentation required for the construction permits of all interior design work where required by the

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state. The protected titles vary in each of these eleven states, but include “Certified Interior Designer,” “Registered Interior Designer,” and “Interior Designer.”

Eleven other states have title acts that recognize a protected title and provide no signing and sealing privileges (New Mexico, Oklahoma, Iowa, Missouri, Arkansas, Wisconsin, Illinois, Indiana, Tennessee, Mississippi, and Maine). As in the title acts listed above, an architect, engineer, or other licensed design professional must supervise the production of construction documents required for construction permits for all interior design work required by the state. As above, the protected titles vary in each state, and include “Licensed Interior Designer,” “Licensed Designer,” “Registered Interior Designer,” “Wisconsin Registered Interior Designer,” and “Certified Interior Designer.”

Twenty-four states currently have no interior design regulation.


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45 American Society of Interior Designers, Interior Design Registration Laws.

46 International Interior Design Association, United States Interior Design Laws – Protected Titles.

47 American Society of Interior Designers, Interior Design Registration Laws.

48 Ibid.
of Puerto Rico, Nevada, and Washington, DC, each initially passed as a practice act; practice laws in Alabama, Florida, Louisiana, Nova Scotia, were amended from previous title regulation.

The legislative press continues. Legislative coalitions are active in thirteen of the twenty-four remaining states without interior design regulation. Recent legislative action of all sorts occurred or is pending in seventeen states. The following will serve as a brief paraphrased summary of the status of significant legislation that affects interior design practice in states where current actions are in process to defend and/or strengthen existing regulation:

1. California: Senate Bill (SB) 308 includes general sunset review as well as provisions and modifications to the existing title law to strengthen permitting privileges. This bill is in process.
2. Colorado: SB 161 includes general sunset review. This bill was signed by the Governor in May 2013.
3. Connecticut: House Bill (HB) 6404 includes strengthening of existing law to allow interior designers to utilize a seal. This bill was signed by the Governor in June 2013.
4. Connecticut: HB 6493 includes changes to language to clarify certain references to interior designers in the general statutes by adding the term “registered.” There was a public hearing in March 2013.
5. Florida: HB 575/SB 286 specifies conditions under which design professionals employed by a business entity or agent of a business entity may not be held individually liable for damages resulting from negligence occurring within the course and scope of a professional services contract. SB 286 passed the senate in April 2016; the house bill is currently in process.
6. Florida: SB 720 includes general sunset review for professions and occupations. This bill is process.
7. Indiana: SB 520 includes general sunset review for regulated professions. This bill is in process.

8. Massachusetts: HB 2832/SB 1557 includes new legislation to allow interior designers to bid on state contracts, the first step in the process of professional recognition in the state. These bills are in process.

9. Michigan: HB 4378 establishes an interior design title act. These bills are in process.

10. Minnesota: House File (HF) 1052/Senate File (SF) 842 modifies the current title act with sign and seal privileges to a practice act. These bills are in process.

11. Missouri: HB 774 includes general sunset review for regulated professions. This bill is in process.

12. Nevada: AB 434 revises certain requirements for an application for a certificate of registration to practice as a registered interior designer. This bill was approved by the Governor in May 2013.

13. New York: AB 1678 amends the state finance law in relation to contracts for interior design services. This bill is in process.

14. New York: AB 6717 amends the education law in relation to the practice of certified interior design. This bill is in process.

15. New York: SB 1955 amends the business corporation law, the education law, and the limited liability company law to permit certified interior designers to enter into joint enterprise or partnership of a design corporation. This bill is in process.

16. New York: SB 3025 amends the education law regarding representatives to be appointed to state boards for the professions. This bill is in process.

17. New York: SB 4660 amends the education law relating to the practice of certified interior design. This bill is in process.

18. Oklahoma: SB 111 clarifies language relating to the Board of Governors of Licensed Architects, Landscape Architects and Registered Interior Designers to make it more inclusive of the disciplines subject to it. This bill is in process.

19. Oklahoma: SB 784 renames the act relating to state architectural and interior designers act to be more inclusive of the disciplines subject to the law. This action was taken February 2013.

20. Pennsylvania: HB34 requires the design, construction, and renovation of certain State-owned or State-leased buildings to comply with specified energy and environmental building standards. This bill is in process.

21. Pennsylvania: SB 221 amends the Tax Reform Code of 1971 to provide for the High-Performance Buildings Tax Credit. This bill is in process.

22. South Carolina: H 3417/S 339 provides for a registered interior designer practice act. These bills are in process.
Three bills introduce new regulation of interior designers. Michigan’s House Bill 4378 would introduce title regulation to a currently unregulated state. South Carolina’s House 3417/Senate 339 bills would introduce practice regulation to a state that has never had interior design regulation. Minnesota’s House File 1052/Senate File 842 would replace a current title act with a full practice act with sign and seal privileges.

Several other bills outlined above lay the framework for future title and/or practice acts by changing existing state regulation to allow the profession to be formally recognized by the state, often an important first step for future endeavors. Massachusetts House Bill 2832 and Senate Bill 1557, Pennsylvania’s House Bill 34 and Senate Bill 221, and New York’s Assembly Bills 1678, 6716, and Senate Bills 1955, 3025, and 4660 are three such examples. Other bills, namely those in Connecticut, Florida, Nevada, Oklahoma, and Texas, are intended to clarify and/or strengthen the statutory language or requirements in order to better protect the public and interrelate with other existing state regulation.

Still others in California, Colorado, Florida, Indiana, Missouri, and Texas are part of normal, procedural state “sunset” reviews that evaluate the effectiveness of the regulation of professions within the state. Although occasionally these reviews may
provide an opportunity for serious challenge from groups opposed to interior design or other professional regulation, but more often the sunset review, provides an opportunity to evaluate the effectiveness of the current laws and to offer substantive modifications to strengthen the regulation for the benefit of the public and all involved.

Summary Conclusion

It is clear that significant legislative efforts are underway within the interior design profession, and that there is an overarching strategic plan in place to reach the ultimate goal of consistent practice regulation in every state and United States territory so as to provide every interior designer the right to practice to the fullest extent possible. However, the current legislative conditions within the practice of interior design are not so significant as to fully protect the public. Not only are there few effective practice acts, but there has not been a practice act passed for ten years. It seems that the profession is still short of the critical mass necessary to transform the current title act environment. Furthermore, the current title acts are completely ineffective in the protection of the public in the matter of interior space content, since the regulation does nothing to prevent anyone, qualified or not, from practicing interior design under any other title than the one (or ones) protected by the regulation. While it is true that the existence of practice acts may assist in informing the public of the differences between “registered” interior designers and other sorts of practitioners, it does little to ensure that only trained interior designers are involved.

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designers participate in the selection, specification, and installation of potentially hazardous interior space content.

It appears that the current legislative environment will persist well into the future, or at least until such a time that the professional leadership modifies its current legislative policy with respect to the broad nature of interior design practice. Its present policy calls for a tiered expansion of interior design practice into the realm of the protection of the health, safety and welfare of the public, but only to those interior design practitioners who desire it. The policy perpetuates the notion that interior design has clear levels of specialized knowledge that should allow an interior designer to practice in large, complex projects or in high-risk occupancies, when a designer so desires and is appropriately qualified. At the same time, the policy allows others with varying degrees of knowledge and training – or perhaps none at all – to practice interior design when the scope of work does not impact the health, safety, or welfare of the public. This formalized policy, published by ASID, a leader in interior design legislative advocacy states:

ASID believes that legal recognition of our profession is best achieved through the enactment of legislation that:

- Does not limit, restrict or prevent the practice of interior design.
- Does not limit, restrict or prevent anyone from using the title of “interior design” or “interior designer.”
- Allows state-qualified interior designers to use the title “registered,” “certified” or “licensed” interior designer.
- Allows state-qualified interior designers to perform additional services related to the practice of interior design as
In other words, the profession is advocating a higher level of service – a specialized definition of “registered,” or “certified,” or “licensed” interior design that would be available to those practitioners who desire it, or made available to those consumers who choose it. This is a tenuous position a best. The interior design profession has a difficult enough time clarifying to the public, to allied professionals, codes officials, legislators, and even to those within its own ranks the subtle distinctions between interior design, architecture, and interior decoration. To further complicate the practice is to defeat its initial purpose. To make the public a primary decision-maker with regard to its own health, safety, and welfare within a complex and technical field is negligent. Until the profession determines that it cannot be all things to all its constituents, the current legislative predicament will persist, and the protection of the public will be seriously compromised. If the interior design profession is to truly protect the public using legislative means, it must provide that protection under all circumstances, not just when a practitioner chooses to participate in an expanded definition of interior design practice.

IIDA’s policy position takes a more rigorous line with respect to legislative direction. While IIDA does formally support the inclusion of “grandfathering” clauses to include existing practitioners by giving those with a record of interior design education and/or extensive experience an opportunity to prove their practice competency by taking

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the NCIDQ examination even if they do not meet all other requirements to do so, it does not support the ability for all those who currently practice interior design or call themselves interior designers to continue to practice without qualification. The policy states:

IIDA encourages its members to see enforceable legislation needed for individuals to provide services as licensed/registered/certified interior designers conforming to the following standards:

a. Minimum design education accredited by CIDA [Council for Interior Design Accreditation], or equivalent;

b. Requirement for professional experience;

c. That the National Council for Interior Design Qualification NCDIDQ be the primary and sole vehicle for examination for the interior design profession;

d. A code of guidelines for professional practice and ethics;

e. A schedule for requiring continuing education;

f. Grandfathering with education experience and examination criteria;

g. A clear definition of “interior designer” as developed by NCIDQ; and

h. Sealing privileges to substantiate documentation prepared by a licensed/registered/certified interior designer.

In conclusion, not only is the current cache area of effective legislative protections for the public questionable at present, but the current legislative policies and strategic vision of much of the professional leadership is flawed, seriously limiting the

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53 International Interior Design Association, *Policy I.1: Position Statement on Licensing/Registration/Certification*, March 2011, accessed July 7, 2013, http://www.iida.org/resources/content/1/0/1/documents/IIDAPolicy_Licensure.pdf. The practice of “grandfathering” is a widespread practice that has been used in virtually every professional realm, including architecture, engineering, and landscape architecture. The grandfathering clause is typically used at the onset of regulation and is phased out over time so that, by a date certain, only fully qualified practitioners may be licensed by the state.

54 Ibid.
ability of the interior design profession to appropriately bear the responsibility of protection of the health, safety, and welfare of the public.

*Professional Credentialing and Certification*

There are a number of professional credentialing systems within the interior design profession that are intended to assist the public in identifying competent and trained practitioners. Considering the extent to which each of these systems may apply to the estimated 40,750 interior designers employed in the United States will assist in evaluating the readiness of the profession to protect the health, safety, and welfare of the public.\(^5\)

*Association Membership and Credentialing*

There are two primary professional associations in the interior design industry: the American Society of Interior Designers (ASID) and the International Interior Design Association (IIDA). The two commonly work in tandem on legislative matters and on other issues for the advancement of the profession. Both have similar categories of membership, each with distinct requirements for acceptance into that category.

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ASID claims 30,000 members in nine membership categories, of which there are 16,000 “practicing members,” 6,500 industry partners, and 7,500 student members. Unfortunately, ASID does not publish categorical details of its membership, especially for those practicing at the highest level of competency. There is much speculation that ASID refrains from publishing this information because it has a relatively small proportion of professional members among its broad membership, evidenced by the association’s consistent legislative policies that insist on the continuation of interior design practice by non-credentialed individuals. For example, in 2012, ASID added a new membership category and credential to its membership offerings: Associate Membership provides for individuals with no postsecondary education in specific interior design subject matter but who can demonstrate a minimum of six years of full time interior design practice experience and a minimum of an associate’s degree in another subject to become a member of ASID. It appears that the association is intent on growing its membership in an area that, on the face of it, would seem counterproductive to the goal of raising the professional bar with respect to the protection of the public since, these new members of the organization are not qualified to meet even the minimum requirements set by those states with practice legislation.

Others argue that bringing untrained interior designers into the fold of the professional organization offers opportunities to provide supplemental training and

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awareness of practice issues that might not otherwise be possible. ASID does have a continuing education requirement for its interior designer members of .6 continuing education units (CEUs) every two years in order to maintain membership in the organization. 58 Associate members must complete a prescribed course of online CEUs in the first twelve months of their membership. The cost of membership in this category is equivalent to the cost of professional membership.

Among other membership categories and associated credentials ASID considers “practicing professionals” are:

1. Professional Membership. This membership category requires proof of passage of the NCIDQ examination establishing minimal competency to practice interior design. 59 As a result of the NCIDQ exam requirement, professional members of ASID have completed an interior design specific postsecondary educational program and have completed a supervised internship experience. 60 This category may also include professional educators who meet all the requirements of a professional practitioner. 61

2. Allied Membership. This membership category includes members who have completed an interior design specific or architectural specific postsecondary

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58 One Continuing Education Units (CEUs) equals ten contact hours of learner interaction with the content of the learning activity; each .1 CEU equals one contact hour of instruction. Per the requirements of ASID, .6 CEUs equals six contact hours biennially.


60 Ibid.

61 Ibid.
educational program from an accredited institution but have not taken the NCIDQ examination establishing minimal competency to practice interior design.\textsuperscript{62} This category may also include professional educators who meet all the requirements of an allied practitioner.\textsuperscript{63} There is no mechanism within the membership system to require allied members to complete a path to professional membership within a prescribed period of time. However, ASID does offer a considerable financial incentive, a free year of professional membership (presently $450) upon passage of the NCIDQ examination and application for advancement to professional membership.\textsuperscript{64}

In order to promote continued training in the practice, ASID requires all practicing members – professional, allied, and associate members – to complete biennial CEU coursework or be subject to termination of membership.\textsuperscript{65} Similarly, all members of ASID, practicing and non-practicing, are subject to the association code of ethics and are subject to disciplinary proceedings in the case of misconduct. Article IX Disciplinary Proceedings state, “Any member shall be subject to Society discipline if such member in any manner violates his/her obligations under these Bylaws, or the Code of Ethics, or engages in any conduct detrimental to the welfare and interest of the Society, its


\footnotesize{\textsuperscript{63} Ibid.}

\footnotesize{\textsuperscript{64} Ibid.}

chapters, or its members, or to the interests of the Profession or otherwise conducts himself in an unprofessional manner as an interior designer.”

It is also interesting to note that all practicing membership categories currently pay the same annual membership rate, presently $450. There are no distinctions between a professional member, an allied member on a path to professional membership, or an associate member. Only practicing members who are professional educators receive an annual rate reduction.

As of February 2012, IIDA had 12,632 members in nine membership and credentialing categories, including professional interior designer, professional architect, associate, educator, student, affiliate, international, international design school, and industry. IIDA practitioner member categories are as follows:

1. Professional Interior Designer. To qualify for membership in this category, a member must provide proof of passage of the NCIDQ exam establishing minimal competency to practice interior design. As a result of the NCIDQ exam requirement, professional members of IIDA have completed an interior design specific postsecondary educational program as well as a supervised

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66 Ibid., 11.


intern work experience. This category may also include professional educators who meet all the requirements of a professional practitioner.

2. Professional Architect. This membership category is provided for architects that are actively engaged in the profession of interior design and requires proof of successful completion of the Architect Registration Examination (ARE) establishing minimal competency to practice architecture. As with the NCIDQ examination, proof of the ARE exam also provides proof of appropriate education and qualified, monitored internship experience in the field.

3. Associate. The associate membership category is provided for members who have completed a formal postsecondary interior design education but have not yet taken the NCIDQ examination to prove minimum competency to practice interior design. The intention of this category is to support young interior design professionals on a path to full professional recognition. As a result, membership in this category is provided at a reduced annual cost, currently $279 rather than the $488 for professional membership, for a period of six years. After six years without completion of the NCIDQ examination and application for full professional membership, the annual rate for associate

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69 Ibid.
memorization is raised to match that charged to professional members. 73 This category may also include professional educators who meet all the requirements of an associate practitioner. 74

As with ASID, IIDA requires all practicing members to complete continuing education as a condition of ongoing membership. 75 For IIDA, the requirement extends to all professional and associate members, active and inactive, to complete and report 1.0 CEUs biennially. IIDA extends the continuing education requirement to educator members, IIDA Fellows, and chapter officers.

Additionally, IIDA requires all practicing members to adhere to the *IIDA Code of Ethics for Professional and Associate Member Conduct* as a condition of membership. The preamble states,

> Professional and Associate Members of the International Interior Design Association shall conduct their interior design practice in a manner that will encourage the respect of clients, fellow interior designers, the interior design industry and the general public. It is the individual responsibility of every Professional and Associate Member of IIDA to abide by the Code of Professional Ethics and Conduct, Bylaws, Policies and Position Statements of the Association. 76

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73 Ibid.

74 International Interior Design Association, *Member Types: Educator*.


Like ASID, IIDA does not publish its membership by categorical breakdown; however, IIDA has a comparatively large number of interior design practitioners within its ranks. IIDA states that, in 2012, seventy-one percent of its members are NCIDQ certificate holders and thirty-one percent of its members are registered architects, qualifying all to be licensed, registered, or certified interior design practitioners in all regulated states and territories, even those with the most stringent practice laws. Applying the reported percentages to the February, 2012, total membership number of 12,632 members, 8,842 IIDA members are qualified practitioners, if not fully recognized professional members. Similarly, 3,916 IIDA members are registered architects, if not fully recognized as professional architect members of IIDA.

Summary Conclusion. Accurate numeric deductions are unattainable since it is impossible with the information provided to accurately assess the number of IIDA and/or ASID members that are proven competent to protect the health, safety, and welfare of the public under the most stringent of existing laws. Further, with the information provided, it is impossible to gage the number of practitioners that many be members of both organizations. That said, it is possible to make some rough assumptions to gain an overall view of the potential cachement area provided to the interior design profession by the professional associations. Even if we assume the best of all circumstances, that all of ASID’s 16,000 practitioner members would be qualified under practice laws to practice interior design, and add to that IIDA’s 8,842 qualified NCIDQ certificate holders (and also conservatively assuming that all of the 3,916 registered architects are also NCIDQ
certificate holders), the resultant total number of qualified practitioners, 24,842, is only forty percent of the 40,950 total number of interior designers in the industry as estimated by the United States Bureau of Labor Statistics. Layer on to that the extremely high probability that a much lower percentage of ASID practitioner members are not qualified to practice under current practice law, the prospects for protection of the public health, safety, and welfare seem rather untenable. Admittedly, it appears that the overall cachement area of both professional associations provides an opportunity to reach a reasonable percentage of the 40,950 possible practitioners in the field in ways that can raise the bar over time and promote change that might ultimately benefit the public. Nevertheless, the purpose of this assessment is to evaluate the degree of current readiness to take on the responsibility of protection of the health, safety, and welfare of the public with regard to the delivery of interior space content. With that in mind, the conclusion must be that the protections provided through existing professional association credentialing falls substantially short of that goal.

Professional Certification Programs

There are a number of certification programs in the interior design profession. The most well known and most widely accepted of all of them is the NCIDQ examination. Successful completion of the NCIDQ examination is required for professional registration
in twenty-six states and United States territories and Canadian provinces that have enacted licensing or certification statutes.\textsuperscript{77}

In order to be defensible in the courts, credentialing and licensure exams must be carefully developed for validity, reliability, and fairness. CIDQ utilizes the same standards for developing, administering, and scoring its NCIDQ examination as virtually all other professional licensing examinations, following the guidelines published in the \textit{Standards for Educational and Psychological Tests} published jointly by the American Psychological Association, the National Council on Measurement in Education, and the American Educational Research Association.\textsuperscript{78} The NCIDQ examination consists of two multiple-choice sections and a design practicum, each entirely focused on health, safety, and welfare.\textsuperscript{79} The examination development process is outlined as follows:

1. Practice Analysis. Each five to eight year examination development cycle begins with an updated practice analysis that identifies current knowledge and skills that define a minimally competent professional in interior design. The process begins with a panel of subject-matter experts that define practice areas and distinct tasks, knowledge, and skills necessary for competent performance, which is then validated through a survey of practicing interior


designers to rate the frequency, importance, and criticality of the identified practice areas and the defined tasks, skills, and knowledge.

2. Development of a Test Blueprint. Next, CIDQ uses the results from the practice analysis to develop a “blueprint,” or template, for the multiple choice portion of the examination by translating the importance of each area of practice and task included into a formula for percentage of questions in each area and the relative weighting for scoring.

3. Item Development and Validation. Exam questions, known technically as “items,” are written and reviewed by subject-matter experts specifically trained in writing, reviewing, editing, and validating questions. The practicum portion of the examination is developed according to appropriate strategies and standards for the design and scoring of this type of examination, and follows guidelines and recommendations developed by independent organizations including American Educational Research Association, American Psychological Association, National Council on Measurement in Education, and National Commission for Certifying Agencies.

4. Pretesting of Test Questions and Examination Assembly, Review, and Revision. All questions are pretested by NCIDQ exam takers as unscored items and then analyzed statistically to ensure quality and reliability before being assembled into the examination form that matches the test blueprint. The draft examination is then carefully reviewed by interior designers for accuracy and by testing experts to ensure integrity.
5. Passing Point. CIDQ works with its testing consultant to determine a defensible, criterion-referenced passing score to separate candidates who pass from candidates who fail based on the minimum competence required to protect the public from harm.

6. Test Administration. The test is administered to candidates. Testing facilities must meet CIDQ guidelines for security, room size, ventilation, facilities, accessibility and noise control.

7. Analysis and Quality Control. Following the examination administration, CIDQ’s psychometric consultant conducts systematic analyses to ensure the proper function of each question and problem, the test as a whole, as well as extensive reliability and quality studies.\(^{80}\)

8. Exam Scoring. The multiple choice exam sections are scanned and scored by computer. Scores are reported on a scale ranging from 200 to 800; the passing point for the multiple choice section is anchored at 500. Practicum examinations are scored by interior design professionals who have been rigorously trained to apply specific grading criteria prior to each grading session. The performance of every grader is monitored for compliance with the grading standards. Each part of the test is scored separately by at least two independent graders who are unaware of the other grader’s score. If the two graders disagree on whether a solution is passing or failing, it is automatically scored a third time by a grading coordinator to resolve the difference.

\(^{80}\) Ibid.

Each certification and resulting credential serves to identify to the public specialized design competencies, typically above and beyond those core competencies of practice. Such identification benefits the public. However, without regulation that requires such competencies – or the core competencies on which they are built – each does little to protect the public from harm.

Summary Conclusion. Given the rigorous nature of the examination development, its extensive scope covering the entirety of interior design practice, its intensive focus on health, safety, and welfare content, and the overall reliability, validity, and fairness of the test, the NCIDQ examination appears to sufficiently identify to the public those interior designers who are minimally competent to practice interior design. Additionally, the examination’s wide acceptance in all jurisdictions that regulate the profession provides a necessary consistency both regionally and nationwide. It appears that there is no reason to doubt its continued acceptance in future regulation. And, although the current cacheMENT area, when compared to the 40,950 total number of interior design practitioners identified by the United States Bureau of Labor Statistics yields sixty-five percent coverage, it is a number that is a distinct improvement over the coverage and protections provided by the professional associations alone.

The crux of the issue is the solidity of the connection between the NCIDQ examination and the legislative requirement for registration. Since an overwhelming majority of interior design regulation is title based and, as such, is largely voluntary in nature, the current regulatory system provides little in the way of protection of the public.
By way of example, NCIDQ certificate holders in the five jurisdictions in the continental United states that currently regulate the practice of interior design, thereby requiring NCIDQ certification as a means to practice represents 3,632 practitioners – just fourteen percent of the total number of NCIDQ certificate holders in the entire United States.\(^{83}\) Should the legislative tide turn and a requirement of NCIDQ examination passage in order to practice interior design becomes mandatory, the protections offered to the public within the regulatory system would then be significant. Until then, it falls far short of being effective.

*Postsecondary Educational Accreditation*

Over its forty-year history, the Council for Interior Design Accreditation (CIDA), known prior to 2006 as the Foundation for Interior Design Education Research (FIDER), has evaluated specific degree, diploma, and/or certificate programs in interior design at hundreds of colleges and universities throughout North America.\(^{84}\) CIDA is widely recognized as a reliable authority on professional-level interior design education. A CIDA-accredited degree is accepted by NCIDQ as proof that a candidate for the examination has met the appropriate educational requirements for an interior-specific

\(^{83}\) Council for Interior Design Qualification, *Number of Certificate Holders by State/Province: Updated 1/2013*.

course of study. Similarly, most if not all existing interior design legislation acknowledges CIDA’s authority, as does the Council for Higher Education Accreditation (CHEA).85

One of CIDA’s fundamental responsibilities is the establishment and periodic update of standards for interior design education using data on current conditions but also of trends affecting the interior design and related industries, interior design practice, and educational institutions as well as accreditation practices.86 “Setting standards is a continuous cycle of monitoring, examining the important triggers for needed change, information gathering, validation, consensus building, adoption and, finally, implementation.”87 Major revisions to the standards are conducted on a five- to ten-year cycle; limited revisions focused on selected issues take place on an ongoing and as-needed basis.88

Another of CIDA’s fundamental responsibilities is the evaluation and accreditation of college and university interior design programs. Using internationally recognized educational standards, CIDA employs a thorough three-step process to review and evaluate programs seeking accreditation.89 The process includes: 1) self study and evaluation by the institution culminating in the submission of a report detailing its


88 Ibid.

89 Ibid.
findings; 2) intensive three-day site visits to provide evaluation of the institution’s program in order to confirm the level of compliance with accreditation standards; the visiting team prepares a written report with analysis and general comments; and 3) deliberation and final decision granting or denying accreditation based on the program’s level of compliance with the standards.\textsuperscript{90} The decision is rendered by the seven-member Accreditation Commission, which is comprised of site visitors from a cross section of the profession, all with firsthand experience regarding the complexities of accreditation.\textsuperscript{91}

Currently accredited programs total 259, reaching an estimated 20,000 students, all culminating in a bachelor’s or professional-level master’s degree.\textsuperscript{92} CIDA has made major strides in the past decade in raising the educational bar in the interior design profession. All pre-professional level programs have been fully phased out. Accreditation of the Pre-Professional Assistant Level standards ended on December 31, 2003; applicant programs were given until January 1, 2010 to demonstrate that the program culminated in a minimum of a bachelor’s degree in order to seek CIDA accreditation.\textsuperscript{93}

An evaluation of the current (2011) and upcoming (January 2014) Professional Standards “used to evaluate interior design programs that prepare students for entry-level interior design practice and position them for future professional growth” reveals a

\textsuperscript{90} Ibid.

\textsuperscript{91} Ibid.


distinct emphasis on awareness, knowledge, and application of skill necessary to protect
the health, safety and welfare of the public.\textsuperscript{94} Seven of the fifteen standards relate
directly to issues of health, safety, and welfare.\textsuperscript{95} These standards include: human
behavior/human-centered design; design process; professionalism and business
practice; furniture, fixtures, equipment, and finish materials; environmental
systems/environmental systems and controls; interior construction and building systems;
and regulations.\textsuperscript{96} Another four – global perspective for design; communication; color
and light; and collaboration – have significant components that affect public health,
safety, and welfare.\textsuperscript{97} History and space and form, although critical to the practice of
interior design, do not directly affect health.\textsuperscript{98} Similarly, the remaining three standards –
mission, goals, and curriculum; assessment and accountability; and support and
resources – do not affect health, safety, and welfare, but rather relate to program
administration.\textsuperscript{99}

Operating at a much smaller level, the National Kitchen and Bath Association
(NKBA) accredits twenty-seven associate’s degree/certification/diploma programs and

\textsuperscript{94} Council for Interior Design Accreditation, \textit{Professional Standards}, 2010, accessed July 7,

\textsuperscript{95} Council for Interior Design Accreditation, \textit{Professional Standards 2011, Adopted June 2008,
http://accredit-id.org/wp-content/uploads/2010/03/Professional-Standards-2011.pdf; and

\textsuperscript{96} Ibid.

\textsuperscript{97} Ibid.

\textsuperscript{98} Ibid.

\textsuperscript{99} Ibid.
thirteen bachelor’s degree programs (BA and/or BS) in interior design for competencies in the area of kitchen and bath design, and supports twenty-one other programs.\textsuperscript{100} As with most accreditation, programs voluntarily participate in the review and evaluation process. NKBA accreditation requires competencies in construction systems, design, and business and contract management.\textsuperscript{101} Despite its non-comprehensive nature, NKBA accreditation is still a likely indicator of health, safety, and welfare content within a program.

**Summary Conclusion**

As is the case with the current status of professional certification, the quality of the certification and its wide acceptance as the gold standard in the profession is not in question. There is, at present, no reason to doubt that CIDA accreditation will continue in its present course. What is in question is the ability of the current system to serve or oversee the majority of interior design education in the United States in order to protect the public. Just as is the case with other regulatory and practice standards, the cachement area is quite small. Based on statistical analysis produced by Georgia State University for the United States Department of Labor, there were 564 degree-conferring interior design programs in 365 schools in the United States and its territories in the


\textsuperscript{101} Ibid
2008-2009 reporting period.\textsuperscript{102} Those same programs conferred degrees to 4,506 bachelor and master students and 3,803 degrees to associate degree or certification program students in the same period. To date, CIDA comprehensively accredits 259 bachelor’s and master’s programs in interior design, just forty-six percent of the total programs in the United States. Even when considering the additional impact of NKBA accreditation for thirteen additional bachelor’s-level programs, the cachement area still falls below fifty percent. Add to that the fact that there is no comprehensive accreditation of the 3,803 associate degree or certificate students who will be entering the practice upon graduation, it is hard to state that there is much in the way of protection of the public with regard to interior design services or the delivery of interior space content.

\textit{Practice Implications}

For a long time, interior designers have sought to convincingly prove that they can play a vital role in protecting the public health, safety, and welfare. A segment of the available proof has been provided here, along with a possible methodological approach to leveraging alternative data sources to improve both the substance and form of the arguments used to date, and to better formulate and communicate the value proposition of interior design with respect to other participants in the interior design market. The interior design profession, by its unique position in the delivery of interior content,

provides essential knowledge and expertise that can protect property and lives, especially within the unregulated fissures in the implementation and enforcement of life safety codes and in the oversight of other regulated practitioners. There is little doubt, that with expansion of the current systems of education and experiential training, competency examination and other professional credentialing and recognition by regulatory authority of the qualified interior design practitioner, interior designers could participate as equal and contributing partners with other professions designing and maintaining public health, safety, and welfare within the built environment. But, in order to get there, the interior design profession must effectively communicate this necessity, and it must marshal the fortitude to address difficult questions.

- Is the establishment – the interior design profession’s leadership – willing to acknowledge and accommodate distinct, complimentary, professional paths within the field?

- Should the profession establish qualifications not only for the practice of interior design but also, not unlike the paralegal or the nurse practitioner, for those distinct complementary participants whose work contributes to the broad spectrum of interior design?

The existing and persistent desire to continue to use the title “interior designer” to define a complicated and increasingly stratified set of tasks, replete with variations in responsibility, criticality, and liability, one could argue is short sighted and destructive to the long term goals of 1) recognition of the real value of interior design by the public, and
2) provision of the opportunity for interior design professionals to practice to the fullest extent of their education and ability. A decision to act as an umbrella profession may provide impressive membership numbers and the appearance of collective unity and strength. However, the reality is that the more layers that must be represented, the greater the necessary divergence of agendas. Further, the determination to define interior design in relation to current conditions inevitably limits the potential of the profession. For example, the presently accepted definition of interior design – and many of the definitions within current legislative language – says much more about what interior design is not than what it interior design is. It defines the ways in which interior designers are not architects rather than defines beneficial overlaps between the two professions. As a result of not stepping on the toes of the related professions, the interior design profession has limited its ability to fully practice within its area of expertise.

As discussed in Chapter One, sociologists Harold Wilensky and Andrew Abbott, among others, suggest that a necessary step in the path to the professionalization of an occupation is to change the name of the profession in order to create a distance from the past, to subdivide labor and areas of expertise, and to better define and distinguish itself as it forges a new future. While interior design did exactly that in or around 1950 as a means to separate itself from “interior decoration,” it may again be necessary for clarity of purpose and the communication of that purpose. It seems that the interior design profession would be well served to examine closely models from other regulated and

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self-regulated professions that have successfully addressed such issues. In the medical model, for example, a broad umbrella title of “nurses,” includes certified nursing assistants (CNAs), licensed practical/licensed vocational nurses (LPNs/LVNs), registered nurses (RNs), and nurse practitioners (NPs), each with its own scope of practice, applicable regulations, and relative liabilities. In the case of architectural and engineering laws, the operative distinctions between the professions are often indistinguishable. Instead of limiting the scope of practice by defining boundaries, the professions utilize their respective codes of ethics to permit, even enable overlaps in knowledge, tasks and services, yet ensures that practitioners operate within their proven areas of expertise.

Regardless of the direction, unified strategic leadership and funding will be critical.

• Is the collective interior design establishment equipped and committed to provide the cohesive leadership and resources necessary to make a forceful argument to the public and to regulatory bodies?

• Is the establishment dedicated to the accountability and full participation in the larger design community once full recognition is attained?

And perhaps more even more to the point,

• Is the profession prepared to fully contribute as respected participants in a fully regulated environment?

• Are practitioners willing and able to assume their full responsibility to the public to mend the current gaps in health safety and welfare?

The answers to these and other questions will likely change the face of the interior design profession. One thing is certain: the future for all interior design professionals will
be different than the status quo. To have a seat at the table and continue to participate in the design of an ever more complex built environment, the interior design profession must collectively take a more proactive role in its own destiny.

**Industry and Regulatory Implications**

First and foremost, it is hoped that, among the outcomes of this study, this work will serve as a catalyst for a broader discussion within the interior design discipline, and within the larger design and construction industry. In particular, an honest appraisal of existing protection regulation is needed to improve the significant gaps in the protection of public health, safety, and welfare identified as a part of this study. Additionally, a more thorough understanding of the interior design profession and the ways in which its practitioners deliver services and interior space content is essential to successful solutions.

**Research Implications**

There is a great deal of research work to be done; the intention of this work was to identify the existing gaps in both the understanding of the interior design marketplace and in the data that support an evidence-based jurisdictional claim to the health, safety, and welfare of the public on the part of the interior design profession.

Although this work focuses predominantly on the interior design, architectural, and regulatory professions and only tangentially acknowledges the impact of others involved in the selection and procurement of interior space content for habitable space such as building owners (property owners, managers, end users), manufacturers (of furniture,
finishes, equipment), vendors (dealerships, representatives, and others in the sales force), and a host of others – retailers, furniture re-furbishers and re-manufacturers, installers/reconfiguration specialists, and trained and untrained design practitioners (decorators, space planners, design consultants), a clear understanding of the market is an imperative. In particular, more work is needed to a) identify participants in the universe of interior space content delivery and understand their relationships to one another, b) better understand their proportionate share of the market, and c) correlate the extent of their work with respect to the materials and/or occupancy types implicated in Chapter Three in the fire loss of life and property.

For example, a survey instrument was developed by the author as an attendant extension of this work in order to more fully explore the complex relationships between interior design and architectural practitioners, issues such as the timing and integration of their relative services, the extent to which each is involved in the project and occupancy types implicated in interior space content cases of harm, and explore attitudes within each discipline regarding practices and practice standards of the other (see Appendix C). In addition to demographic questions of practice, registration and licensure, the survey question address on the following:

- Involvement in interior design services (type of services offered in-house, qualifications of employees providing those services);
- Procurement of interior design services (process and method involved in hiring consultants, qualifications of those consultants);
- Degree of integration between interior design and architectural services;
• Proportion of work in various occupancy types, categorized in such a way as to correlate with National Fire Protection Association (NFPA) fire analysis data;

• Contractual relationships with various client types (with whom do they contract for the work, i.e., project owners, project developers, project architects, interior designers, general contractors, other consultants, etc.);

• Experience with building permitting and specific code requirements (practices, requests from clients, experience with other practitioners);

• Frequency of encounters with unregulated building modifications; and

• Attitudes about specialized interior design knowledge and expertise.

Similar instruments, in addition to other research methodologies, may be used to better understand other participants and their interactions in the selection and procurement of interior space content.

Another area of research that is a necessary corollary of this study is an examination of alternate sources of data for the gaps that currently exist in traditional sources for cases of harm. As this study has shown, by reevaluating the search parameters, based traditionally on practitioner type, and instead focusing on the potential for harm related to the interior space content as a scope of work that typically falls within the purview of interior designers regardless of the qualifications or title of the practitioner, additional information and perspective may become apparent.
By way of example, as an extension of this work, the author briefly examined a single, well known fire from the list of twenty-eight fires identified in Chapter Three as proof that interior finish and content are consistent, direct contributors to loss of life and property. Out of 118 consolidated law suits involving product suppliers, contractors, architects, interior decorators, and others listed as “design services and specifications” for the MGM Grand Hotel in Las Vegas, twenty-nine suits – twenty-five percent of the total – directly relate to the interior space content customarily provided by an interior designer.\textsuperscript{104} Those 118 suits totaled $11,972,500 in settlements at the time of the publication.\textsuperscript{105} Another ten remained unsettled and five were dismissed at the time of publication.\textsuperscript{106} That equals thirteen percent of the total consolidation settlement of $138,057,500 described in the case document.\textsuperscript{107} (See Appendix D for a complete listing of the suits examined and those items identified by the author as interior space content related.) This brief examination, certainly not performed with any knowledge, experience, or expertise in the law, illustrates that case law relating to the potential for harm in interior design practice exists; it may simply be in a form that has been previously overlooked.

\textsuperscript{104} In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983). Legal research using professional version of WestlawNext and copy of search result were provided by legal Danny Clearman (attorney, research assistant) in personal email correspondence with the author, June 4, 2013.

\textsuperscript{105} Ibid.

\textsuperscript{106} Ibid.

\textsuperscript{107} Ibid.
Given these findings, it may be possible to make similar re-examinations of data or sources for data that were previously found to be unproductive or even unfeasible in the documentation of harm. Discussed in detail in Chapter Two, these sources include: case law, with a new focus on interior design related content rather than practitioner; professional liability insurance data, especially with respect to interior design practitioners and/or architectural practitioners who practice interior design; and manufacturer’s internal claim settlements with regard to “off line” corrections made in the interest in maintaining valuable business relationships with designers and end users. In addition, areas of consumer complaints, claims to workers compensation agencies regarding related workplace injuries, Americans with Disability Acts (ADA) claims settlements processed through the United States Department of Justice, and even ethics violations by practitioners processed through the interior design professional associations are ripe for examination.

It is hoped, too, that this work might kindle a dialogue between the academy and the interior design profession, focused on the creation of a body of case studies from the field that function to simultaneously build the interior body of knowledge and expand the evidence-based research approach to the everyday nature of practice.

What is certain is that there is more to come.
Preface


Chapter One

Introduction | Contextual Construction


Johnson, Terrence J. *Professions and power (Study in sociology).* London: Macmillan, 1972.


Fighting Fire with Fire: Redefining the interior design value proposition

Setser


Links embedded within this document were also used to compile data and are listed below:


Fighting Fire with Fire:
Redefining the interior design value proposition


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1 An error in the online article mis-referenced Wilson Associates in Dallas, TX, directing readers to an incorrect website. The information listed includes the author’s own investigative source.
Torres, David L. “What, if anything, is professionalism?: Institutions and the problem of change.” 

Walker, Stephen P. “The defense of professional monopoly: Scottish chartered accountant and ‘satellites in the accountancy firmament’ 1854-1914.” 

Wilensky, Harold L. “The professionalization of everyone?” 


**Chapter Two**

**Study Design | Methodological Approach**


**Chapter Three**

**Evidence of Harm | The Implication of Interior Space Content**


Fighting Fire with Fire: 
Redefining the interior design value proposition


http://www.nfpa.org/assets/files//MbrSecurePDF/OS.Campus.PDF.


In addition to the cited material listed above for Chapter Three, the following fire investigation reports, case studies, alert bulletins, and other related reports were reviewed for the case study portion of the analysis:


Fighting Fire with Fire: Redefining the interior design value proposition


In addition to the cited material listed above for Chapter Three, the following statistical reports and other information were used to compile the data in the analysis of annualized data:


Chapter Four
(Mis)Alignment of Mitigation | The Current Interior Design Content Delivery System


Fighting Fire with Fire: Redefining the interior design value proposition


General References


Appendices

Appendix A | List of NFPA Fire Incidents Examined
Appendix B | Determination of Items First Ignited: Classification as Interior Space Content
Appendix C | Survey Instrument: Survey About Interior Design Services
Appendix D | MGM Grand Hotel Fire Litigation: Consolidation Action
Appendix A

List of NFPA Fire Incidents Examined
Assembly Occupancy

Mercantile

1. Mall Fire, Brunswick, GA, 9/20/83.
3. Automotive Service Station/Gas Explosion, Portland, ME, 5/23/86, 1 fatality.
4. Shopping Mall, Logan, PA, 12/16/94.
5. Bulk Retail Store Fire, Quincy, MA, 5/23/95.
6. Mercantile, Chesapeake, VA, 3/18/96, 2 fatalities.
8. Mercantile, Branford, CT, 11/28/96, 1 fatality.
10. Bulk Retail Store Fire, Tempe, AZ, 3/19/98.
11. Supermarket, Phoenix, AZ, 3/14/01, 1 fatality.

Nightclubs/Dance halls

1. Night Club Fire, New Orleans, LA, 6/24/73, 32 fatalities.
3. Private Club, Indianapolis, IN, 2/5/92, 3 fatalities.
5. The Station nightclub, West Warwick, Rhode Island 2/20/03, 100 fatalities.

Restaurants

1. Restaurant, Seaside Park, NJ, 7/30/85.
2. Restaurant, Derby, CT, 12/6/85, 6 fatalities.
3. Restaurant, Boston, MA, 8/31/95.
Schools

Churches
1. Church, St. Louis, MO, 4/28/94.
2. Church, Lake Worth, TX, 2/15/99, 3 fatalities.

Stadiums
2. Stadium Fires (two), 10/13/93.

Amusement Parks
1. Amusement Facility, Six Flags, Jackson, NJ, 5/11/84, 8 fatalities.

Libraries
Health Care Occupancies

Board and Care

1. Eau Claire, WI, 2/7/83, 6 fatalities.
2. Worcester, MA, 4/19/83, 7 fatalities.
3. Gwinnett County, GA, 8/31/83, 8 fatalities.
4. Bessemer, AL, 9/19/90, 4 fatalities.
6. Detroit, MI, 6/2/92, 10 fatalities.
8. Mississauga, Canada, 3/21/95, 7 fatalities.
10. Laurinburg, NC, 3/17/96, 8 fatalities.
12. Harveys Lake, PA, 5/13/97, 10 fatalities.

Hospitals

1. Hospital, Osceola, MO, 12/2/74
2. Hospital, Winston-Salem, NC, 8/12/84.
3. Hospital, Riverside, CA, 11/28/86, 5 fatalities.
4. Hospital, St. Jerome, Canada, 1/29/89.
5. Hospital (sprinkler success), Weymouth, MA, 1/24/93.
6. Hospital, Brooklyn, NY 9/1/93.
7. Hospital, Petersburg, VA, 12/31/94, 5 fatalities.
8. Hospital (sprinkler success), Hyannis, MA, 10/16/96.
Nursing Homes

1. Nursing Home, Beaumont, Little Rock, AK, 1/12/84, 2 fatalities.
2. Nursing Home, Merrymount, Quincy, MA, 1/16/85.
3. Hospice, Southfield, MI, 12/15/85
5. Nursing Home, Norfolk, VA, 10/5/89, 12 fatalities.
7. Nursing Home, Woburn, MA, 10/30/92.
8. Nursing Home (sprinkler success), Ashland, KY, 6/2/93.
9. Nursing Home, Hartford, CT, 2/26/03.
Non-residential Properties

High-rise
1. Prudential Building, Boston, MA, 1/2/86.
2. Alexis Nihon Plaza, Montreal, Canada, 10/26/86.
5. Rockefeller Center, New York City, 10/10/96.

Office and Miscellaneous
2. Union Bank Building, Los Angeles, CA, 7/18/88.
3. Office Building, Atlanta, GA, 6/30/89.
4. Brackenridge, PA, 12/20/91, 4 fatalities.
7. Commercial Building, Marks, MS 8/29/98, 2 fatalities.
Residential Occupancies

Apartments
1. Apartment Complex, Dallas, TX, 3/21/83.
2. Apartment Complex, Cobb County, GA, 5/2/85.
3. Apartment (sprinkler success), Greenburgh, NY, 11/1/85 and Apartment (sprinkler success), Dover, NH, 12/28/85.
4. Residential Fire, Biloxi, MS, 10/20/86, 2 fatalities.
5. Apartment, Manhattan, NY, 11/1/88, 4 fatalities.
7. Elderly Housing, Johnson City, TN, 12/24/89.
8. High-rise Apartment, North York, ON, 1/6/95, 6 fatalities.

Dormitories
1. Dormitory, Providence, RI, 12/13/77
2. Dormitory, Williamsburg, VA, 1/20/83.
4. Dormitory, Franklin, MA, 10/25/95.
5. Fraternity House Fire, Chapel Hill, NC, 5/12/96, 5 fatalities.

Lodging/Rooming House
5. Bed and Breakfast, Allenstown, NH, 7/17/01, 1 fatality.
Hotel/Motel

1. Hyatt Hotel, Rosemont, IL, 4/2/73
2. Sedgwick Hotel, Bath, Maine, 9/9/73, 4 fatalities.
3. Holiday Inn, Meadville, PA, 10/20/73
4. Orlando South Travel Lodge, Pine Castle, FL, 1/9/74
5. Cavalier Beachfront Hotel, Virginia Beach, VA, 9/8/74
6. Howard Johnson, Peoria, IL, 2/13/75
7. University Tower Hotel, Seattle, WA, 3/11/75
8. Pathfinder Hotel, Fremont, NE, 1/10/76, 20 fatalities.
9. Motor Lodge, Concord, MA, 12/4/76
10. Filipinas Hotel, Manila, Philippines, 11/14/77, 47 fatalities.
11. Southampton Princess Hotel, Bermuda, 12/1/77, 3 fatalities.
16. MGM Grand, Las Vegas, NV, 11/21/80
18. Holiday Inn, Kearney, NE, 1/16/81
19. Hilton, Las Vegas, NV, 2/10/81, 8 fatalities.
20. Royal Beach Hotel, Chicago, IL, 3/14/81, 19 fatalities.
21. Westchase Hilton Hotel, Houston, TX, 3/6/82, 12 fatalities.
22. Ramada Inn, Fort Worth, TX, 6/14/83, 5 fatalities.
23. Travel Master Inn Motel, Dayton, OH, 11/23/83, 1 fatality.
24. Westin Hotel, Boston, MA, 1/2/84.
27. Dupont Plaza, San Juan, PR, 12/31/86, 97 fatalities.
28. Sheraton, Boston, MA, 8/30/89.
29. Super 8 Motel, Hagerstown, MD, 2/18/90, 4 fatalities.
30. Fontana Hotel, Miami Beach, FL, 4/6/90, 9 fatalities.
31. Howard Johnson, Cambridge, MA, 6/10/90, 1 fatality.
32. Paxton Hotel, Chicago, IL, 3/16/93, 20 fatalities.
33. Residential Hotel, Reno, NV, 10/31/06, 12 fatalities.
Appendix B

Determination of Items First Ignited: Classification as Interior Space Content
Items First Ignited

The following items were included in the NFPA fire analysis statistics with regard to items first ignited for each occupancy type included in the study. Those notated with a “✔” indicate items that are considered by the author to fall within the normal and customary purview and practice of an interior design practitioner as described in the language set forth in Definition of Interior Design, published in 2004 by the Council for Interior Design Qualification (CIDQ), and are therefore included in the author’s calculations and analysis of annualized fire data.

Hotels and Motels

Cooking materials, including food
Rubbish, trash, or waste
Unclassified item first ignited
✔ Mattress or bedding
   Electrical wire or cable insulation
✔ Linen other than bedding
   Flammable or combustible liquids or gases, piping or filter
   Structural member or framing
✔ Appliance housing or casing
   Magazine, newspaper, or writing paper
   Dust, fiber, lint, including sawdust or excelsior
   Clothing
✔ Unclassified furniture or utensil
   Unclassified organic materials
   Box, carton, bag, basket, or barrel
   Other known item first ignited
Dormitories, Fraternities, Sororities, and Barracks
Cooking materials, including food
Rubbish, trash, or waste
Unclassified item first ignited
✔ Household utensils
   Magazine, newspaper, or writing paper
   Flammable or combustible liquids and gases, piping or filter
✔ Appliance housing or casing
   Box, carton, bag, basket, or barrel
   Other known item first ignited

Religious and Funeral Properties
Cooking materials, including food
Unclassified item
Flammable or other combustible liquids or gases, piping or filter
Electrical wire or cable insulation
Structural member or framing
Rubbish, trash, or waste
Exterior roof covering or finish
Magazine, newspaper or writing paper
Exterior wall covering or finish
Box, carton, bag, basket, or barrel
Unclassified structural component or finish
✔ Interior wall covering, excluding drapes
✔ Appliance housing or casing
✔ Household utensil
   Multiple items first ignited
   Insulation within structural area
   Box, carton, bag, basket or barrel
✔ Interior ceiling cover or finish
   Other known item
Assembly Properties
(excluding Eating and Drinking Establishments and Religious and Funeral Properties)

Confined Cooking fire
Electrical wire or cable insulation
Unclassified
Structural member or framing
Rubbish, trash, or waste
Confined fuel burner or boiler fire
Exterior wall covering or finish
Exterior roof covering or finish
Flammable or combustible liquid or gas, filter or piping
Magazine, newspaper or writing paper
Unclassified structural component or finish
Rolled or wound material

✓ Interior wall covering, excluding drapes
   Insulation within structural area
✓ Linen, other than bedding
   Cooking materials, including food
   Confined chimney or flue fire
✓ Interior ceiling cover or finish
   Multiple items first ignited
✓ Appliance housing or casing
   Dust, fiber, lint, sawdust, or excelsior
✓ Floor covering, rug, carpet or mat
   Box, carton, bag, basket, or barrel
✓ Upholstered furniture or vehicle seats
   Light vegetation, including grass
   Clothing
✓ Unclassified furniture or utensils
   Other known or confined item
   Contained trash or rubbish fire
Eating and Drinking Establishments
Cooking materials, including food
Flammable or other combustible liquids or gases, piping or filter
Electrical wire or cable insulation
Unclassified item first ignited
Rubbish, trash, or waste
Structural member or framing
Exterior wall covering or finish
✔ Appliance housing or casing
  Box, carton, bag, basket, or barrel
✔ Exterior roof covering or finish
✔ Linen other than bedding
  Unclassified structural component or finish
  Unclassified organic materials
  Other known item first ignited

Educational Properties: Day Care Centers
Cooking materials, including food
Electrical wire or cable insulation
Other item first ignited
✔ Household utensils
✔ Appliance housing or casing
  Flammable and combustible liquids and gases, piping and filter
  Rubbish, trash, or waste
  Box, carton, bag, basket, barrel
  Structural member or framing
✔ Unclassified furniture, utensils
✔ Linen other than bedding
  Unclassified organic materials
  Other known item first ignited
Educational Property: Nursery, Elementary, Middle, Junior, and High Schools

- Rubbish, trash, or waste
- Magazine, newspaper or writing paper
- Unclassified item first ignited
- Cooking materials, including food
- Electrical wire or cable insulation
- Rolled, or wound materials
- Flammable or combustible liquids or gases, piping or filter
- Box, carton, bag, basket or barrel
- Multiple items first ignited
- Clothing
- Other known item first ignited

Educational Property: College Classroom Buildings and Adult Education Centers

- Cooking materials, including food
- Unclassified items first ignited
- Rubbish, trash, or waste
- Electrical wire or cable insulation
- Magazine, newspaper, writing paper
- Flammable and combustible liquids and gases, piping and filter
- Box, carton, bag, basket, barrel
- Multiple items first ignited

✔ Household utensils
✔ Appliance housing or casing
  - Insulation within structural area
  - Exterior roof covering or finish
  - Dust, fiber, lint, including sawdust or excelsior
  - Structural member or framing
  - Rolled or wound material
  - Other known item first ignited
Nursing Homes
Cooking materials, including food
Unclassified item first ignited
Electrical wire or cable insulation
✔ Linen other than bedding
✔ Appliance housing or casing
✔ Rubbish, trash, or waste
✔ Mattress or bedding
   Clothing
✔ Household utensils
✔ Flammable or combustible liquid or gas, piping or filter
   Dust, fiber, lint, including sawdust or excelsior
   Unclassified soft goods or wearing apparel
   Magazine, newspaper, or writing paper
Other known item first ignited

Hospital or Hospice Facility
Confined cooking equipment
Electrical wire or cable insulation
Unclassified item first ignited
Confined heating equipment
✔ Mattress and bedding material
✔ Linen; other than bedding
   Dust, fiber, lint, including sawdust or excelsior
   Flammable or combustible liquid or gas, filter or piping
   Insulation within structural area
   Exterior roof covering or finish
   Cooking materials, including food
   Rubbish, trash, or waste
✔ Appliance housing or casing
   Structural member or framing
   Clothing
   Transformer or transformer fluids
Box, carton, bag, basket, barrel

- Unclassified furniture, utensils
- Magazine, newspaper, writing paper
- Conveyor belt, drive belt, V-belt
- Contained trash or rubbish fires
- Other known confined fire
- Other known item

**Clinic or Doctor's Office**
- Confined cooking equipment
- Electrical wire or cable insulation
- Unclassified item first ignited
- Confined heating equipment
- Structural member or framing
- Flammable or combustible liquid or gas, filter or piping
- Exterior wall covering or finish
- Insulation within structural area
- Exterior roof covering or finish

✔ Interior wall covering, excluding drapes
- Magazine, newspaper, writing paper
- Rubbish, trash, or waste
- Unclassified structural component or finish

✔ Appliance housing or casing
- Box, carton, bag, basket, barrel

✔ Cabinetry, including built-in
- Light vegetation including grass
- Unclassified organic materials

✔ Linen; other than bedding
✔ Unclassified furniture, utensils
✔ Decoration
✔ Interior ceiling cover or finish
✔ Mattress and bedding material
- Multiple items first ignited
- Transformer or transformer fluids
Dust, fiber, lint, including sawdust or excelsior
Unclassified storage supplies
✔ Upholstered furniture or vehicle seat
  Cooking materials, including food
  Contained trash or rubbish fires
  Other known confined fire
  Other known item

Residential Board and Care
  Cooking materials, including food
  Unclassified item first ignited
✔ Household utensils
  Electrical wire or cable insulation
✔ Appliance or casing
  Clothing
  Flammable or combustible liquids or gases, piping or filter
  Rubbish, trash, or waste
✔ Mattress or bedding
✔ Linen other than bedding
✔ Unclassified furniture or utensil
  Other known item first ignited
Stores and Other Mercantile Properties
Cooking materials, including food
Electrical wire or cable insulation
Flammable and combustible liquids and gases, piping and filter
Rubbish, trash, or waste
Unclassified item first ignited
Structural member or framing
Box, carton, bag, basket, barrel
Exterior wall covering or finish
Clothing
Exterior roof covering or finish
Multiple items first ignited
Dust, fiber, lint, including sawdust or excelsior
✔ Linen other than bedding
Unclassified structural component or finish
✔ Appliance housing or casing
  Magazine, newspaper or writing paper
  Insulation within structural area
✔ Interior wall covering, excluding drapes
✔ Interior ceiling cover or finish
  Other known item

Office Properties
Cooking materials, including food
Electrical wire or cable insulation
Rubbish, trash, or waste
Unclassified item first ignited
Magazine, newspaper or writing paper
Flammable and combustible liquids and gases, piping and filter
Structural member or framing
Exterior wall covering or finish
✔ Appliance housing or casing
  Exterior roof covering or finish
  Insulation within structural area
Box, carton, bag, basket, or barrel
Unclassified organic materials
Unclassified structural component or finish
Multiple items first ignited
Other known item first ignited

**Multi-Family Properties**
Cooking materials, including food
Rubbish, trash, or waste
Unclassified item first ignited
✔ Household utensils
   Flammable or combustible liquids or gases, piping or filter
✔ Appliance housing or casing
   Electrical wire or cable insulation
✔ Mattress or bedding
   Structural member or framing
   Magazine, newspaper, or writing paper
   Clothing
✔ Unclassified furniture or utensils
   Other known item first ignited
✔ Upholstered furniture
   Multiple items ignited
   Unclassified soft goods or wearing apparel
✔ Cabinetry
   Unclassified structural component or finish
✔ Interior wall covering, excluding drapes
Appendix C

Survey Instrument: Survey About Interior Design Services
Thank you for participating in our survey!

This survey is intended to gather information about the way in which interior design services and interior content are provided in the United States and the types of projects that involve interior design services. We also hope to better understand the ways in which architects and interior designers approach the application of building and life-safety codes as a project develops. As a provider of architectural and/or interior design services, your experience will be very helpful to our understanding your involvement in the design of interior space and of the relationship between architects and interior designers.

You should know that there are no right or wrong answers and that your responses will be treated confidentially. Survey results will not be traceable to individual respondents or their employers.

If you have any questions while completing the survey, please contact Katherine Setser at (615) 945-1510 or setserks@mail.uc.edu. If you have any questions about your rights as a research subject, you may contact the University of Cincinnati Institutional Review Board (IRB) by mail at University Hall, Suite 300, 51 Goodman Drive, University of Cincinnati Medical Center, PO Box 210567, Cincinnati OH 45221-0567, by phone at (513) 558-5259, or by e-mail at irb@ucmail.edu. This study (IRB #UC000) was approved by the IRB on [insert date here].

Survey results will be made available to participants. Information on how to access the data will be provided at the end of the survey.

Please tell us about your and your design practice.

In what state is your or your firm's design practice based?

**State:**  

---

Appendix C
**University of Cincinnati: Survey about Interior Design Services**

If you or your firm has provided interior design services in other states during the past year, please indicate in which ones. Please select all that apply.

<table>
<thead>
<tr>
<th>State Abbreviation</th>
<th>State Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL</td>
<td>Alabama</td>
</tr>
<tr>
<td>AK</td>
<td>Alaska</td>
</tr>
<tr>
<td>AS</td>
<td>American Samoa</td>
</tr>
<tr>
<td>AZ</td>
<td>Arizona</td>
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<tr>
<td>AR</td>
<td>Arkansas</td>
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<tr>
<td>CA</td>
<td>California</td>
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<tr>
<td>CO</td>
<td>Colorado</td>
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<tr>
<td>CT</td>
<td>Connecticut</td>
</tr>
<tr>
<td>DE</td>
<td>Delaware</td>
</tr>
<tr>
<td>DC</td>
<td>District of Columbia</td>
</tr>
<tr>
<td>FM</td>
<td>Federated States of Micronesia</td>
</tr>
<tr>
<td>FL</td>
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<tr>
<td>GA</td>
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<tr>
<td>GU</td>
<td>Guam</td>
</tr>
<tr>
<td>HI</td>
<td>Hawaii</td>
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<td>ID</td>
<td>Idaho</td>
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<td>Indiana</td>
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<td>Iowa</td>
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<tr>
<td>NY</td>
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<td>OH</td>
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<tr>
<td>OK</td>
<td>Oklahoma</td>
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<tr>
<td>OR</td>
<td>Oregon</td>
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<td>Pennsylvania</td>
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<td>PR</td>
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<td>Utah</td>
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<td>Vermont</td>
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<tr>
<td>VI</td>
<td>Virgin Islands</td>
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<td>Virginia</td>
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<td>WA</td>
<td>Washington</td>
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<tr>
<td>WV</td>
<td>West Virginia</td>
</tr>
<tr>
<td>WI</td>
<td>Wisconsin</td>
</tr>
<tr>
<td>WY</td>
<td>Wyoming</td>
</tr>
</tbody>
</table>

Which of the following most closely describes your area of expertise with the firm?

- Interior Design
- Architecture
### University of Cincinnati: Survey about Interior Design Services

**How long have you practiced architecture?**
- [ ] 1-3 years
- [ ] 4-7 years
- [ ] 8-10 years
- [ ] 11-15 years
- [ ] 16-20 years
- [ ] more than 21 years

**How long have you practiced interior design?**
- [ ] 1-3 years
- [ ] 4-7 years
- [ ] 8-10 years
- [ ] 11-15 years
- [ ] 16-20 years
- [ ] more than 21 years

**Are you personally registered to practice architecture in the state where your firm's design practice is based?**
- [ ] Yes
- [ ] No

**Are you personally registered to practice interior design in the state where your firm's design practice is based?**
- [ ] Yes
- [ ] No
University of Cincinnati: Survey about Interior Design Services

**Are you currently registered to practice in other states?**

- [ ] Yes
- [ ] No

**Please indicate the states where you are registered. Please select all that apply.**

- [ ] AL Alabama
- [ ] AK Alaska
- [ ] AS American Samoa
- [ ] AZ Arizona
- [ ] AR Arkansas
- [ ] CA California
- [ ] CO Colorado
- [ ] CT Connecticut
- [ ] DE Delaware
- [ ] DC District of Columbia
- [ ] FM Federated States of Micronesia
- [ ] FL Florida
- [ ] GA Georgia
- [ ] GU Guam
- [ ] HI Hawaii
- [ ] ID Idaho
- [ ] IL Illinois
- [ ] IN Indiana
- [ ] IA Iowa
- [ ] KS Kansas
- [ ] KY Kentucky
- [ ] LA Louisiana
- [ ] ME Maine
- [ ] MH Marshall Islands
- [ ] MD Maryland
- [ ] MA Massachusetts
- [ ] MI Michigan
- [ ] MN Minnesota
- [ ] MS Mississippi
- [ ] MO Missouri
- [ ] MT Montana
- [ ] NE Nebraska
- [ ] NV Nevada
- [ ] NH New Hampshire
- [ ] NJ New Jersey
- [ ] NM New Mexico
- [ ] NY New York
- [ ] NC North Carolina
- [ ] ND North Dakota
- [ ] MP Northern Marianas Islands
- [ ] OH Ohio
- [ ] OK Oklahoma
- [ ] OR Oregon
- [ ] PW Palau
- [ ] PA Pennsylvania
- [ ] PR Puerto Rico
- [ ] RI Rhode Island
- [ ] SC South Carolina
- [ ] SD South Dakota
- [ ] TN Tennessee
- [ ] TX Texas
- [ ] UT Utah
- [ ] VT Vermont
- [ ] VI Virgin Islands
- [ ] WA Washington
- [ ] WV West Virginia
- [ ] WI Wisconsin
- [ ] WY Wyoming

**What is the job title for your current position?**
### University of Cincinnati: Survey about Interior Design Services

#### On average, how many architectural and/or interior design projects does your firm work on per year?

Number of projects: ____________

#### Does your firm carry professional liability insurance (also referred to as errors & omissions insurance)?

- [ ] Yes
- [ ] No
- [ ] I don’t know

### Section 2: Interior Design Services

Please tell us about your firm's involvement with interior design services.

#### Does your firm provide in-house interior design services?

- [ ] Yes, as a stand-alone service (interior design services only)
- [ ] Yes, in addition to architectural services (architecture + interior design services)
- [ ] No (architectural services only)

### How would you describe the integration of architecture and interior design services within your firm?

- [ ] Highly integrated (architecture and interior design team members always collaborate on projects, often from the start)
- [ ] Largely integrated (architecture and interior design team members often collaborate on projects, usually from the start)
- [ ] Partially integrated (architecture and interior design team members sometimes work on the same project with intermittent collaboration)
- [ ] Slightly integrated (architecture and interior design team members sometimes work on the same project with little collaboration)
- [ ] Not integrated (architecture and interior design team members rarely work on the same project)
## University of Cincinnati: Survey about Interior Design Services

### Which of the following in-house interior design services do you or your firm provide? Please select all that apply.

- [ ] Interior analysis, including programming and schematic design
- [ ] Furniture inventory
- [ ] Development of furniture plans
- [ ] Development of furniture budget
- [ ] Selection and specification of interior finishes
- [ ] Selection and specification of interior lighting fixtures
- [ ] Coordination of electrical, communication, and lighting with furniture and/or other interior content
- [ ] Preparation of furniture bid documents and/or management of bidding process
- [ ] Tracking and expediting of furniture order(s)
- [ ] Preparation of furniture installation drawings
- [ ] Coordination and/or supervision of furnishing installation
- [ ] Preparation of interior finish punchlist
- [ ] Preparation of furnishing punchlist
- [ ] Other (please describe):

### Which of the following interior design professionals does your firm employ? Please select all that apply.

- [ ] Interior Decorator
- [ ] Interior Designer
- [ ] Registered/Certified Interior Designer
- [ ] Space Planner
- [ ] Architect
- [ ] Other (please describe):

---

**Appendix C**
### University of Cincinnati: Survey about Interior Design Services

<table>
<thead>
<tr>
<th>Question</th>
<th>Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is one or more of your firm's interior design professionals an NCIDQ certificate holder?</td>
<td>☐ Yes  ☐ No  ☐ I don't know</td>
</tr>
<tr>
<td>Are you personally an NCIDQ certificate holder?</td>
<td>☐ Yes  ☐ No</td>
</tr>
<tr>
<td>Do you plan to take the NCIDQ Examination?</td>
<td>☐ Yes  ☐ No</td>
</tr>
<tr>
<td>In the past 12 months, have you or your firm hired an interior design consultant to assist on a project(s)?</td>
<td>☐ Yes  ☐ No</td>
</tr>
</tbody>
</table>
University of Cincinnati: Survey about Interior Design Services

Were the interior design consultant(s) your firm hired in the past year NCIDQ certificate holders? For each type of design consultant hired, please make a selection in the chart below.

- Select **YES** if they held an NCIDQ certificate.
- Select **NO** if they did not hold an NCIDQ certificate.
- If you are not sure, select **I DON’T KNOW**.
- Select **NOT APPLICABLE** if you have not engaged a particular consultant type.

<table>
<thead>
<tr>
<th>Consultant Type</th>
<th>NCIDQ Certified?</th>
<th>NCIDQ Certified?</th>
<th>I don’t know</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interior Designer</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Interior Decorator</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Architect</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Space Planner</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Registered/Certified Interior Designer</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Other</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

Which of the following forms of contract did you use when hiring the interior design consultant(s) in the past year? Please select all that apply.

- Standardized AIA contract for interior design services
- Standardized ASID/IBD contract for interior design services
- Standardized form, customized for your firm
- Letter of agreement, prepared by your firm
- Purchase order, prepared by your firm
- Contract prepared by the interior designer
- Purchase order, prepared by the interior designer
- Work order
- Verbal agreement, no written agreement
- Other (please describe):

Other (please describe):
### University of Cincinnati: Survey about Interior Design Services

**Does your firm require that interior design consultants hired by your firm carry professional liability insurance (also referred to as errors and omission insurance)?**

- [ ] Yes
- [ ] No
- [ ] I don't know

### Section 3: Design Projects

Please tell us about your design projects.

**In the last 12 months, have you or your firm worked on residential projects that include the following?**

- Single- or two-family homes
- Apartments in buildings that house three or more families
- Condominiums in buildings that house three or more families

- [ ] Yes
- [ ] No

Please select the number that comes nearest to the percentage of your total residential work that this project type represents. Be sure all three boxes add up to 100%.

<table>
<thead>
<tr>
<th>Project Type</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single- or two-family homes</td>
<td></td>
</tr>
<tr>
<td>Apartments in buildings that house three or more families</td>
<td></td>
</tr>
<tr>
<td>Condominiums in buildings that house three or more families</td>
<td></td>
</tr>
</tbody>
</table>
Consider the residential projects you or your firm have worked on in the past year. For each project type listed in the chart below, please indicate your selection for each of the following items:

1. **NUMBER OF PROJECTS THAT ARE 6 OR MORE STORIES:** Please select the number of each project type where the building is six (6) or more stories in height.

2. **PROVISION OF INTERIOR DESIGN SERVICES:** Please select the way in which interior design services were typically provided for these projects. If you did not work on this type of project, select **Not Applicable**.

*For the purposes of this survey interior design services include:*

- **Interior analysis, including programming & schematic design**
- **Furniture inventory**
- **Development of furniture plans**
- **Development of furniture budget**
- **Selection and specification of interior finishes**
- **Selection and specification of interior lighting fixtures**
- **Coordination of electrical, communication, & lighting with furniture and/or other content**
- **Preparation of furniture bid documents and/or management of bidding process**
- **Tracking and expediting of furniture order(s)**
- **Preparation of furniture installation drawings**
- **Coordination and/or supervision of furnishing installation**
- **Preparation of interior finish punchlist**
- **Preparation of furnishing punchlist**
- **Other related services**
University of Cincinnati: Survey about Interior Design Services

3. **COORDINATION WITH ARCHITECTURAL SERVICES**: Please select the description that most typically represents the level of coordination between interior design services and the base building architectural design services. *If you did not work on this type of project, select Not Applicable.*

<table>
<thead>
<tr>
<th></th>
<th># Projects w/6 or More Stories</th>
<th>Provision of Interior Design Services</th>
<th>Coordination w/Architectural Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single- &amp; two-family homes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Apartments</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Condominiums</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In the last 12 months, have you or your firm worked on commercial projects that include the following?

- Hotels/Motels
- Rooming and Boarding projects (short-term residential housing projects)
- Public Assembly occupancies (meeting, assembly, entertainment, auditoriums, club rooms, dance halls, and/or exhibit spaces for more than 50 persons, or special amusement spaces of any size)
- Eating and Drinking establishments
- Office projects (except medical office buildings)
- Retail/Mercantile projects
- Religious and Funeral projects

☐ Yes
☐ No
# University of Cincinnati: Survey about Interior Design Services

Please select the number that comes nearest to the percentage of your total commercial work that this project type represents. Be sure all seven boxes add up to 100%.

<table>
<thead>
<tr>
<th>Project Type</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotels/Motels</td>
<td></td>
</tr>
<tr>
<td>Rooming and Boarding projects (short-term residential housing projects)</td>
<td></td>
</tr>
<tr>
<td>Public Assembly occupancies (meeting, assembly, entertainment, auditoriums, club rooms, dance halls, and/or exhibit spaces for more than 50 persons, or special amusement spaces of any size)</td>
<td></td>
</tr>
<tr>
<td>Eating and Drinking establishments</td>
<td></td>
</tr>
<tr>
<td>Office projects (except medical office buildings)</td>
<td></td>
</tr>
<tr>
<td>Retail/Mercantile projects</td>
<td></td>
</tr>
<tr>
<td>Religious and Funeral projects</td>
<td></td>
</tr>
</tbody>
</table>
University of Cincinnati: Survey about Interior Design Services

Consider the commercial projects you or your firm have worked on in the past year. For each project type listed in the chart below, please indicate your selection for each of the following items:

1. **NUMBER OF PROJECTS THAT ARE 6 OR MORE STORIES**: Please select the number of each project type where the building is six (6) or more stories in height.

2. **PROVISION OF INTERIOR DESIGN SERVICES**: Please select the way in which interior design services were typically provided for these projects. If you did not work on this type of project, select *Not Applicable*.

For the purposes of this survey interior design services include:

- Interior analysis, including programming & schematic design
- Furniture inventory
- Development of furniture plans
- Development of furniture budget
- Selection and specification of interior finishes
- Selection and specification of interior lighting fixtures
- Coordination of electrical, communication, & lighting with furniture and/or other content
- Preparation of furniture bid documents and/or management of bidding process
- Tracking and expediting of furniture order(s)
- Preparation of furniture installation drawings
- Coordination and/or supervision of furnishing installation
- Preparation of interior finish punchlist
- Preparation of furnishing punchlist
- Other related services
### University of Cincinnati: Survey about Interior Design Services

3. **COORDINATION WITH ARCHITECTURAL SERVICES:** Please select the description that most typically represents the level of coordination between interior design services and the base building architectural design services. If you did not work on this type of project, select Not Applicable.

<table>
<thead>
<tr>
<th>Services</th>
<th># Projects w/6 or More Stories</th>
<th>Provision of Interior Design Services</th>
<th>Coordination w/Architectural Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotels/Motels</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Rooming/Boarding</td>
<td></td>
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<td></td>
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<tr>
<td>Public Assembly</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eating &amp; Drinking</td>
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<td></td>
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</tr>
<tr>
<td>Office</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail/Mercantile</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Religious &amp; Funeral</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In the last 12 months, have you or your firm worked on institutional projects that include the following?

- Educational projects (schools, universities, etc.)
- Healthcare facilities (hospitals, residential care facilities, medical office buildings)
- Nursing Homes and Other Residential Care for the Aged facilities
- Dormitories, Fraternities/Sororities, and Barracks

- [ ] Yes
- [ ] No
<table>
<thead>
<tr>
<th>Project Type</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Educational projects (schools, universities, etc.)</td>
<td></td>
</tr>
<tr>
<td>Healthcare facilities (hospitals, residential care facilities, medical office buildings)</td>
<td></td>
</tr>
<tr>
<td>Nursing Homes and other Residential Care for the Aged facilities</td>
<td></td>
</tr>
<tr>
<td>Dormitories, Fraternities/Sororities, and Barracks</td>
<td></td>
</tr>
</tbody>
</table>
University of Cincinnati: Survey about Interior Design Services

Consider the institutional projects you or your firm have worked on in the past year. For each project type listed in the chart below, please indicate your selection for each of the following items:

1. **NUMBER OF PROJECTS THAT ARE 6 OR MORE STORIES**: Please select the number of each project type where the building is six (6) or more stories in height.

2. **PROVISION OF INTERIOR DESIGN SERVICES**: Please select the way in which interior design services were typically provided for these projects. If you did not work on this type of project, select Not Applicable.

   For the purposes of this survey interior design services include:

   - Interior analysis, including programming & schematic design
   - Furniture inventory
   - Development of furniture plans
   - Development of furniture budget
   - Selection and specification of interior finishes
   - Selection and specification of interior lighting fixtures
   - Coordination of electrical, communication, & lighting with furniture and/or other content
   - Preparation of furniture bid documents and/or management of bidding process
   - Tracking and expediting of furniture order(s)
   - Preparation of furniture installation drawings
   - Coordination and/or supervision of furnishing installation
   - Preparation of interior finish punchlist
   - Preparation of furnishing punchlist
   - Other related services
### University of Cincinnati: Survey about Interior Design Services

#### 3. COORDINATION WITH ARCHITECTURAL SERVICES: Please select the description that most typically represents the level of coordination between interior design services and the base building architectural design services. If you did not work on this type of project, select Not Applicable.

<table>
<thead>
<tr>
<th>Educational</th>
<th># Projects w/6 or More Stories</th>
<th>Provision of Interior Design Services</th>
<th>Coordination w/Architectural Services</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Healthcare Facilities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nursing Homes/Care for Aged</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dormitories, Fraternities/Sororities, &amp; Barracks</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Section 4: Design Projects

Please tell us about the ways in which you work.

**In the past 12 months, what percentage of the time did you work directly for the project owner, another design professional (architect, engineer or interior designer), a contractor, a project developer, or others? Please enter the percentages in the spaces provided. Be sure that the boxes add up to 100%.

- % Hired by/contracted directly with the general contractor
- % Hired by/contracted directly with the project owner
- % Hired by/contracted directly with another consultant
- % Hired by/contracted directly with interior designer
- % Hired by/contracted directly with the project engineer
- % Hired by/contracted directly with the project architect
- % Hired by/contracted directly with the project developer
- % Other

**In the past year, what percentage of your and your firm’s projects required a building permit because of its size, cost, or scope of work?**

[ ]
### University of Cincinnati: Survey about Interior Design Services

In the past 12 months, when a building permit was required for a project that you or your firm were responsible for, how have you and/or your firm provided documents with the necessary professional seals? Please enter the percentages in the spaces provided. Be sure that the boxes add up to 100%.

- [ ] Hire a consultant with necessary credentials (such as architect, engineer, interior designer, or other consultant)
- [ ] Submit plans directly to the codes officials; I (or my firm) employs at least one (1) qualified practitioner

<p>| | |</p>
<table>
<thead>
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</tbody>
</table>

In the past 12 months, have you or your firm modified the size or scope of a project so that a **building permit** is no longer required?

**Example 1**

The desired project size is 9,000 s.f. Regulations require that spaces greater than 5,000 s.f. must go through the building permit process. In order to simplify the process, the scope of the project was modified to complete the work as two separate projects, each under 5,000 s.f.

**Example 2**

The expected project cost is $45,000. Regulations require that projects costing more than $25,000 must go through the building permit process. In order to simplify the process, the scope of the project was modified to complete the work as two separate projects, each under $25,000.

- [ ] Yes
- [ ] No
University of Cincinnati: Survey about Interior Design Services

Would you like to add anything, provide examples, or discuss particular events in more detail?

In the past 12 months, have you or your firm been asked by a client (the person with whom you have a contract to perform the work, i.e., owner, architect, interior designer, etc.) to modify the size or scope of a project so that a building permit is no longer required?

- Yes
- No

Would you like to add anything, provide examples, or discuss particular events in more detail?
University of Cincinnati: Survey about Interior Design Services

Based on your *entire career experience*, how often would you say you modify a project so that a *building permit* is no longer required?

- 30 or more times per year
- 25-29 times per year
- 16-24 times per year
- 9-15 times per year
- 4-8 times per year
- 1-3 times per year
- Never

*How do you think your answer compares to the interior design industry as a whole?*

- Interior designers modify the size and scope of projects to avoid a building permit *more often* than my office does
- Interior designers modify the size and scope of projects to avoid a building permit *about the same* as my office does
- Interior designers modify the size and scope of projects to avoid a building permit *less often* than my office does

*Is there anything you’d like to add about your comparison with the interior design industry?*

---

*How do you think the frequency of your office’s project modification to avoid a *building permit* compares to the architectural industry as a whole?*

- Architects modify the size and scope of projects to avoid a building permit *more often* than my office does
- Architects modify the size and scope of projects to avoid a building permit *about the same* as my office does
- Architects modify the size and scope of projects to avoid a building permit *less often* than my office does
University of Cincinnati: Survey about Interior Design Services

Is there anything you’d like to add about your comparison with the architectural industry?

In the past 12 months, have you or your firm modified the size and/or scope of a project so that a specific code requirement no longer applies?

**Example 1**
The code requires that a space larger than 850 s.f. is to be treated as an assembly space, requiring additional exits from the room and fire rating of the surrounding walls, among other requirements. In order to reduce the additional costs and potential complications of an assembly space, the room size is modified to 840 s.f.

**Example 2**
The code requires that the floor below raised access flooring that is 12" high or greater must have floor drains installed. In order to reduce the additional costs and potential project delays involved in trenching the floor and installing and connecting the drain lines, the raised access flooring is detailed at 11-1/2" high.

- [ ] Yes
- [ ] No
University of Cincinnati: Survey about Interior Design Services

Would you like to add anything, provide examples, or discuss particular events in more detail?

In the past 12 months, have you or your firm been asked by a client (the person with whom you have a contract to perform the work, i.e., owner, architect, interior designer, etc.) to modify the size and/or scope of a project so that a specific code requirement no longer applies?

- Yes
- No

Would you like to add anything, provide examples, or discuss particular events in more detail?
**University of Cincinnati: Survey about Interior Design Services**

**Based on your entire career experience, how often would you say you modify a project so that a specific code requirement no longer applies?**

- [ ] 30 or more times per year
- [ ] 25-29 times per year
- [ ] 16-24 times per year
- [ ] 9-15 times per year
- [ ] 4-8 times per year
- [ ] 1-3 times per year
- [ ] Never

**How do you think your answer compares to the interior design industry as a whole?**

- [ ] Interior designers modify the size and scope of projects to avoid a specific code requirement more often than my office does
- [ ] Interior designers modify the size and scope of projects to avoid a specific code requirement about the same as my office does
- [ ] Interior designers modify the size and scope of projects to avoid a specific code requirement less often than my office does

**Is there anything you’d like to add about your comparison with the interior design industry?**

---

**How do you think the frequency of your office’s project modification to avoid a specific code requirement compares to the architectural industry as a whole?**

- [ ] Architects modify the size and scope of projects to avoid a specific code requirement more often than my office does
- [ ] Architects modify the size and scope of projects to avoid a specific code requirement about the same as my office does
- [ ] Architects modify the size and scope of projects to avoid a specific code requirement less often than my office does
University of Cincinnati: Survey about Interior Design Services

Is there anything you’d like to add about your comparison with the architectural industry?

When making site visits to projects, how often do you discover permanent physical modifications (walls, doors, windows, additions, etc.) made by others to a building that have likely occurred outside the oversight of either a qualified design professional or a building/fire code official?

- Constantly
- Frequently
- Infrequently
- Rarely
- Never

Is there anything you’d like to add about your experience with permanent physical building modifications?
University of Cincinnati: Survey about Interior Design Services

When making site visits to projects, how often do you discover changes to interior content (furniture, finishes, etc.) made by others that have likely occurred outside the oversight of either a qualified design professional or a building/fire code official?

Example 1
You visit a project after completion to find that file cabinets have been placed in an egress corridor that is not wide enough to provide the necessary clearance.

Example 2
You visit a project site after completion to find that the open office workstations have been reconfigured to accommodate extra staff but the aisleways are too narrow to meet ADA guidelines.

- Constantly
- Frequently
- Infrequently
- Rarely
- Never

Is there anything you'd like to add about your experience with interior content modifications?

Section 5: Design Professionals

Just a few more questions.

In this sequence of questions, we are interested in your selection of design professionals.
### University of Cincinnati: Survey about Interior Design Services

**Which of the following professionals would you chose as the best resource for the selection and specification of draperies, bedspreads, and other fabrics that meet NFPA 701 requirements in a high-rise hotel project?**

- [ ] Architect
- [ ] Specification Writer
- [ ] Interior Designer
- [ ] Interior Decorator
- [ ] Registered/Certified Interior Designer
- [ ] Engineer
- [ ] Space Planner
- [ ] Building/Fire Code Consultant
- [ ] Other (please describe):

---

**Which of the following professionals would you select as the best resource for the selection and specification of furnishings and upholstery fabric that must meet California Technical Bulletin (TB) 133 in a convention center project?**

- [ ] Space Planner
- [ ] Registered/Certified Interior Designer
- [ ] Engineer
- [ ] Interior Decorator
- [ ] Interior Designer
- [ ] Architect
- [ ] Specification Writer
- [ ] Building/Fire Code Consultant
- [ ] Other (please describe):

---


**University of Cincinnati: Survey about Interior Design Services**

**Which of the following professionals would you select as the best resource for the selection and specification of porcelain tile that requires an appropriate coefficient of friction (COF) in a multi-level bank lobby project?**

- [ ] Interior Decorator
- [ ] Specification Writer
- [ ] Space Planner
- [ ] Engineer
- [ ] Interior Designer
- [ ] Registered/Certified Interior Designer
- [ ] Architect
- [ ] Building/Fire Code Consultant
- [ ] Other (please describe):

**In the past 12 months, how have you most often referred to yourself when describing your work to others?**

- [ ] Interior Decorator
- [ ] Interior Designer
- [ ] Architect
- [ ] Interior Architect
- [ ] Registered/Certified Interior Designer
- [ ] Space Planner
**University of Cincinnati: Survey about Interior Design Services**

Please describe the reasons you would hire or recommend the hiring of an interior design professional (registered/certified interior designer, interior designer, decorator, space planner, etc.) on a project.

Please describe why you would *not* hire or recommend the hiring of an interior design professional (registered/certified interior designer, interior designer, decorator, space planner, etc.) on a project?
University of Cincinnati: Survey about Interior Design Services

Please describe the reasons you think an architect would hire or recommend the hiring of an interior design professional (registered/certified interior designer, interior designer, decorator, space planner, etc.) on a project?

Please describe the reasons you think an architect would not hire or recommend the hiring of an interior design professional (registered/certified interior designer, interior designer, decorator, space planner, etc.) on a project?

You are done! Thank you very much for your assistance!

If you wish to view the active results of this survey while in progress, click here. Your password for access to the survey results is: UCjan2013. For results upon completion of the study, contact Katherine Setser, setserks@mail.uc.edu.
University of Cincinnati: Survey about Interior Design Services

Is there anything you'd like to add?
Appendix D

MGM Grand Hotel Fire Litigation: Consolidation Action
Fighting Fire with Fire: Redefining the interior design value proposition

In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)

<table>
<thead>
<tr>
<th>NAME OF DEFENDANT</th>
<th>ALLEGATIONS</th>
<th>STATUS</th>
<th>DISPOSITION</th>
<th>DATE</th>
<th>SETTLEMENT AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Advance Mechanical, Inc.</td>
<td>Contractor-Seismic Joint</td>
<td>Non-MGM (“A”)</td>
<td>Settled</td>
<td>01/04/83</td>
<td>$500,000.00</td>
</tr>
<tr>
<td>3. Air Balance Co., Inc.</td>
<td>Inspector-Heating Ventilation and Air-Conditioning (“HVAC”) System</td>
<td>Non-MGM (“A”)</td>
<td>Settled</td>
<td>01/04/83</td>
<td>$500,000.00</td>
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<tr>
<td>4. Alarmco, Inc.</td>
<td>Contractor-Fire Alarm System</td>
<td>Non-MGM (“A”)</td>
<td>Settled</td>
<td>5/10/83</td>
<td>$300,000.00</td>
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<td>5. Albert Van Luit &amp; Co., Inc.</td>
<td>Supplier-Vinyl Wall Covering</td>
<td>Non-MGM (“A”)</td>
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<td>05/18/83</td>
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<td>No.</td>
<td>Party Description</td>
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<td>Settled Date</td>
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<tr>
<td>10.</td>
<td>Amfac Distribution Corp., d/b/a Amfac Electrical Supply Co., Inc.</td>
<td>Supplier - Electrical Conduit and Wire</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Not Settled</td>
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<td>12.</td>
<td>Bally Distributing Co.</td>
<td>Supplier - Plastics Gaming Products</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Settled</td>
<td>03/08/83</td>
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<td>13.</td>
<td>Bally Manufacturing Corp.</td>
<td>Manufacturer - Plastic Gaming</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Not Settled</td>
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</table>
Fighting Fire with Fire: Redefining the interior design value proposition

<table>
<thead>
<tr>
<th>Products</th>
</tr>
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<tbody>
<tr>
<td><strong>In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)</strong></td>
</tr>
<tr>
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<tr>
<td><strong>14. Barber-Coleman, Inc.</strong> Supplier-Room Non-MGM (&quot;A&quot;) Not Settled</td>
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<tr>
<td>Grilles for</td>
</tr>
<tr>
<td>HVAC System</td>
</tr>
<tr>
<td>****</td>
</tr>
<tr>
<td><strong>15. B &amp; M Air Balance</strong> Inspector-HVAC Non-MGM (&quot;A&quot;) Settled 05/23/83</td>
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<td>System</td>
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<tr>
<td>See Precisionaire, Inc.</td>
</tr>
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<td>****</td>
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<tr>
<td><strong>16. Cadillac Plastic and Chemical Company Supplier-Plastic Non-MGM (&quot;A&quot;) Not Settled</strong></td>
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<tr>
<td>Products</td>
</tr>
<tr>
<td>****</td>
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<tr>
<td><strong>17. California Electric Construction Co. Contractor-Non-MGM (&quot;A&quot;)</strong> 01/27/83 01/27/83</td>
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<tr>
<td>Electrical Wiring</td>
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<td>$10,000,000.00</td>
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<tr>
<td>****</td>
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<tr>
<td><strong>18. Clark County, subdivision of the State of Nevada Inspector-Fire Code Violations</strong></td>
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<td>Non-MGM (&quot;A&quot;) Settled 02/25/83</td>
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<td>$2,500,000.00</td>
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<tr>
<td><strong>19. Clark County Fire Equipment, Inc. Contractor-Alarm Non-MGM (&quot;A&quot;) Not Settled</strong></td>
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<tr>
<td>System</td>
</tr>
<tr>
<td>****</td>
</tr>
<tr>
<td><strong>20. Clark County Fire Protection District, subdivision of the State of Nevada Inspector-Fire Code Violations</strong></td>
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<tr>
<td>Non-MGM (&quot;A&quot;) Settled 02/25/83 See Clark County Protection District Code Violations</td>
</tr>
<tr>
<td>****</td>
</tr>
<tr>
<td><strong>21. Cohama, Inc. Supplier-Vinyl Non-MGM (&quot;A&quot;) Not Settled</strong> Products**</td>
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<tr>
<td>****</td>
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</tbody>
</table>

### Fighting Fire with Fire: Redefining the interior design value proposition

*In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)*

<table>
<thead>
<tr>
<th>#</th>
<th>Company</th>
<th>Product Type</th>
<th>Party Type</th>
<th>Details</th>
<th>Settled/Dismissal Date</th>
<th>Settlement Amount</th>
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<tbody>
<tr>
<td>22</td>
<td>Columbus Coated Fabric, Inc.</td>
<td>Supplier-Vinyl Fabric</td>
<td>Non-MGM (&quot;B&quot;)</td>
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<tr>
<td>23</td>
<td>Continental Mechanical Corp.</td>
<td>Contractor-HVAC System</td>
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<td>Settled 02/11/83</td>
<td>$10,250,000.00</td>
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<tr>
<td>24</td>
<td>Corona Plastic</td>
<td>Supplier-Plastic Products</td>
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<td>25</td>
<td>Corona Plastics</td>
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<tr>
<td>26</td>
<td>C. R. Laurence Co., Inc.</td>
<td>Supplier-Vinyl Wall Covering</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Not Settled</td>
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<tr>
<td>27</td>
<td>Crystals and Oils Decorators Supply Corporation</td>
<td>Supplier-Crystal Chandeliers and Light Fixtures</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Dismissal 06/23/83</td>
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<td>28</td>
<td>C. W. Stockwell, Inc.</td>
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<td>29</td>
<td>Dan Cashdan &amp; Associates</td>
<td>Engineer-Seismic Joint</td>
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<td>30</td>
<td>Dash Industries, Inc.</td>
<td>Supplier-Vinyl Wall Covering</td>
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<td>Settled 05/19/83</td>
<td>$75,000.00</td>
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</table>

### Appendix D

**Fighting Fire with Fire: Redefining the interior design value proposition**

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**In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)**

<table>
<thead>
<tr>
<th>#</th>
<th>Party Description</th>
<th>Relationship to Project</th>
<th>Defendant Type</th>
<th>Settlement Status</th>
<th>Settlement Details</th>
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<tbody>
<tr>
<td>31.</td>
<td>Del E. Webb Corp.</td>
<td>Contractor</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Not Settled</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Remodeling and New Addition</td>
<td></td>
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<tr>
<td>32.</td>
<td>Delta T</td>
<td>Inspector-HVAC System</td>
<td>Non-MGM (<em>A</em>)</td>
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<td>$60,000.00</td>
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<tr>
<td>✔</td>
<td>Don Schmitt</td>
<td>Interior Decorator</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Dismissal 06/23/83</td>
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<tr>
<td>✔</td>
<td>Dunn Edwards Corp.</td>
<td>Supplier-Vinyl Wall Covering</td>
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<tr>
<td>✔</td>
<td>Duo Flex Corp.</td>
<td>Contractor-Installed Casino Ceiling Tile</td>
<td>Non-MGM (<em>B</em>)</td>
<td>Not Settled</td>
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<td></td>
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<td>✔</td>
<td>Dynalectric Vegas Valley Co.</td>
<td>Contractor-Electrical Wiring</td>
<td>Non-MGM (<em>A</em>)</td>
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<td>E. I. DuPont de Nemours &amp; Co., Inc.</td>
<td>Supplier-Plastic Products</td>
<td>Non-MGM (<em>B</em>)</td>
<td>Not Settled</td>
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<tr>
<td>✔</td>
<td>Electrical Testing Laboratories</td>
<td>Inspector-Electrical Equipment</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Dismissal 06/23/83</td>
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<tr>
<td>✔</td>
<td>Elsters, Inc. d/b/a Lanco Supreme</td>
<td>Supplier-Fan Coil Units for HVAC System</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Dismissal 06/23/83</td>
<td></td>
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</tbody>
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In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)

<table>
<thead>
<tr>
<th>#</th>
<th>Company</th>
<th>Type</th>
<th>Source</th>
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<td>40</td>
<td>Essex Chemical Corp.</td>
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<td>Mastic for Casino Ceiling Tile</td>
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<td>41</td>
<td>Fabricon Products</td>
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<td>Non-MGM (“A”)</td>
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<td>42</td>
<td>Fairfax Electronics, Inc.</td>
<td>Contractor-Fire Alarm System</td>
<td>Non-MGM (“A”)</td>
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<td>43</td>
<td>Familian Corp.</td>
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<td></td>
<td>Plumbing Pipe</td>
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<td>44</td>
<td>Fred Benninger</td>
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<td>01/03/83 See MGM</td>
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<td>45</td>
<td>Frigitemp Corp., successor in interest to Samson Products</td>
<td>Supplier-Foam in interest to Samson Products</td>
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<td>46</td>
<td>General Felt Products of California, Inc.</td>
<td>Supplier-Animal Hair Carpet Pads</td>
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<td>47</td>
<td>General Tire &amp; Rubber Company</td>
<td>Supplier-Vinyl Wall Covering</td>
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<td>48</td>
<td>Governair</td>
<td>Supplier-Controls</td>
<td>Non-MGM (“A”)</td>
<td>Settled</td>
<td>02/10/83 See Temtrol, Inc.</td>
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</table>
Fighting Fire with Fire:
Redefining the interior design value proposition

In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)

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<tr>
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<tr>
<td>49.</td>
<td>Grand Reservation Service, Inc.</td>
<td>Owner and Operator</td>
<td>MGM</td>
<td>Settled</td>
</tr>
<tr>
<td>50.</td>
<td>Grand Resorts, Inc.</td>
<td>Owner and Operator</td>
<td>MGM</td>
<td>Settled</td>
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<tr>
<td>51.</td>
<td>Graybar Electric Supply, Inc.</td>
<td>Supplier-Aluminum Conduit and Plastic Coated Wiring</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Partial</td>
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<tr>
<td>52.</td>
<td>Heitman and Associates formerly L. H. Antoine and Associates</td>
<td>Engineer-Curtainwall</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Dismissal</td>
</tr>
<tr>
<td>53.</td>
<td>H. J. Lohrman and Associates</td>
<td>Engineer-Mechanical Design</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Dismissal</td>
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<tr>
<td>54.</td>
<td>Imperial Glass Co.</td>
<td>Contractor-Curtainwall</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Dismissal</td>
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<tr>
<td>✔ 55.</td>
<td>J. Josephson, Inc.</td>
<td>Supplier-Vinyl Wall Covering</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Not Settled</td>
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<tr>
<td>✔ 56.</td>
<td>Joel Bergman</td>
<td>Architect</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Settled</td>
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<tr>
<td></td>
<td>Johnson Controls, Inc.</td>
<td>Contractor-HVAC</td>
<td>Non-MGM (<em>A</em>)</td>
<td>Not Settled</td>
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</table>
### Fighting Fire with Fire:
### Redefining the interior design value proposition

**In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)**

<table>
<thead>
<tr>
<th>Company/Party</th>
<th>Role</th>
<th>Value Proposition</th>
<th>Status</th>
<th>Settled/Dismissed Date</th>
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</thead>
<tbody>
<tr>
<td>Kemper Corp, a subsidiary of Lumbermens Mutual Casualty Co.</td>
<td>Inspector-Fire</td>
<td>Kemper Property Insurance</td>
<td>Settled</td>
<td>12/29/82</td>
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<tr>
<td>Kerona, Inc.</td>
<td>Manufacturer-Piping</td>
<td>Non-MGM (“B”) Plastic Plumbing Pipe</td>
<td>Not Settled</td>
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<tr>
<td>Kerona Plastic Extrusion Company, Inc.</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Kirk Kirkorian</td>
<td>Owner and Operator</td>
<td>MGM</td>
<td>Settled</td>
<td>01/03/83</td>
</tr>
<tr>
<td>Lawless Brothers, Inc., d/b/a Lawless Detroit Diesel Generator</td>
<td>Supplier-Auxiliary Generator</td>
<td>Non-MGM (“A”)</td>
<td>Dismissal</td>
<td>06/23/83</td>
</tr>
<tr>
<td>Lear Siegler, Inc, d/b/a Lear Rink Division for HVAC System</td>
<td>Supplier-Duct Work</td>
<td>Non-MGM (“A”)</td>
<td>Not Settled</td>
<td></td>
</tr>
<tr>
<td>Lumbermens Mutual Casualty Co., d/b/a Kemper Group, Kemper Insurance Group, Kemper Insurance and Kemper</td>
<td>Inspector-Fire</td>
<td>Kemper Property Insurance</td>
<td>Settled</td>
<td>12/29/82</td>
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</tbody>
</table>
Fighting Fire with Fire: 
Redefining the interior design value proposition

In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)

<table>
<thead>
<tr>
<th>Insurance Companies</th>
</tr>
</thead>
<tbody>
<tr>
<td>65.3 M Company Supplier-Foam Products</td>
</tr>
<tr>
<td>66. Martin Stern, Jr. Architect Non-MGM (“A”) Settled 01/11/83 $1,400,000.00</td>
</tr>
<tr>
<td>67. Martin Stern, Jr., d/b/a A.I.A. Architects and Associates</td>
</tr>
<tr>
<td>69. Master Protection Contractor-Alarm Systems Non-MGM (“A”) Not Settled</td>
</tr>
<tr>
<td>70. Metro-Goldwyn-Mayer, Inc. Owner and Operator MGM of Hotel Settled 01/03/83 $75,000,000.00</td>
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<tr>
<td>71. MGM Grand Hotel, Inc.</td>
</tr>
<tr>
<td>72. MGM Grand Hotels, Inc.</td>
</tr>
<tr>
<td>73. MGM Grand Hotel-Las Vegas, Inc.</td>
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</table>
### Fighting Fire with Fire: Redefining the interior design value proposition

**In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)**

<table>
<thead>
<tr>
<th>#</th>
<th>Company</th>
<th>Type</th>
<th>Relationship</th>
<th>Status</th>
<th>Settled/Dismissed Date</th>
<th>Amount</th>
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<tbody>
<tr>
<td>74</td>
<td>Miles R. Nay, Inc.</td>
<td>Contractor-Plumbing</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Settled</td>
<td>01/25/83</td>
<td>$1,250,000.00</td>
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<tr>
<td>75</td>
<td>Nay Mechanical, Inc.</td>
<td>&quot;</td>
<td>&quot;</td>
<td>&quot;</td>
<td>&quot;</td>
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<tr>
<td>76</td>
<td>Nay Plumbing Co.</td>
<td>Contractor-Plumbing</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Dismissal</td>
<td>06/23/83</td>
<td></td>
</tr>
<tr>
<td>77</td>
<td>Nibco, Inc. successor in interest to or formerly known as Yardley Pipe</td>
<td>Supplier-Plastic</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Not Settled</td>
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<tr>
<td>78</td>
<td>Niederhauser Ornamental &amp; Metal Works Co., Inc.</td>
<td>Contractor-Sieismic</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Dismissal</td>
<td>06/23/83</td>
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<tr>
<td>79</td>
<td>Northrop Architectural Systems</td>
<td>Contractor-</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Settled</td>
<td>02/10/83</td>
<td>$500,000.00</td>
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<tr>
<td>80</td>
<td>N.W.S. Construction Corp., Inc.</td>
<td>Contracting-Venting for Elevators</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Settled</td>
<td>01/12/83</td>
<td>$450,000.00</td>
</tr>
<tr>
<td>81</td>
<td>N.W.S., Inc.</td>
<td>Contracting-Venting for Elevators</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Dismissal</td>
<td>06/23/83</td>
<td></td>
</tr>
<tr>
<td>82</td>
<td>Olson Glass Co., Inc.</td>
<td>Contractor-Plastic</td>
<td>Non-MGM (&quot;B&quot;)</td>
<td>Not Settled</td>
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<tr>
<td>83</td>
<td>Owens Corning Fiberglas</td>
<td>Supplier-Foam</td>
<td>Non-MGM (&quot;B&quot;)</td>
<td>Not Settled</td>
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### Appendix D

<table>
<thead>
<tr>
<th>Corp.</th>
<th>Insulation</th>
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<tr>
<td>-------</td>
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<tr>
<td>84. Orvin Engineering Co.</td>
<td>Contractor-Fire Sprinklers Non-MGM (“A”) Settled 03/07/83 $300,000.00</td>
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<tr>
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<tr>
<td>85. Otis Elevator Company</td>
<td>Contractor-Elevator System Non-MGM (“A”) Settled 03/08/83 $7,500,000.00</td>
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<tr>
<td>✔️ 86. Pari Craftsmen, Inc.</td>
<td>Contractor-Vinyl Wall Covering and Painting Non-MGM (“A”) Dismissal 06/23/83</td>
</tr>
<tr>
<td>-------</td>
<td>------------</td>
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<tr>
<td>87. Precisionaire, Inc., successor in interest to B &amp; M Air Balance</td>
<td>Inspector-HVAC System Non-MGM (“A”) Settled 06/23/83 $125,000.00</td>
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<tr>
<td>✔️ 89. QRS Neon Corporation</td>
<td>Supplier-Keno Board Non-MGM (“A”) Settled 05/17/83 $60,000.00</td>
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<td>-------</td>
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<tr>
<td>90. Ralph Anderson Company</td>
<td>Contractor- Installed Doors Non-MGM (“A”) Dismissal 06/23/83</td>
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<tr>
<td>✔️ 91. Ralph E. Phillips, Inc.</td>
<td>Design Services and Specifications Non-MGM (“A”) Settled 01/11/83 $60,000.00</td>
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<tr>
<td>92. Ram Products Company</td>
<td>Supplier-Plastic Non-MGM (“A”) Settled 03/07/83 $500,000.00</td>
</tr>
</tbody>
</table>
### Fighting Fire with Fire:
Redefining the interior design value proposition

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In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)

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#### Products

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<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>93. Richard A Hunter, d/b/a RAH Construction Co.</td>
<td>Contractor-Remodeling</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Settled</td>
</tr>
<tr>
<td>94. Richard S. Hatfield, Inc. d/b/a Norm's Refrigeration and Ice Equipment, d/b/a Norm's Refrigeration, Inc. Delicatessen</td>
<td>Contractor-Refrigeration</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Settled</td>
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<tr>
<td>95. Rink Division</td>
<td>Inspector-HVAC System</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Not Settled</td>
</tr>
<tr>
<td>96. Roberts Electric</td>
<td>Contractor-Electrical Systems</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Settled</td>
</tr>
<tr>
<td>97. Rohm and Haas</td>
<td>Supplier-Plastic Products</td>
<td>Non-MGM (&quot;B&quot;)</td>
<td>Not Settled</td>
</tr>
<tr>
<td>98. Samson West Corp.</td>
<td>Supplier-Foam Products</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Dismissal</td>
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<tr>
<td>99. Sav-Mor Upholstery Supply</td>
<td>Supplier-Vinyl Products</td>
<td>Non-MGM (&quot;B&quot;)</td>
<td>Not Settled</td>
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<tr>
<td>100. Schneider, Inc., formerly known as Schneider Sheet Metal, Inc.</td>
<td>Contractor-HVAC System</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>Not Settled</td>
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</tbody>
</table>
### Appendix D

#### In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)

<table>
<thead>
<tr>
<th>#</th>
<th>Company</th>
<th>Type</th>
<th>GM Status</th>
<th>Settle Date</th>
<th>Amount</th>
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<tbody>
<tr>
<td>101</td>
<td>Simpson Timber Co.</td>
<td>Supplier-Casino</td>
<td>Non-MGM (&quot;B&quot;)</td>
<td>04/28/83</td>
<td>$9,400,000.00</td>
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<td></td>
<td></td>
<td>Ceiling Tile</td>
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<tr>
<td>102</td>
<td>Southwest Air Conditioning, Inc.</td>
<td>Contractor-Sheet</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>01/12/83</td>
<td>$250,000.00</td>
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<td></td>
<td></td>
<td>Metal for HVAC System</td>
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<td>103</td>
<td>Standard Cabinet Works, Inc.</td>
<td>Contractor-Plastic</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>01/04/83</td>
<td>$500,000.00</td>
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<td></td>
<td></td>
<td>Products</td>
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<tr>
<td>104</td>
<td>Supreme Metal Fabricators</td>
<td>Contractor-Kitchen</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>06/23/83</td>
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<tr>
<td></td>
<td></td>
<td>Equipment</td>
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<td>105</td>
<td>Taylor Construction Company</td>
<td>General Contractor</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>01/15/83</td>
<td>$5,500,000.00</td>
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<td>106</td>
<td>Taylor International Corp.</td>
<td>“”</td>
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<td>107</td>
<td>Taylor of Nevada, Inc.</td>
<td>“”</td>
<td>“”</td>
<td>“”</td>
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<td>108</td>
<td>Temtrol, Inc.</td>
<td>Supplier-Controls</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>02/10/83</td>
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<td></td>
<td></td>
<td>for HVAC System</td>
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<td>109</td>
<td>Thorpe Insulation</td>
<td>Contractor-Insulation</td>
<td>Non-MGM (&quot;A&quot;)</td>
<td>03/08/83</td>
<td>$300,000.00</td>
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<tr>
<td></td>
<td></td>
<td>and Duct Work-HVAC System</td>
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**Fighting Fire with Fire:**
Redefining the interior design value proposition

In re MGM Grand Hotel Fire Litigation, 570 F.Supp. 913 (1983)

<table>
<thead>
<tr>
<th></th>
<th>Company Name</th>
<th>Type</th>
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<th>Settled Date</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>110</td>
<td>Tracinda Corporation</td>
<td>Owner and Operator</td>
<td>MGM</td>
<td>01/03/83</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>of Hotel</td>
<td></td>
<td></td>
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<tr>
<td>111</td>
<td>United States Elevator Corp.</td>
<td>Maintenance-Elevator System</td>
<td>Non-MGM (“A”)</td>
<td>Not Settled</td>
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<td>112</td>
<td>United Technologies Corp.</td>
<td>Contractor-Elevator System</td>
<td>Non-MGM (“A”)</td>
<td>03/08/83</td>
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<tr>
<td>113</td>
<td>Wall-Pride, Inc.</td>
<td>Supplier-Vinyl Wall</td>
<td>Non-MGM (“A”)</td>
<td>05/11/83</td>
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<td></td>
<td></td>
<td>Covering</td>
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<td>114</td>
<td>W.A. Perry Tile and Marble Co.</td>
<td>Contractor-Ceramic Tile and Mastic</td>
<td>Non-MGM (“A”)</td>
<td>01/04/83</td>
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<td>115</td>
<td>Winfield Design Associates, Inc.</td>
<td>Supplier-Vinyl Wall Covering</td>
<td>Non-MGM (“A”)</td>
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<tr>
<td>116</td>
<td>W.J. Thompson, Inc.</td>
<td>Contractor-Plaster, Drywall and Fireproofing</td>
<td>Non-MGM (“A”)</td>
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<td>$2,725,000.00</td>
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<tr>
<td>117</td>
<td>Wilkinson Company, Inc. d/b/a Wilkinson Chutes, Inc.</td>
<td>Contractor-Laundry Chutes</td>
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<td>118</td>
<td>Yardley Pipe</td>
<td>Supplier-Plastic Pipe</td>
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