

# **BACKGROUND PAPER FOR The California Council for Interior Design Certification**

**Joint Sunset Review Oversight Hearing, March 24, 2026  
Assembly Committee on Business and Professions and the  
Senate Committee on Business, Professions, and Economic Development**

## **IDENTIFIED ISSUES, BACKGROUND, AND RECOMMENDATIONS**

### **BRIEF OVERVIEW OF THE CALIFORNIA COUNCIL FOR INTERIOR DESIGN CERTIFICATION**

The California Council for Interior Design Certification (CCIDC) was first established in 1992. Unlike the majority of regulatory bodies responsible for overseeing professions and vocations in California, CCIDC is not a state agency and does not function as part of the state’s government. Instead, CCIDC is incorporated as a private nonprofit public benefit corporation with 501(c)(3) tax exempt status. Certification offered by CCIDC is voluntary at the state level, though statute allows only certified individuals to use the term “certified interior designer” or any other language that implies certification by the Council.

As of December 2025, there are 1,722 certified interior designers (CIDs) in California. A CID is defined in statute as “a person who prepares and submits nonstructural or nonseismic plans ... to local building departments that are of sufficient complexity so as to require the skills of a licensed contractor to implement them, and who engages in programming, planning, designing, and documenting the construction and installation of nonstructural or nonseismic elements, finishes and furnishings within the interior spaces of a building, and has demonstrated by means of education, experience and examination, the competency to protect and enhance the health, safety, and welfare of the public.”<sup>1</sup> The Council is authorized to issue a commercial designation to CIDs who have passed additional interior design courses and examinations.<sup>2</sup>

While the phrase “interior design” is commonly associated with decorative services focused exclusively on visual elements such as furniture arrangements or wall colors, CIDs utilize considerable technical knowledge to ensure that indoor spaces are safe and functional in addition to aesthetically pleasing. CIDs are frequently involved in designing nonstructural interior elements and preparing code-compliant interior plans and documents and often work with building codes, accessibility standards, and contractors. CCIDC attributes public misconceptions regarding the scope of the interior design profession to the rise in popularity of design-oriented reality television, arguing that media portrayals “oversimplify and misrepresent the complexity and technical expertise required in professional practice.”

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<sup>1</sup> Bus. & Prof. Code, § 5800

<sup>2</sup> Bus. & Prof. Code, § 5811.1

CCIDC has the authority to grant or deny applications for certification and to discipline certificate holders by denying, suspending, or imposing probationary conditions on certificates. CCIDC may also require a CID to complete remedial coursework in ethics and business practices as a condition of reinstatement or resolution of a disciplinary action. Through these responsibilities, CCIDC helps ensure that CIDs meet professional competency standards designed to protect California consumers. CCIDC does not approve or oversee educational institutions offering programs in interior design.

## **History of Interior Design Regulation in California**

While interior designers have never been formally licensed in California, the profession's scope of work has historically overlapped with services provided by other professionals regulated by licensing entities within the Department of Consumer Affairs (DCA), including engineers, contractors, and architects. The California Architects Board (CAB), first established in 1901, oversees professionals engaged in "the planning of sites, and the design, in whole or in part, of buildings, or groups of buildings and structures."<sup>3</sup> The Board for Professional Engineers, Land Surveyors, and Geologists (BPELSG) has licensed professional engineers since 1929, whose scope of practice includes "consultation, investigation, evaluation, planning or design of public or private utilities, structures, machines, processes, circuits, buildings, equipment or projects, and supervision of construction for the purpose of securing compliance with specifications and design for any such work."<sup>4</sup> Services provided by interior designers are also similar in nature to those within the scope of licensees of the Contractors State License Board (CSLB).

During the 1980s, the design and construction industry was becoming increasingly specialized, with a distinct field of interior design emerging out of the more traditional disciplines of architecture and engineering while incorporating aspects of those state-licensed practices. This overlap in scope of practice created legal, business, and marketing problems for interior designers and their clients, resulting in a dilemma for CAB and other state regulators and local building officials, who recognized both the similarities and differences between traditional architecture and interior design. Early efforts to regulate interior designers as a distinct profession commenced during this time, beginning in 1983 with Senate Bill (SB) 530 (Rosenthal), which originally proposed to classify interior designers as home improvement contractors under CSLB and then proposed to establish a State Board of Examiners of Interior Designers within the DCA to provide interior designers with title protection. SB 1502 (Dills) was next introduced in 1984 to establish title protection for interior designers under an advisory board within what is now the Bureau of Household Goods and Services (BHGS); this bill also failed passage in committee.

In 1985, the Legislature enacted SB 790 (Seymour), which revised statutory exemptions to the Architectural Practices Act, in conformity with exemptions to the Professional Engineering Act, to clarify the practice of architecture to allow for unlicensed individual to engage in interior design work to the extent that the work would not affect the safety of any building or its occupants, including structural and seismic considerations.<sup>5</sup> However, local officials remained increasingly reluctant to approve any plans that did not bear the stamp of a state-licensed architect or engineer. According to a survey conducted by CAB, a majority of the state's 409 local building jurisdictions accepted plans from unlicensed individuals, but many local building officials reportedly interpreted the unclear terms in SB 790 to mean that only licensed professionals could submit plans for building interiors involving any safety considerations, with some interior designers testifying that interior designers had been precluded from submitting plans in approximately 80 local jurisdictions statewide.

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<sup>3</sup> Bus. & Prof. Code, § 5500.1

<sup>4</sup> Bus. & Prof. Code, § 6701

<sup>5</sup> Chapter 1327, Statutes of 1985.

In response to this persistent ambiguity, the Legislature enacted SB 354 (Craven) in 1988, an urgency bill which required CSLB to fund a study on the necessity and feasibility of licensing interior designers.<sup>6</sup> SB 354 was sponsored by the California Legislative Conference on Interior Design (CLCID), an organization that was formed to advocate for the interior design profession. SB 354 required a report to be submitted to the Legislature by February 15 of the following year, including findings relating to how the practice of interior design affects the health, safety, and welfare of the public.<sup>7</sup>

The feasibility study, prepared by the California State University – Real Estate & Land Use Institute under an interagency agreement, analyzed data collected through interviews with approximately 100 interior designers, architects, engineers, building officials, and other stakeholders. The report's first finding was that "the interior design profession consists of two groups of professionals performing tasks that can be defined as different for each group," with tasks primarily associated with interior *decorators* involving only minor public health, safety, or welfare concerns while those tasks associated with interior *designers* involving those concerns more significantly. The study recommended that interior decorators be registered by the BHGS. In reference to interior designers, the study concluded:

The results of this research indicate that both groups of interior design professionals defined by this study should be regulated. However, licensing is recommended for interior designers only. Insofar as possible, the licensing procedure should follow the criteria for membership of many of the interior design associations. ... The preferred recommendation is that a design state license board consisting of architects, engineers, land surveyors, landscape architects, interior designers, and other design professionals replace the present individual boards. The composition of the board would be proportionate to the number of professionals currently licensed.

The study recommended against including CSLB in the proposed multidisciplinary design board. The study also discussed the possibility of licensing interior designers through CAB. However, it argued that "although this would be a rational approach in that the interior designers would be licensed with other design professionals, the two professions would have to resolve jurisdictional problems that they have not been able to solve in the past."<sup>8</sup>

SB 153 (Craven) was introduced in 1989 to effectuate the feasibility study's recommendations. Sponsored by CLCID, the bill initially proposed to include interior design in the definition of a specialty contractor license under CSLB. On November 14, 1989, the Senate Committee on Business and Professions held an interim hearing on the bill, with testimony from various stakeholders. During the hearing, Senator Joseph B. Montoya, the committee chair, acknowledged that the committee had recently "received a set of three amendments, each of which approaches the regulation of interior designers through a different board." The first set proposed to have CSLB issue certificates of exemption to eligible interior designers; the second set proposed to register interior designers under a committee within CAB; and the third set proposed to establish a registration unit for interior designers within the DCA. The interim hearing report discussed the deficiencies of each model and recognized "the natural tendency of this administration is to be against creation of any new boards or commissions or expansion thereof."<sup>9</sup>

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<sup>6</sup> Chapter 699, Statutes of 1988.

<sup>7</sup> "Governor Signs Bill That May Lead to Interior Design Licenses." *Los Angeles Times*, 18 Sept. 1988.

<sup>8</sup> Place, D. M., Guenther G. Kress, and Charles F. Hohm. *A Study to Determine the Need to License Interior Designers*. California State University – Real Estate & Land Use Institute, 1989.

<sup>9</sup> Cal. Sen. Bus. & Prof. Comm., *Interim Hearing on SB 153 (Craven): Interior Designers*. California Legislature, 14 Nov. 1989.

Shortly after the Legislature reconvened in 1990, SB 153 was amended to provide for a voluntary certification program through a private interior design organization, with statutory protection of terms or titles indicating certification. While less comprehensive than a “Practice Act” administered by a state board, the bill’s “Title Act” framework—purportedly modeled after the dieticians’ statute under what was then the Department of Health Services—was identified as politically acceptable to Governor George Deukmejian, who signed the bill on July 20, 1990.<sup>10</sup> CLCID and other stakeholders were optimistic that the legislation would result in interior designers again being allowed to submit plans to local building departments.<sup>11</sup>

SB 153 went into effect on January 1, 1991, and CLCID appointed a multidisciplinary task force of interior designers to plan the implementation of the bill’s certification program. CCIDC was subsequently established in January 1992 as a nonprofit mutual benefit corporation, and the Council’s first board of directors approved bylaws to define classes of certification, govern appointment of new directors, and specify the roles and responsibilities of the Council and its staff. The board of directors also adopted administrative rules and regulations to govern the application for certification, issuance of certification, and discipline of CIDs. SB 1028 (Marks) was enacted in 1995 to clarify that the statutory definition of “interior design organization” referred to CCIDC’s structure as a nonprofit professional organization of CIDs whose governing board included representatives of the public.<sup>12</sup>

When the sunset review process was first established in statute by SB 2036 (McCorquodale) in 1994, CCIDC was subjected to an inoperability date of July 1, 1996, and a repeal date of July 1, 1997.<sup>13</sup> In 1995, SB 1027 (Marks) was introduced to extend CCIDC’s sunset timeline by an additional year. However, the bill was vetoed by Governor Pete Wilson, who wrote that the existing dates provided “ample time for examination of the strengths and weaknesses of the existing statutory and regulatory framework.”

The Joint Legislative Sunset Review Committee (Joint Committee), chaired by Senator Ruben S. Ayala, published its review and evaluation of CCIDC in February 1996. The committee report discussed 14 serious concerns regarding the Council and its operations, and the committee ultimately recommended that the interior design certification program be allowed to sunset the following year. The Joint Committee background paper questioned the need for what it described as a “state-sanctioned cartel” to carry out a certification program that any private association could do sufficiently without legislation and scrutinized whether certification was a necessary or appropriate solution to issues with plan acceptance by local officials.<sup>14</sup>

Among other issues raised in the Joint Committee’s background paper was the “great potential for confusion and/or misrepresentation by interior designers who use the certification terminology when advertising their services,” with some CIDs referring to themselves as “state certified” in a way that implied that a state agency, rather than a private nonprofit corporation, had validated their credentials. The background paper further raised concerns about CCIDC’s limited enforcement capability, low exam passage rates for first-time candidates, and a lack of evidence that certification was needed or demanded by the public, among other issues. In the conclusion of its report, the Joint Committee stated:

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<sup>10</sup> Chapter 396, Statutes of 1990.

<sup>11</sup> “Bill Recognizing Designers is OKd.” *Los Angeles Times*, 12 Aug. 1990.

<sup>12</sup> Chapter 891, Statutes of 1995.

<sup>13</sup> Chapter 908, Statutes of 1994.

<sup>14</sup> Joint Legislative Sunset Review Committee. *Findings and Recommendations: Review and Evaluation of the Interior Design Certification Program; Report to the Department of Consumer Affairs*. California Legislature, Feb. 1996.

In summary, there are general concerns that CCIDC, as a monopolistic private entity, can require membership for purposes of certification, can charge whatever it chooses for certification, and can adopt onerous or discriminatory membership and/or certification criteria. While CCIDC's present program appears to be an exemplary private certification program, there is a concern regarding the future accountability of such programs and organizations.

The provisions of law enacted through SB 153 were allowed to become inoperative on July 1, 1997, consistent with the Joint Committee's recommendation that CCIDC be sunset. However, on August 26, 1997, the Legislature passed an urgency bill, SB 435 (McPherson), which reconstituted the interior design certification program by repealing its inoperative date from statute and extending the repeal date until January 1, 1999. The Governor signed this bill despite opposition from the DCA, which had argued that "there is no new evidence that the unregulated practice of interior design would endanger the health, safety or welfare of the public."<sup>15</sup>

The following year in 1998, the Legislature enacted SB 1471 (McPherson), which extended CCIDC's sunset by an additional three years, with a new repeal date of January 1, 2002.<sup>16</sup> As with each prior legislative effort to extend the state's interior design certification laws, SB 1471 was co-sponsored by CCIDC and CLCID, who argued that "private certification rather than government regulation is endorsed by the Governor's administration and others as a way to balance quality assurance and consumer protection with minimal government intrusion in the marketplace." SB 1471 initially included language to further delineate the composition of CCIDC's governing board and statutorily mandate specified reports to the Legislature, but this language was removed from the bill following discussions with the DCA and other stakeholders as unnecessary, but CCIDC pledged to take those actions voluntarily.

While CCIDC's interior design certification program had been reconstituted and extended by the Legislature, another challenge soon arose for the profession. Previously, three distinct building codes were utilized by different regions of the United States, but it was announced that those codes would be combined into a unified International Building Code beginning in 2000. Early drafts of this consolidated code, referred to as IBC 2000, included language that stakeholders interpreted to preclude design professionals who were not registered by a state government agency from submitting plans to local building officials. Specifically, language in the final draft contained references to "registered design professionals," which was believed to be inconsistent with voluntary certification from a private entity.

In response to apprehension about the impact of the new IBC 2000 requirements, CCIDC itself sponsored Assembly Bill (AB) 1096 (Romero), which was introduced in 1999 to replace the existing certification program with a registration program under a new Board of Interior Design within the DCA. While CCIDC and CLCID supported the bill as necessary to ensure compliance with IBC 2000, the bill was opposed by both CAB and BPELSG and their associated professional associations, along with the DCA, who argued that the bill was ambiguously drafted to resemble a Practice Act rather than a Title Act and that IBC 2000 was not necessarily more restrictive than the prior codes. The Assembly policy committee suggested that the sponsor "seek an opinion from Legislative Counsel or the Attorney General, to determine the extent to which this language constitutes an absolute mandate for state registration of interior designers."

While AB 1096 was passed by the Legislature, the bill was vetoed by Governor Gray Davis, who wrote:

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<sup>15</sup> Chapter 351, Statutes of 1997.

<sup>16</sup> Chapter 261, Statutes of 1998.

This bill creates a new regulatory program for an industry where there is no demonstrated consumer harm. The creation of a new regulatory program and a new state agency at a time when the Legislature is eliminating licensing boards and streamlining regulatory programs is inappropriate. Additionally, this bill does not provide for adequate start-up funding and is unclear as to what, if any, consumer protection would be served. Government intervention in a marketplace should be reserved for cases where there is consumer harm.

Not long after the Governor's veto, the Legislative Counsel of California delivered a formal opinion at the request of Senator McPherson as to whether the proposed IBC 2000 requirements would prohibit local building officials from accepting interior design plans from CIDs who were not registered design professionals. The opinion of the Legislative Counsel was that IBC 2000 did *not* prohibit local building officials from accepting interior design plans from unregistered CIDs, because IBC 2000 only required plans to be prepared by registered design professionals when required by state law. Because California did not license or regulate interior designers and allowed CIDs to submit plans to local building officials, the opinion concluded that IBC 2000 would not create any new prohibitions or barriers.<sup>17</sup>

CCIDC underwent its second sunset review in 2001, with the Joint Committee holding hearings in December 2000. In its discussion of current issues related to CCIDC, the Joint Committee argued that "it is unclear whether this non-profit professional organization, sanctioned in law by the state, is operating purely as a certifying body or is involved in activities more appropriate for a professional membership trade association." The background paper posed several existential questions to CCIDC as to what they believed their role was in the oversight of interior designers and whether it was appropriate for CLCID to be part of the certification process. The Joint Committee also raised concerns that some CIDs were misrepresenting themselves as "state certified" and that CCIDC's public information materials were potentially misleading in regard to the function the state played in certification.

Ultimately, the Joint Committee recommended only a two-year sunset extension for CCIDC. SB 136 (Figueroa) was subsequently introduced as a sunset omnibus bill dealing with multiple entities undergoing review that year. The bill extended CCIDC's sunset date until January 1, 2004, while requiring it to report specified information to the Joint Committee by September 2002 and to undergo an independent audit of its finances. The bill also required CCIDC to change from a 501(c)(6) nonprofit corporation to a 501(c)(3) nonprofit corporation, which was part of an effort by the Joint Committee to ensure that CCIDC's mission was to serve the public rather than the business interests of CIDs.<sup>18</sup>

CCIDC submitted a copy of its independent audit to the Joint Committee in August 2002 and submitted its full sunset report in October 2002. The Joint Committee published a background paper in conjunction with its sunset review of CCIDC in Spring 2003, at which time CCIDC was still in the midst of transitioning its nonprofit status. The Joint Committee raised several issues about CCIDC's operations, including questions about the effectiveness of CCIDC's outreach efforts to law enforcement, interior design schools, building officials, and the public. However, the Joint Committee recommended that CCIDC's certification program be continued, concluding that "the certified interior designer law can provide helpful guidance to consumers selecting interior designers in California." SB 363 (Figueroa) was subsequently enacted in 2003, which extended CCIDC's sunset until January 1, 2006, modified the qualifying education and experience standards for a CID, and required CCIDC to provide a report on the costs and benefits of its examination requirements and feasible alternatives.<sup>19</sup>

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<sup>17</sup> California Legislative Counsel. *Certified Interior Designer*. Opinion no. 6147, 21 Sept. 2000.

<sup>18</sup> Chapter 495, Statutes of 2001.

<sup>19</sup> Chapter 874, Statutes of 2003.

While CCIDC was intended to undergo sunset review again in 2005, Governor Arnold Schwarzenegger's California Performance Review (CPR), a far-reaching initiative to restructure state government to eliminate bureaucracy, resulted in the Joint Committee deferring multiple sunset reviews in anticipation of CPR recommendations. SB 1549 (Figueroa) was enacted in 2004, which extended multiple sunset reviews, including CCIDC's to January 1, 2007.<sup>20</sup> The Joint Committee then endured what was described as a spike in its workload, resulting in the introduction of SB 232 (Figueroa) in 2005 to again push out various sunset reviews, including another extension for CCIDC.

Dramatically, SB 232 was opposed by Governor Schwarzenegger, who had pledged to "blow up boxes" through his Governor's Reorganization Plan (GRP) #1, which proposed to eliminate numerous regulatory boards under the DCA and replace them with bureaus.<sup>21</sup> Committee analysis referred to the Administration's opposition as "an unprecedented breach of the past collaborative and bipartisan manner in which the Executive and Legislative branches of California government have conducted the sunset review process for well over a decade." Governor Schwarzenegger ultimately abandoned the proposed GRP #1, and SB 232 was signed into law, extending CCIDC's sunset to January 1, 2008.<sup>22</sup> A subsequent bill, SB 1476, was then signed into law the following year, which further pushed CCIDC's sunset out to January 1, 2010.<sup>23</sup>

In 2008, SB 1312 (Yee/Calderon) was introduced as a new effort to reassign responsibility for overseeing interior designers from CCIDC to a state agency. Initially, the bill proposed to repeal and replace CAB with a new California Architects and Registered Interior Designers Board within the DCA, whose professional membership would include both licensed architects and registered interior designers. The bill was sponsored by the Interior Design Coalition of California (IDCC) and supported by several national interior design associations, but was opposed by CLCID, CAB, and the American Institute of Architects, revealing a schism within the design profession regarding its future.

While the sponsor of SB 1312 argued that state oversight of interior designers was insufficient and that IBC 2000 was still likely to disrupt the interior design profession, the Senate Committee on Business, Professions, and Economic Development was skeptical of the purported consumer harm risk raised in the sponsor's sunrise questionnaire and raised concerns about the membership composition of the new board and the potential consequences of imposing new requirements on all practicing interior designers. After the bill passed its policy committee hearing with a recognition that the measure was a "work in progress," it was amended to place interior designers under a new Registered Interior Designers Committee within the existing CAB. The amended bill remained opposed by CLCID and ultimately failed to pass off the Senate Floor. The following year, CCIDC's sunset date was again extended until January 1, 2013.<sup>24</sup>

In 2012, AB 2482 (Ma) was introduced to establish a new California Registered Interior Designers Board within the DCA to license and regulate registered interior designers. While the bill would have established a new licensure category under a state board, later amendments to the bill declared an intent to merely "permit an additional career path" for some interior designers "by providing the opportunity for licensure for those who so choose." The language further declared that "it is not the intent of the Legislature to affect the existing practice of interior design in any way."

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<sup>20</sup> Chapter 691, Statutes of 2004.

<sup>21</sup> Legislative Analyst's Office. *Assessing the Governor's Reorganization Proposals*. February 2005.

<sup>22</sup> Chapter 675, Statutes of 2005.

<sup>23</sup> Chapter 658, Statutes of 2006.

<sup>24</sup> Chapter 270, Statutes of 2009.

One of the central arguments in support of AB 2482 was that California’s status as a national outlier in its oversight of interior designers was impairing the profession. Of the 28 states that were believed at the time to provide for some form of regulation of interior design, only California relied on a private organization rather than a state agency. Supporters of the bill also pointed out that while other states required applicants to pass the National Council for Interior Design Qualification (NCIDQ), California had recently transitioned to exclusively requiring all applicants to pass the Interior Design Examination (IDEX<sup>25</sup>) California, an examination developed by CCIDC that was recognized by no other state or the federal government, resulting in barriers to reciprocity and portability. Supporters of the bill also continued to blame the state’s private certification scheme for the inconsistent acceptance of plans submitted by CIDs to local building departments.

Despite these arguments, the Assembly policy committee analysis was critical of the bill:

Similar to the other boards and bureaus under DCA, as drafted, the Board would recognize the public’s health, safety and welfare as paramount to its duties. Despite this laudable intent, it is unclear whether the lack of this regulatory board and licensing program therein would constitute tangible harm to the public. It is also unclear if local permitting concerns can be resolved without establishing an entirely new regulatory body.

The analysis further noted that details regarding the construction of the new board membership composition remained blank, which the committee described as “problematic.” While AB 2482 was supported by the American Society of Interior Designers and other stakeholders, the proposal for licensure was again opposed by CLCID, CAB, and the American Institute of Architects, in addition to the Community College League, who raised concerns about the potential impact on the state’s community college career and workforce preparation and training programs. AB 2482 died without receiving a policy committee hearing in the Assembly.

CCIDC underwent a comprehensive sunset review in 2013, at which point the Joint Committee had been dissolved and its work assumed by the respective Senate and Assembly policy committees. The sunset background paper acknowledged recent efforts to establish a licensure program for interior designers within a state board, but the Committees ultimately concluded that “as a private certifying organization, the CCIDC serves a valuable benefit to the public, in certifying interior designers in California and should be continued and reviewed again by the appropriate policy committees of the Legislature in four years.” SB 308 (Lieu) extended CCIDC’s sunset date until January 1, 2018, and effectuated additional recommendations made during the sunset process, including requiring CIDs to use written contracts when providing interior design services and requiring meetings of CCIDC’s board to comply with the Bagley-Keene Open Meeting Act. The bill additionally included a clarifying declaration affirming the voluntary nature of certification.<sup>26</sup>

There were no further legislative efforts to reform the state’s regulation of interior designers prior to CCIDC’s next sunset review in 2017. The sunset background paper raised several issues about CCIDC and its operations, while recommending that CCIDC’s sunset be extended by another four years. One new issue that received substantial discussion was whether a new certification category should be created for commercial interior designers. The sunset background paper noted that an October 2016 report on occupational licensing reform released by the Little Hoover Commission supported this proposal, stating:

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<sup>25</sup> IDEX is a registered trademark of CCIDC.

<sup>26</sup> Chapter 333, Statutes of 2013.

Commercial interior designers, for example often do building code-impacted design work – moving walls that entail electrical, lighting, HVAC and other changes. They design the layout of prisons, where the safety of correctional officers and inmates is on the line. Even though the people performing this commercial work typically have extensive educational and work experience, city and county inspectors do not recognize their unlicensed voluntary credentials. Architects or engineers must sign off on their plans, resulting in time and cost delays.<sup>27</sup>

AB 426 (Ridley-Thomas) was introduced in early 2017 to extend CCIDC’s sunset date by three years; while the bill was sponsored by the American Society for Interior Designers, it was not an official sunset bill, and it did not receive a policy committee hearing the Assembly. SB 547 (Hill), the official sunset bill for CCIDC as well as several other entities undergoing review, was then passed by the Legislature to simply extend CCIDC’s sunset date until January 1, 2022, without any additional reforms.<sup>28</sup> The Legislature’s sunset review of CCIDC was then extended by an additional year through SB 1474 (Committee on Business, Professions, and Economic Development) due to the COVID-19 pandemic.<sup>29</sup>

The next, and most recent, sunset review of CCIDC took place in 2022. During the intervening period, the CCIDC board had elected to proactively establish an optional commercial designation for CIDs. The Committees’ background paper proposed codifying the authority for CCIDC to establish a commercial designation but noted disagreement among CCIDC and commercial interior designers as to what the minimum qualifications should be to obtain that designation, with the industry professionals advocating for more stringent education, training, and examination requirements. This issue was not resolved in time to be included in CCIDC’s sunset bill, SB 1437 (Roth), which was enacted to simply extend CCIDC’s sunset date until January 1, 2027, and delete an obsolete reporting requirement.<sup>30</sup> However, language codifying the commercial designation was enacted the following year through SB 816 (Roth), along with other reforms made in response to issues discussion during CCIDC’s earlier sunset review.<sup>31</sup>

As CCIDC undergoes the sunset review process once again, numerous issues raised over the decades remain subject to actionable discussion by the Legislature. First and arguably foremost among these issues is that of stamp acceptance, the same issue that SB 153 sought to address when it created CCIDC over 35 years ago. While CCIDC has implemented the commercial designation, many CIDs continue to state that they face challenges when submitting plans to local building officials, with major jurisdictions purportedly denying CIDs access to the permitting process. These challenges have led to ongoing efforts by some within the interior design profession to seek legislation to place interior designers within the purview of a state board, with stakeholders engaged in a substantially similar debate to the one that took place during prior legislative discussions over the years.

Additionally, the Committees have recently questioned whether it is generally appropriate for a private entity to administer what amounts to a substitute for a state program. Recent sunset reviews criticized similar councils for lacking the transparency, accountability, and due process required of government agencies. While CCIDC may not present similar issues, there should nevertheless be a meaningful discussion of whether private certification remains a preferred solution over traditional state oversight.

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<sup>27</sup> Little Hoover Commission. *Jobs for Californians: Strategies to Ease Occupational Licensing Barriers*. Report No. 234, October 2016.

<sup>28</sup> Chapter 429, Statutes of 2017.

<sup>29</sup> Chapter 312, Statutes of 2020.

<sup>30</sup> Chapter 311, Statutes of 2022.

<sup>31</sup> Chapter 723, Statutes of 2023.

## **Mission Statement**

CCIDC has adopted the following mission statement:

*“To establish and implement professional standards and educational requirements, educate the public, and facilitate interior design professionals’ compliance with our standards and code of ethics in order to provide for the protection, health, safety and welfare of the public by administering the Certified Interior Designers Title Act.”*

## **Board of Directors Composition**

The Certified Interior Designers Title Act requires CCIDC to be incorporated as a 501(c)(3) nonprofit organization consisting of CIDs. Statute does not place specific requirements on the composition of CCIDC’s governing board but provides that the board must include representatives of the public. According to CCIDC, its professional board members were historically selected as representatives from various interior design membership organizations; however, several of those organizations either disbanded or experienced a decline in California-based membership, making it increasingly difficult to fill open seats. Further, CCIDC states that it came to believe those organizations no longer reflected the diversity or breadth of the interior design profession in California, and that many individual interior designers, including those operating small businesses or working independently, were not affiliated with such groups and remained underrepresented in the governance of the profession.

In 2024, the CCIDC Board of Directors amended its bylaws to restructure the composition of its professional board member roles. CCIDC states that this decision was made to ensure that its board accurately and equitably represents the full scope of the interior design profession in California. Professional board members are now selected based on their expertise in distinct areas of interior design practice, rather than organizational affiliation. Under the revised structure, board members represent a range of design disciplines including residential, commercial, specialty practice areas, sustainable design, multi-disciplinary practice, and interior design education. CCIDC believes that this inclusive and discipline-based structure ensures that all segments of the profession regardless of firm size, affiliation, or specialty have a voice in the governance and oversight of the certification process.

Per CCIDC’s most recent bylaws, the Board of Directors is comprised of up to 11 authorized members, including four public directors who “shall not be professionally familiar and associated with the design, construction, building, or furniture industries.” The bylaws provide for seven professional directors, each of whom must be a CID, representing the following interior design disciplines:

1. Two Residential Interior Designers
2. Workplace (i.e. Office, Retail) Interior Designer
3. Specialty (i.e. Hospitality, Healthcare, Education, Government) Interior Designer
4. Sustainability Interior Designer
5. Multi-Discipline Interior Designer
6. Interior Design Educator

Directors may serve a maximum of two full consecutive three-year terms. However, a director who has previously served may be renominated to the board after a three-year term break. CCIDC’s bylaws provide that its board should reasonably reflect representation from the various geographic areas of the state to the extent possible. The current composition of the Board of Directors is as follows:

Name	Original Appointment	Expiration of Current Term	Director Category
<p style="text-align: center;"><b>George Brazil (<i>Chair</i>)</b></p> <p>George Brazil is a Certified Interior Designer and professional member of ASID, where he served as Past President of the California North Chapter. He is principal and co-owner of the design firm SagreraBrazil Design, bringing over 25 years of experience in residential interiors. George is dedicated to advancing professional standards in interior design and promoting excellence across the built environment.</p>	01/11/2019	06/04/2026	Residential Director
<p style="text-align: center;"><b>Carley Roden (<i>Vice Chair</i>)</b></p> <p>Carley Roden is an Executive Business Administrator for a Class III Medical Device company in San Diego, California. With extensive experience in executive support, project management, and business development, she brings a strong organizational and strategic perspective to the Board. Carley holds a background in social and behavioral studies and previously served CCIDC as Executive Administrator and Certification Coordinator.</p>	06/07/2025	06/07/2028	Public Member
<p style="text-align: center;"><b>Julissa Garcia (<i>Treasurer</i>)</b></p> <p>Julissa Garcia is Principal and Owner of j.design.studio, a San Diego-based planning and design firm. A Certified Interior Designer with over 25 years in the building industry, she specializes in commercial design, ADA compliance, and building code regulations. Julissa is passionate about creating inclusive, functional spaces while ensuring adherence to design and construction standards.</p>	09/17/2022	06/07/2028	Commercial Director
<p style="text-align: center;"><b>Taylor Stead (<i>Secretary</i>)</b></p> <p>Taylor Stead is a Licensed Marriage and Family Therapist serving as a Public Director on the CCIDC Board. She earned a Master of Arts in Marital and Family Therapy from the University of San Diego and has extensive experience providing therapy to individuals, families, and groups. Taylor’s work focuses on mental health, well-being, and supporting diverse communities through collaborative care.</p>	01/21/2019	05/16/2026	Public Director

<p style="text-align: center;"><b>Gina Fabiola</b></p> <p>Gina Fabiola is a Certified Interior Designer and LEED Accredited Professional with over 10 years of experience in residential and commercial design. Passionate about sustainable and human-centered spaces, she is active in the design community through IIDA and ASID. Gina participated in the 2024 IIDA Emerging Leaders Program and served as the 2023 ASID Professional Development Events Committee Chair.</p>	06/07/2025	06/07/2028	Residential Director
<p style="text-align: center;"><b>Kathryn Hampton</b></p> <p>Kathryn Hampton is a Certified Interior Designer specializing in commercial design and the founder of K2S Studio. A graduate of Louisiana Tech University with a Bachelor of Fine Arts in Interior Design, she began her career in large corporate design firms before establishing her own practice. Kathryn’s diverse experience enables her to approach every project with both creative insight and technical precision.</p>	01/21/2023	05/16/2026	Multi-Discipline Director
<p style="text-align: center;"><b>Patricia Johnson</b></p> <p>Patricia Johnson is a Certified Interior Designer and Code Review Consultant for the City of Livermore, California. Before founding her consulting business, she held leadership roles as Captain, Deputy Fire Marshal, and Fire Marshal at UC Davis and the Santa Clara County Fire Department. Patricia’s expertise in fire safety, code compliance, and sustainable design informs her contributions to the Board.</p>	06/06/2020	05/16/2026	Sustainability Director
<p style="text-align: center;"><b>Lindsey Repp</b></p> <p>Lindsey Repp is a Global Real Estate Strategic Planner at CrowdStrike, Inc., with over 15 years of experience in corporate real estate and facilities management. She oversees planning for the company’s extensive global real estate portfolio, spanning more than 50 locations worldwide. Lindsey brings a strong business and operations perspective to the CCIDC Board, supporting design excellence and professional integrity.</p>	06/07/2025	06/07/2028	Public Director

<p style="text-align: center;"><b>Adam Sampson</b></p> <p>Adam Sampson is a global executive with extensive experience in product leadership across the life sciences, high-performance computing, construction, and government contracting industries. He has built a career developing innovative, profitable products and strengthening core revenue streams for global brands including American Express, eBay, Kohler, and Roca. Adam holds a Bachelor of Science in Mechanical Engineering from San Diego State University and is an Eagle Scout.</p>	01/17/2026	01/17/2029	Public Director
<p style="text-align: center;"><b>Sunny Zhao</b></p> <p>Sunny Zhao is an accomplished interior design professional with experience in residential, commercial, and institutional projects. Committed to creating human-centered, research-driven environments, Sunny approaches each project with creativity and analytical depth. She actively engages in professional development and industry collaboration, promoting innovation and connection within the design community.</p>	06/07/2025	06/07/2028	Specialty Director
<i>Vacant</i>	--	--	Education Director

Per CCIDC’s bylaws, a director may be removed through a two-thirds vote of the Board of Directors. The director subject to removal must be given fifteen days’ notice and an opportunity to be heard. The Board, or a committee within the Board, then makes a final decision regarding the proposed termination.

CCIDC’s bylaws authorize the Board of Directors to designate committees, including both advisory committees and committees with legal authority to act for the Board of Directors. The current standing committees are as follows:

- **Executive Committee:** The Executive Committee is composed of the duly elected officers of the Board: the Chair, Vice-Chair, Treasurer, and Secretary. This committee is responsible for managing day-to-day operational oversight and may act on behalf of the full Board when urgent decisions are required and a full board meeting cannot be immediately convened. Operating in accordance with CCIDC’s Bylaws, the Executive Committee is authorized to make decisions that preserve the integrity and operational stability of the corporation during emergency situations. It serves as the central decision-making body between regular board meetings.
- **Compensation Committee:** Comprised of the Chair, Treasurer, and Secretary, the Compensation Committee is responsible for the annual performance evaluation of the Executive Director. The process includes a confidential survey of the full Board. Based on this review, the committee determines appropriate compensation and benefit adjustments, ensuring transparency, accountability, and alignment with nonprofit governance best practices.

- **Marketing & Outreach Committee:** The Marketing & Outreach Committee includes one to two active board members, the Executive Director, and outside consultants as needed. Its primary responsibility is to guide outreach and communication strategies to effectively engage the public and CCIDC's key constituencies, including CIDs, CID candidates, Consumers and the public. Communication is facilitated through CCIDC's website, which features four distinct portals tailored to the needs of its core audiences. In addition, the committee oversees a highly successful education and engagement program that brings the Executive Director to interior design programs across California, delivering in-person and virtual presentations. These presentations have become integral to the curriculum at many colleges and universities offering interior design education.
- **Interior Design Education Committee:** The Interior Design Education Committee consists of board members who are both Certified Interior Designers and interior design educators, along with designated staff. The committee's role is to ensure that CCIDC's examination protocols adhere to California legal and regulatory standards, specifically those codified in Business and Professions Code § 139 and overseen by the Office of Examination Resources (OPES) within the DCA. To safeguard California consumers, the committee mandates that any examination used to qualify candidates for certification, namely the IDEX exam, must rigorously test on: California Building Codes, Title 24, All applicable codes and regulations relevant to interior design practice in the state.
- **Compliance Committee:** The Compliance Committee oversees the integrity and consistency of the CID approval process, ensuring that every candidate has met the full requirements for education, work experience, and examination before being awarded certification. All application materials are compiled by CCIDC staff and forwarded electronically to the Compliance Committee for final verification and approval typically within one to two business days after requirements are met. A designated board member serves as the standing Compliance Committee representative, reviewing each candidate file personally. This process ensures that certification decisions are never made solely by staff or external agents, maintaining the independence and integrity of the approval process.

CCIDC's Board of Directors previously established a Uniform Plan Submission Committee in 2021, which included representatives from the International Interior Design Association, American Institute of Architects California, the California Building Officials association, and the National Kitchen and Bath Association. The Committee's purpose was to strengthen the existing title act framework and support consistent acceptance of plans prepared by interior designers across building departments. Committee meetings concluded in early 2024 following the introduction of legislation that sought to replace the existing title act structure with a practice act, which CCIDC believes resulted in an inability for the Committee's participating organizations to continue effectively while the legislation was pending. It was determined that the Uniform Plan Submission Committee would be succeeded by the Advocacy Committee beginning in the first quarter of 2026.

Each year, CCIDC establishes an annual meeting calendar that includes the three regularly scheduled board meetings, which are typically held at the end of January, June, and September. Meetings of CCIDC's Board of Directors are required to comply with the Bagley-Keene Open Meeting Act. CCIDC conducts its Board meetings entirely virtually via the Zoom platform. CCIDC believes that the virtual format has made meetings more accessible to stakeholders who may not have otherwise been able to attend in person due to geographic or scheduling constraints. CCIDC's Board of Directors has not experienced any issues with meeting its quorum requirements, and CCIDC reports that nearly all Board members are able to participate regularly.

## Staff

CCIDC's staff is comprised of two positions: an Executive Director and a Certification Program Manager. Roze Wiebe is the current Executive Director and has been in that position since 2017. Prior to her Executive Director role, Roze was CCIDC's Administrative Director. Camryn Burns has served as CCIDC's Certification Program Manager since August 2022, succeeding Carley Roden, who now serves as a public member on CCIDC's Board of Directors.

As a nonprofit corporation, CCIDC may hire outside consultants as necessary. Currently, CCIDC relies on outside consultants or volunteers to focus on consumer outreach. As a nonprofit regulatory entity, CCIDC does not have "cite and fine" authority and does not employ investigators or staff attorneys.

## Fiscal and Fund Analysis

Unlike the State of California, CCIDC's fiscal calendar runs from January 1 through December 31. CCIDC's fund balance has been somewhat uneven over the past several years, which CCIDC attributes to gradual fluctuations in the number of CIDs. CCIDC states that these changes reflect broader workforce trends, including retirements among long-tenured practitioners and the routine movement of professionals across state lines or into other occupational fields. CCIDC believes that while such shifts are expected, they have contributed to modest impacts on CCIDC's overall revenue. CCIDC is not required to abide by any statutory mandate for holding funds in reserve.

	2022	2023	2024	2025
Beginning Balance	\$72,600	\$53,500	\$78,300	\$30,800
Revenue	\$241,600	\$240,400	\$232,400	\$262,100
Expenditures	\$260,600	\$215,700	\$279,900	\$222,600
Fund Balance	\$53,600	\$78,200	\$30,800	\$70,300
Months in Reserve	2.5	4.4	1.3	3.8

As a nongovernmental, nonprofit organization, CCIDC does not receive any appropriation from the State Budget and is entirely self-funded through fees. To address ongoing financial challenges and improve revenue stability, CCIDC undertook a significant revision to its certification renewal structure in 2017. Historically, certification renewals were priced at a flat fee that included a rubber stamp and ID card. Beginning in 2017, CCIDC implemented a tiered renewal fee structure that offered CIDs four renewal package options based on their individual needs and preferences.

Certification and renewal fees, which are charged biennially and make up over 75 percent of CCIDC's revenue, were recently increased in January 2023 from \$250 to \$275, then again in January 2025 to \$300. Additional fee increases took place in January 2025, including an increase in the CID rubber stamp fee by \$50 and an increase in the IDEX exam application fee from \$150 to \$200. CCIDC also increased the fee for Emeritus certification, available to CIDs who are aged 62 or older and are contemplating retirement from active practice, from \$150 to \$200.

The majority of CCIDC's spending is related to administrative functions, with approximately \$141,300 in expenditures in 2025. CCIDC does not break out administration costs by examination and certification. CCIDC tracks personnel expenses by salaries, health and worker's compensation insurance, payroll expenses, and employer taxes, among others in order to arrive at an "administration" number. CCIDC does not have an enforcement program or a diversion program.

## Certification

The only professionals certified by CCIDC are CIDs. As of December 2025, there are 1,722 active CIDs. This population has seen approximately a 10 percent reduction over the past four years, continuing a trend noted during CCIDC's previous sunset review. Meanwhile, the number of retired CIDs has gone up approximately 12 percent, which correlates with workforce trends observed by CCIDC. According to the Bureau of Labor Statistics, as of May 2024 there are approximately 8,360 interior designers working in California, which means the majority of interior designers are not certified.

Certified Interior Designers			
2022	2023	2024	2025
1,923	1,914	1,712	1,722

CCIDC has not denied any applications for certification over the past four years for any reason. CCIDC states that no applicant has ever disclosed that they have been convicted of any crime. CCIDC reports that it has significantly reduced the average processing time for certification applications through the implementation of a new electronic application system along with other technological and procedural enhancements, and processing times are well within the organization's performance targets. Certifications are valid for 24 months and must be renewed biennially.

Certifications Renewed			
2022	2023	2024	2025
760	785	632	678

There are four pathways available to obtain interior design certification:

- **Pathway 1:** Is reserved for those applicants who have enough education or experience to be eligible to take IDEX exam, but do not meet the work experience requirement. A candidate under Path 1 may sit for the IDEX exam while continuing to gain the minimum work experience needed to become a CID. Path 1 candidates may take the IDEX exam upon graduating from school, or if they have a minimum of 5 years work experience. Upon successful completion of the IDEX exam, the CCIDC holds these applicant files until all education and experience requirements are met and will then issue a certificate upon providing the required information to CCIDC.
- **Pathway 2:** Candidates who have the requisite education and/or work experience and only need to take the IDEX exam.
- **Pathway 3:** This pathway is the same as Path 2, but candidates' education and work experience documentation is not required because they hold one of the accepted national examinations and the documentation is the same or exceeds the certification requirement. All they need to provide is proof of their national examination. They also receive a \$100.00 application fee discount as an incentive to becoming certified and because of the shortened documentation process.
- **Pathway 4:** Candidates go through the exact same process as Path 3 with the addition of five additional courses on California Codes and Regulations created by the International Code Council (ICC) and CCIDC. These additional courses allow CIDs to obtain commercial designation status in addition to their certification.

Statute authorizes CCIDC to issue a commercial designation to a CID who, in addition to the requirements for certification, passes additional interior design courses and examinations, as determined by the CCIDC. In order to obtain the commercial designation, an applicant must take and pass one of six national examinations in addition to the IDEX exam, or take the Residential Interior Design Qualifying Certification examination, which is a national examination, plus have two years diversified interior design experience along with the passage of the IDEX exam.

## **Education**

CCIDC does not approve schools or programs offering interior design courses or education. Instead, CCIDC simply verifies the appropriate education and work experience has been completed for purposes of certification. CCIDC maintains and regularly updates a comprehensive listing of interior design programs offered throughout California. This list is publicly available on the CCIDC website and is intended as a resource for prospective interior design students, those considering entering the profession, and currently certified interior designers seeking continuing education opportunities. There are currently 43 programs offering interior design education in California, many of which are part of the California State University and the California Community College systems.

There is no statutory requirement for CIDs to complete continuing education in order to renew their certificate; however, CCIDC internally established a policy to require certificate holders to obtain 10 hours of continuing education every two years in any subject related to interior design. CIDs with a commercial designation are required to take five hours of continuing education in courses related to California building code. All others may choose the courses as long as they are from an approved provider. CCIDC accepts continuing education from a variety of providers including a number of different construction/design industry organizations. CCIDC also provides a page on its web site for CIDs that offer relevant courses, many of which are free. CCIDC conducts continuing education audits on all CIDs as part of its certification renewal process and monitors compliance on an ongoing basis through the organization's online CID Account portal, which serves as the official registry for each CID's continuing education activity.

## **Examination**

Statute specifies in the definition of a CID that the applicant has demonstrated their competency "by means of education, experience, and examination." While there are national certifying examinations for interior design professionals, CCIDC requires that applicants take and pass only the IDEX, which is a California-specific examination. In 2008, CCIDC, under the direction of the Joint Committee, eliminated the requirement for using a national examination and instead required an examination that includes testing on the requirements that are germane to the practice of interior design in California, including California Building Codes and Title 24 related to building energy standards.

The IDEX exam was revised in 2021 following a review by a task force of subject matter experts after the adoption of the new 2018 California Building Code. The examination covers both residential and commercial building codes and is divided into eleven distinct domains: Legal Requirements and Responsibilities, Professional Practice and Ethics, Design Standards, Administration, Occupancy Classifications, Types of Construction, Fire Protection Requirements, Interior Finish, Means of Egress, Accessibility, Building Systems, and Miscellaneous Code Provisions. Because the examination is split roughly evenly between residential and commercial code, CCIDC acknowledges that candidates working primarily in either residential or commercial sectors may face challenges if unfamiliar with the complementary code set. However, pass rates have consistently been relatively high.

<b>Examination Pass Rates</b>			
<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
59%	63%	68%	77%

The administration of the IDEX exam is conducted entirely online through a professional examination vendor twice per year. Since May 2020, CCIDC has offered a live remote proctoring option for the examination, which utilizes secure internet-based technology and real-time monitoring to ensure exam integrity. In-person testing is offered by CCIDC’s testing provider, Measure Learning, at nearly 1,000 proctored locations in over 700 cities across more than 70 countries.

**Enforcement**

CCIDC does not operate a formal enforcement program, with the explanation that it does not possess statutory authority to cite or fine individuals and that it has no enforcement jurisdiction under state law, as certification for interior designers in California is a voluntary title act, not a practice act. The only restriction imposed by statute is on the use of the protected title “Certified Interior Designer,” which may only be used by individuals certified by CCIDC. When CCIDC determines that an individual is unlawfully using the protected title, it may issue cease and desist letters and refer the matter to appropriate legal counsel when necessary.

CCIDC receives and reviews complaints submitted by members of the public, CIDs, and others within the interior design and construction community. Only a very small number of formal complaints are typically received each year. CCIDC will refer complaints regarding individuals engaging in architectural or engineering work without the appropriate licensing board within the DCA. According to CCIDC, most complaints it received over the past several years have pertained to financial or contractual disputes between clients and interior designers. CCIDC reports that none of the complaints it has received by CCIDC over the past four years have involved violations that posed a direct threat to public health, safety, or welfare.

Over the past four years, only one CID has been subject to disciplinary action. In that case, CCIDC reports that the individual was placed on probation and required to complete two continuing education courses in ethics before their certification was reinstated. In the past, CCIDC has sometimes successfully mediated disputes, resulting in outcomes that CCIDC believes are satisfactory for both the complainant and the CID.

**Public Information Policies**

CCIDC maintains an official website, which was redesigned and modernized in 2017 to incorporate video content, webinars, and links to CCIDC’s official YouTube channel. CCIDC also utilizes a range of in-house web applications and external social media platforms including Facebook, Instagram, Twitter, and LinkedIn, to provide regular updates and maintain transparency with the public. Information related to public board meetings, including dates, times, locations, and agendas, is published on the CCIDC website and distributed via CCIDC’s electronic newsletter. CCIDC also provides consumer alerts, a comprehensive online complaint process, disciplinary actions, and a consumer satisfaction survey. Final meeting minutes are also posted to the CCIDC website following their approval by the Board of Directors.

## PRIOR SUNSET REVIEW: CHANGES AND IMPROVEMENTS

CCIDC last underwent sunset review in 2022. During the prior sunset review, the Committees raised a number of issues and provided recommendations. CCIDC's most recent sunset report to the Committees, dated December 2025, did not specifically respond to the issues raised during its 2022 review, but instead appears to provide updates to issues raised during its prior review in 2017. Many of the issues raised in 2022 are still of concern and are further discussed under "Current Sunset Review Issues."

## CURRENT SUNSET REVIEW ISSUES FOR THE CALIFORNIA COUNCIL FOR INTERIOR DESIGN CERTIFICATION

### ADMINISTRATIVE ISSUES

**ISSUE #1: *Board of Directors Composition. Does the current membership on CCIDC's Board of Directors provide a sufficient balance of disinterested public oversight and professional expertise?***

**Background:** Unlike the authorizing acts for some other nonprofit councils, statute does not specify the membership composition for CCIDC's Board of Directors. Statute also does not identify which entities are responsible for appointing directors. Section 5800 of the Business and Professions Code simply requires that CCIDC "consist of CIDs" and that its governing board include "representatives of the public."

This language is reflective of how appointees are typically apportioned for state licensing boards, in which members are generally divided into two categories: public members and professional members. Public members are broadly defined as persons without any vested interest in the regulated profession—in other words, they do not hold a license to practice any activities regulated by the board. Correspondingly, professional members reflect the perspectives of the regulated profession and offer expertise relevant to decisions being made by the board.

While statutes dictating board memberships vary, most regulatory boards are roughly split equally between public and professional members, with one classification often retaining a slight majority. For example, the California Architects Board is evenly split at five professional members, five public. The Medical Board of California has a professional majority with eight physician members versus five public members. The Board of Vocational Nursing and Psychiatric Technicians has a slight public majority with six public members and five licensed members.

Prior to 2024, five members of CCIDC's Board of Directors represented specifically designated national professional interior design associations: the American Society of Interior Designers (ASID); the Interior Design Society (IDS); the International Interior Design Association (IIDA); the International Furnishing and Design Associates (IFDA); and the National Kitchen and Bath Association (NKBA). There was also a professional member who was not affiliated with any of the above-mentioned organizations but represented an "independent" or non-affiliated interior designer. There was also a board seat for educators, designated for the Interior Design Education Council (IDEC). CCIDC's bylaws specified that a nominating committee, established by CCIDC, appointed five members, including four additional public members who were not current or former associates with the interior design profession. During CCIDC's prior sunset review, neither ASID nor IDEC had elected to participate in appointing their respective designated seat holder, resulting in the full CCIDC Board of Directors choosing directors from volunteer candidates possessing the appropriate designations and qualifications.

This structure was reconstituted in 2024 when the CCIDC Board of Directors voted to amend its bylaws to replace the appointing authority framework with a prescribed allocation of director seats to specified practice disciplines. Instead of requiring directors to be affiliated with certain organizations, CID board members are now selected based on their expertise in distinct areas of interior design practice. The bylaws provide for seven professional directors representing the following disciplines: residential interior design (which is allotted two directors); workplace interior design; specialty interior design; sustainability interior design; multi-discipline interior design; and interior design education.

The revised bylaws did not change the ratio of CID members to public members, which remains seven-to-four in favor of representatives of the profession. Regulatory boards on which professional members constitute a majority have been scrutinized for potential antitrust implications. In 2015, the Supreme Court of the United States ruled in *North Carolina State Board of Dental Examiners v. Federal Trade Commission* that when a state regulatory board features a majority share of active market participants, any allegedly anticompetitive decision-making may not be subject to *Parker* antitrust litigation immunity unless there is “active state supervision” to ensure that all delegated authority is being executed in the interest of the public and not the private commercial interests of the members. This has led many to believe that boards are better served by having a public member majority. However, the Supreme Court’s ruling has yet to result in any meaningful legal challenges to California’s board-administered licensing schemes, and the composition of a private nonprofit council’s Board of Directors is even less likely to invoke substantial legal risk.

Nevertheless, given the heightened sensitivity to the composition of oversight entities, the Legislature may wish to establish more specific requirements for how professional members are appointed to CCIDC’s Board of Directors and how many directors serve as representatives of the public. The Legislature may choose to codify the current structure, or to provide for more general direction while still affording CCIDC flexibility in future bylaw changes. While this additional statutory clarity would likely not be necessary to address any current issues with CCIDC’s governing board, it may be considered appropriate if CCIDC is to continue operating as a private substitution for a state agency.

***Staff Recommendation:*** *The Council should advise the Committees as to how its Board of Directions functions and whether it believes greater statutory specificity regarding its member composition could better empower its governance.*

***ISSUE #2: Director Terms. Do the limits on director terms established in CCIDC’s bylaws sufficiently provide for independent and dynamic representation on its Board of Directors?***

**Background:** CCIDC’s bylaws for its Board of Directors specify that a director may serve no more than two full consecutive three-year terms. However, a director who has termed out is eligible to be renominated to the Board of Directors after one three-year term break. The bylaws specifically prohibit directors from circumventing these restrictions by moving from one class of seat on the board to another.

In addition to CCIDC, there are two other nonprofit councils bestowed with similar responsibilities by the Legislature, one of which is the California Massage Therapy Council (CAMTC). In 2024, the Legislature enacted SB 1451 (Committee on Business, Professions, and Economic Development), which provided for clearer term limits for CAMTC’s Board of Directors. The bill provided that members could serve for up to two four-year terms before needing to be replaced, with up to one year’s grace period provided for a successor to be appointed. The bill also required directors who had served on CAMTC’s Board of Directors for 8 out of the past 10 years to vacate their appointment effective July 1, 2025.

The primary purpose of the language in SB 1451 was to respond to concerns expressed by the Committees that the membership of CAMTC's Board of Directors had become institutionalized to the degree where there was an expectation that directors "loyally affirm the decisions of the Council's staff, rather than provide independent oversight of its functions on behalf of the public." There have not been similar criticisms of CCIDC's Board of Directors, which already voluntarily imposes term limits on its membership. However, as the term limits established in CCIDC's bylaws do not align with the term limits that the Legislature chose to establish in statute for CAMTC, the Legislature should consider whether the divergent requirements should be reconciled or whether CCIDC's bylaws already provide for an appropriate balance of director expertise and fresh perspectives.

**Staff Recommendation:** *CCIDC should explain the rationale behind its current bylaws establishing director term limits and whether it would oppose any legislative modifications to those provisions.*

**ISSUE #3:** *Staff Compensation. Should the financial compensation for CCIDC's be statutorily limited to ensure parity with comparable leadership at other regulatory entities?*

**Background:** As a private nonprofit council, CCIDC's employees are not subject to civil service requirements and its Board of Directors has broad discretion to make hiring decisions and set compensation. Nonprofit corporations like CCIDC are generally authorized to grant compensation to their executives that is deemed "reasonable" by the Internal Revenue Service (IRS). During multiple prior sunset reviews of CAMTC, however, it was noted that CAMTC's chief executive officer received an extraordinarily high salary, most recently identified as \$615,897. In response to obloquy prompted by this revelation, the Legislature enacted language through AB 1504 (Berman) in 2025 to cap the salary of CAMTC's executive staff to the salary provided to the Secretary of the Business, Consumer Services, and Housing Agency (\$247,000).

To be clear, the compensation paid to CCIDC's executive staff does not appear to even remotely approach the inappropriate amounts previously paid to employees of CAMTC. CCIDC's Compensation Committee, comprised of the Chair, Treasurer, and Secretary of its Board of Directors, conducts an annual performance evaluation of CCIDC's executive director and determines appropriate compensation and benefit adjustments. There is currently no reason to believe that CCIDC would increase its executive compensation to a degree that would implicate the same concerns as those regarding CAMTC.

However, given the precedent established by the Legislature in setting guardrails around executive compensation for CAMTC, it may simply be prudent to consider whether there is a desire to make that policy consistent for all similar councils established in statute to oversee professionals. Assemblymember Berman, the formal author of CAMTC's sunset bill, submitted a letter to the Assembly Journal stating: "The salary cap established in AB 1504 narrowly addresses the unusual nature of CAMTC, which is entrusted with serving an important function ordinarily administered by a state entity. This language is unique to this circumstance, and is in no way an indication of the Legislature's intention to establish compensation caps on any other nonprofits in the future." While this remains true for nonprofit corporations generally, CCIDC is similarly entrusted with substantially the same functions as CAMTC, and there is therefore an argument that the Legislature should establish a consistent policy.

**Staff Recommendation:** *CCIDC should advise the committees as to how it determines what compensation is appropriate for its executive staff and whether it would oppose a statutory ceiling for that compensation consistent with similar nonprofit councils.*

**ISSUE #4: *Public Records Act. Should CCIDC be required to make its records available for public inspection in a manner consistent with the California Public Records Act?***

**Background:** The California Public Records Act (CPRA) provides that “public records are open to inspection at all times during the office hours of the state or local agency and every person has a right to inspect any public record.” The CPRA’s definition of “state agency” includes “every state office, officer, department, bureau, board, and commission or other state body or agency,” but likely does not include private nonprofit councils. In *California State University (CSU) v. Superior Court* (2011), the court ruled that CSU auxiliary organizations, which are private nonprofit corporations operating pursuant to statute, are not state agencies subject to the CPRA. Stakeholder comments submitted by the California chapters of the International Interior Design Association (IIDA) allege that CCIDC “does not respond to Public Records requests and has asserted as a nonprofit it does not need to comply with such requests.”

Language enacted in CAMTC’s most recent sunset bill, AB 1504, requires CAMTC to “make the records of the Council available for public inspection in a manner consistent with the California Public Records Act ... as though the Council were a public agency for purposes of that act.” The law requires compliance with the spirit of the CPRA only “to the extent practicable” and provides CAMTC with substantial discretion not to disclose “investigatory records or records containing sensitive information.” The intent of this language was to recognize the quasi-public nature of nonprofit councils like CAMTC and enhance transparency and public accountability. The Legislature may wish to consider extending similar requirements to CCIDC, while remaining mindful of whether CCIDC could administratively sustain any new responsibilities to respond to requests for records.

**Staff Recommendation:** *CCIDC should provide an overview of what efforts it makes to be transparent to the public despite the lack of applicability of the CPRA and provide any perspective on what requiring some form of compliance with public records laws would do to its current operations.*

**ISSUE #5: *Administrative Procedure Act. Should the adoption of bylaws by CCIDC’s Board of Directors be subjected to requirements similar to those under the Administrative Procedure Act?***

**Background:** The Administrative Procedure Act (APA) establishes basic minimum requirements for the adoption of regulations and the conduct of administrative hearings and adjudication. The APA ensures that agency rulemaking and administrative hearings provide for public participation. Chapter 3.5, which establishes the public process for establishing administrative regulations, is expressly applied only to a state agency, as narrowly defined, presumably rendering it inapplicable to the CCIDC.

AB 1504 established new requirements for CAMTC’s Board of Directors to “provide a meaningful opportunity for public participation in the adoption, amendment, or repeal of any policies, procedures, rules, or bylaws that substantially impact the rights, benefits, privileges, duties, obligations, or responsibilities of individuals or entities subject to certification or approval by the Council,” with specified examples. At a minimum, CAMTC must now “publish the complete text of any policies, procedures, rules, or bylaws proposed for adoption, amendment, or repeal along with a summary of the changes being considered for a period of at least 45 calendar days before the adoption, amendment, or repeal” and accept public comment during that period. The Legislature may wish to consider imposing similar requirements on CCIDC as a nonprofit council with similar responsibilities to the public.

**Staff Recommendation:** *CCIDC should explain what policies it follows in lieu of provisions of the APA and whether it believes existing law provides for an appropriate degree of transparency.*

**ISSUE #6: *Bagley-Keene Open Meeting Act. Are meetings of CCIDC’s Board of Directors in compliance with the requirements of Bagley-Keene?***

**Background:** The Bagley Keene Open Meeting Act requires meetings of regulatory bodies to be noticed and made available for attendance or observation by members of the public. The intent of the Act is “that actions of state agencies be taken openly and that their deliberation be conducted openly.” These requirements are applied to “state bodies,” which are defined within statute as including “a board, commission, committee, or similar multimember body that exercises any authority of a state body delegated to it by that state body.” All three nonprofit councils subject to sunset review have statutory language expressly requiring compliance with Bagley-Keene, including CCIDC.

During CCIDC’s most recent sunset review in 2022, an issue was raised that it was unclear if CCIDC was abiding by the requirements of Bagley-Keene. Specifically, the provisions of the Council’s bylaws providing for public notice and the publication of meeting materials did not appear to conform to the Act. Additionally, because Bagley-Keene is nuanced and complex, many incoming members of boards overseen by the DCA are required to attend training programs that cover the important elements of the Act; it did not appear that CCIDC required members of its Board of Directors to take similar training. In response to this prior sunset issue, CCIDC stated that it does cover Bagley-Keene during new director orientation, and CCIDC has implied that their meetings were sufficiently open to the public. However, comments submitted by IIDA allege that CCIDC has asserted that it is not subject to open meeting laws.

CCIDC’s most recent report to the Committees continues to raise questions as to whether the Council is in compliance with Bagley-Keene. For example, CCIDC’s report indicates that every member of its Board of Directors has participated in board meetings via the Zoom virtual meeting platform since 2022. This would not be lawful under the current requirements of Bagley-Keene, which provides two options for teleconferencing by public bodies: either every location where a member of a body is participating remotely must be accessible to all members of the public, or a majority of the members of a body to be physically present at the same teleconference location.<sup>32</sup> While these requirements were more flexible during the COVID-19 pandemic, the law has been more restrictive for several years now. CCIDC may simply not be aware of the legal requirements for teleconference meetings.

**Staff Recommendation:** *CCIDC should inform the Committees of whether it believes the meetings of its Board of Directors comply with Bagley-Keene and how it will ensure compliance going forward.*

**FISCAL ISSUES**

**ISSUE #7: *Fund Condition Volatility. Are the fluctuations in CCIDC’s annual revenues and fund balances a future cause for concern?***

**Background:** CCIDC is funded entirely through the collection of fees charged to CIDs, which are typically paid biennially. Fiscal data provided in CCIDC’s sunset report reveals that CCIDC’s fund balance tends to swing significantly from one year to the next; for example, between 2022 and 2025, CCIDC’s fund balance went from \$53.6 thousand in 2022 to \$78.2 thousand in 2023, then from \$31.8 thousand in 2024 to \$70.3 thousand in 2025. There has been a corresponding pattern with the number of months held in reserve, which doubles and halves from year to year based on revenues.

<sup>32</sup> California Department of Justice, Office of the Attorney General, *Bagley-Keene Open Meeting Act Guide* (2024).

CCIDC states that “it is important to note that CCIDC’s certification renewal cycle follows a two-year pattern, with a higher volume of renewals occurring in odd-numbered years” and notes that a similar cyclical pattern has been observed since the Council was created. Recent changes to CCIDC’s fee structure were intended to address ongoing financial challenges and improve revenue stability. However, the fluctuations in CCIDC’s fund condition are still irregular and further action may be advisable.

**Staff Recommendation:** *CCIDC should provide the Committees with an overview of its current financial outlook and whether it is concerned about the volatility of its current fund condition.*

### **PRACTICE ISSUES**

**ISSUE #8:** *Stamp Acceptance. Has there been any improvement in the rate of acceptance and approval of plans submitted by CIDs to local building departments?*

**Background:** The issue of stamp acceptance was the primary genesis for CCIDC’s creation, and the issue has been raised in nearly every sunset review of CCIDC by the Legislature. Certification was intended to help alleviate confusion among local building authorities in circumstances where building permits are required and provide assurance in knowing that a CID is competent to provide interior design services in accordance with the state building codes for the work they are allowed to perform. However, there is currently disagreement in regard to whether certification has proven to be an effective solution to challenges with stamp acceptance for interior designers.

Stakeholder comments submitted by IIDA present one perspective as follows: “The Council’s voluntary existence creates confusion; they offer stamps that confer no privileges. Authorities Having Jurisdiction often refuse to accept these stamps, given that they are not fully backed by the State. These stamps are precluded from including the seal of California. They note in their report that several jurisdictions routinely reject plans submitted by designers.” IIDA argues that CIDs are prohibited from being in responsible charge of certain projects, architectural firms do not recognize a CID certification for employment, and that a 15-year review of CID permit submissions in San Francisco resulted in fewer than 50 CIDs filing only 124 permits during that time span.

CCIDC, meanwhile, asserts that the stamp acceptance issue is “more limited in scope than previously assumed.” CCIDC references the small number of plan check denial cases it has reviewed, in which a majority of the rejected plans were subsequently accepted, and argues that “these outcomes suggest that most issues surrounding CID plan submissions arise not from systemic opposition, but rather from misunderstandings or lack of familiarity with the Title Act and the legal scope of [CIDs]. In most cases, effective communication and targeted outreach have led to successful resolution.”

Notwithstanding the scale of the problem, there have continued to be numerous stakeholder discussions around how to improve recognition of interior designers among local building officials. CCIDC has proposed potential solutions, including adding CIDs to the statutory definition of “registered design professional.” However, CCIDC disbanded its Uniform Plan Submission Committee following IIDA’s decision to pursue legislation to establish licensure for interior designers in California.

**Staff Recommendation:** *CCIDC should provide the Committees with what it believes to be the current state of CID stamp acceptance and why it believes including CIDs in the statutory definition of “registered design professional” would resolve ambiguity and promote equitable recognition of CIDs.*

## **CERTIFICATION ISSUES**

**ISSUE #9:** *Commercial Designation. Has CCIDC's optional commercial designation been significantly utilized by CIDs and has it improved the successful practice of commercial designers?*

**Background:** In November of 2017, CCIDC's Board of Directors unanimously voted to create an additional path of certification for candidates who wish to obtain a "commercial designation" as part of their certification. As noted by the CCIDC, the purpose of this program is to allow local building officials to identify CIDs who have prepared nonstructural, nonseismic commercial tenant improvement plans that do not require an architect or engineer's stamp or signature who are submitting plans for the purpose of obtaining a building permit. The goal of the designation is to make it easier on plan reviewers to acknowledge the certification of the CID and approve plans (as authorized) without the requirement to obtain additional sign-offs from an architect or engineer as long as the project specifications meet the current exemptions to any licensure or practice requirements for architects or engineers.

The question of whether CCIDC should offer a commercial designation was first raised during the CCIDC's sunset review in 2017. In response to the sunset issue, in September 2017, CCIDC held a strategic planning meeting to address the topic, which reportedly included stakeholders, CIDs, and public participants. The outcome of the meeting was the creation of the commercial designation for CIDs who wish to use that particular designation when submitting plans for approval or providing services. There is no prohibition on a CID from providing commercial design services without the commercial designation, as it is voluntary. As of CCIDC's last sunset review in 2022, CCIDC reported that nearly 200 candidates have successfully obtained the commercial designation.

In 2023, the Legislature enacted SB 816 (Roth), which codified the commercial designation. CCIDC believes that the commercial designation provides visibility for the commercial interior design sector while preserving the unified structure of the CID credential. However, it is unclear whether the designation has been widely adopted or whether it has resulted in commercial interior designers receiving more recognition or parity with other design professionals. It would be helpful for the Committees to hear CCIDC's perspective on how implementation of the commercial designation has provided benefit.

**Staff Recommendation:** *CCIDC should provide the Committees with updated information regarding the commercial designation program, including how many CIDs have obtained the designation and whether it has increased stamp acceptance for CIDs working within the commercial sector.*

**ISSUE #10:** *Certification versus Licensure. Should the voluntary certification program administered by CCIDC be converted to a mandatory licensure program administered by a state board?*

**Background:** As previously discussed, early efforts to clarify the regulation and scope of interior design practice sought to establish some form of oversight under a licensing board within the DCA. Throughout the 1980s and 1990s, bills were introduced to place interior designers, as variably defined, within the CSLB, BHGS, and CAB. Bills were also introduced to establish a new board specifically for interior designers within the DCA. Ultimately, the decision to place interior designers under a nonprofit council was a political compromise to overcome the Governor's opposition to the creation of a new state licensing board. The creation of other nonprofit councils, such as CAMTC, resulted from a similar history.

While a voluntary certification program administered by a private nonprofit fell short of the state licensure programs sought to be administered by a board within the DCA, stakeholders hoped that the recognition granted to CIDs in statute would be sufficient to afford interior designers greater parity with other design professionals. Anecdotally, however, many interior designers have indicated that the same problems persist relating to stamp acceptance and the relationships between CIDs and local building officials. Multiple bills have been introduced since CCIDC was created to convert private certification to state licensure, including AB 1796 (Jackson), which has been introduced this year to place licensure of commercial interior designers under CAB. That bill is pending and will be evaluated by the Legislature through the sunrise review process.

There are a number of legal implications to imposing licensure on a profession as opposed to providing for certification. An estimated 80 percent of professionals identified by the Bureau of Labor Statistics as interior designers working in California have chosen not to become certified by CCIDC; mandatory licensure would require some percentage of that population to qualify for and obtain a credential to continue practicing their profession. Current CIDs would also potentially encounter higher barriers to entry under the oversight of a state board, such as higher fees and more complex bureaucracy.

On the other hand, state licensure does have advantages over voluntary certification for professionals as well as the public. The greater property right associated with a required license is accompanied by stronger requirements for due process in terms of how licenses are granted, denied, suspended, or revoked. Transitioning from voluntary certification to a statewide license requirement would also arguably elevate the profession of interior design and align the industry with other design disciplines. Ultimately, however, any proposal to require a license must satisfy the criteria laid out by the sunrise review process, which focuses predominately on public protection.

***Staff Recommendation:*** *CCIDC should provide an update on any stakeholder discussions it has had with supporters of licensure and whether it believes certification and licensure are mutually exclusive.*

## **EDUCATION AND EXAMINATION ISSUES**

***ISSUE #11: Interior Design Examination. Does requiring applicants for certification to pass an examination that is exclusive to California impede the mobility and national recognition of CIDs?***

**Background:** When CCIDC was first created, three different examinations were accepted for certification. Applicants could submit proof of passage of either the National Council for Interior Design Qualification (NCIDQ) exam, the Council for Qualification of Residential Interior Designers (CQRID) exam, or portions of the National Kitchen and Bath Association exams. Each of these was a national examination that CCIDC played no role in developing, scoring, analyzing, or administering. CCIDC then required applicants to additionally pass the California Codes and Regulations Exam, a supplemental examination was then used to specifically test applicants on California building codes.

In 2003, SB 363 (Figueroa) required CCIDC to submit a report to the Joint Committee that “reviews and assesses the costs and benefits associated with the California Code and Regulations Examination and explores feasible alternatives to that examination.” Concerns were raised that requiring applicants to pass both national and state-specific examinations was needlessly complex and burdensome, and that the unique nature of California building codes should be the emphasis of the examination. As a result, in 2008 CCIDC established the IDEX exam, a single examination specific to California.

In addition to simplifying the examination process, the transition to the IDEX initially resulted in lower costs for CID applicants and additional revenue for CCIDC. However, the new requirements were criticized by some within the industry who noted that the NCIDQ exam was required to work in other states or to bid on a federal project. When AB 2482 (Ma) was introduced in 2012 to establish a state board for interior designers within the DCA, one of the arguments made by supporters was that the IDEX contributed to the lack of reciprocity between California and states that provided for state regulation of interior designers. IIDA continues to make these arguments, commenting during this sunset review that “mandating a California-only exam without a national exam deviates from the national standard.”

CCIDC’s transition from a combination of national and state-specific examination requirements to a single examination focused on California practice was the result of specific deliberation by the Legislature and was in response to identified deficiencies with the original framework. However, the fact that applicants for certification must exclusively take and pass the IDEX has further siloed interior designers working in California from other states where the profession is regulated differently. It has previously been suggested that CID applications could be allowed to obtain certification by passing either the IDEX exam and a supplemental exam *or* the NCIDQ exam. While there would likely be arguments against taking such an approach, the Committees may nevertheless wish to engage in a discussion about whether changes to CCIDC’s examination requirements could be made to improve the national mobility of CIDs in their practice.

***Staff Recommendation:*** *CCIDC should provide an overview of its examination requirements and opine on whether it believes there would be benefit in exploring ways to incorporate a national exam into the pathways to certification in California.*

### **TECHNICAL CLEANUP**

#### ***ISSUE #12: Technical Cleanup. Is there a need for technical cleanup?***

***Background:*** As the interior design profession continues to evolve and new laws are enacted, provisions of the Business and Professions Code relating to interior design may become outmoded or superfluous.

***Staff Recommendation:*** *CCIDC should work with the Committees to identify and draft cleanup amendments for inclusion in its sunset bill.*

### **CONTINUED REGULATION OF THE INTERIOR DESIGN PROFESSION BY THE CALIFORNIA COUNCIL FOR INTERIOR DESIGN CERTIFICATION**

#### ***ISSUE #13: Continued Regulation. Should the certification of interior design professionals be continued and be administered by CCIDC?***

***Background:*** First established in 1991, CCIDC currently certifies approximately 1,722 interior designers, a substantial minority of what is believed to be the interior design profession statewide. The Council operates with a relatively small budget and employs only two staff. CCIDC does not have a formal enforcement program and has only received 223 documented complaints since it was founded. As a voluntary certification program for unlicensed design professionals, CCIDC’s legislative mandate is relatively modest, and its operations appear appropriately tailored to that scale.

CCIDC is one of three private nonprofit corporations that were created through legislation and must undergo sunset review as quasi-public entities. As previously discussed, serious issues have arisen with the conduct of other councils, prompting reconsideration as to the appropriateness of delegating the state function of overseeing regulated professionals to a nongovernmental entity. While nonprofit councils are certainly more efficient than state bureaucracies, this arguably comes at the cost of transparency, accountability, and due process.

Another recent development further undermines any presumption that statutory recognition of nonprofit councils like CCIDC should be extended. In November 2025, the nonprofit council CAMTC notified the Committees of its intention to engage in litigation to seek judicial review of several provisions of its recently enacted sunset bill, AB 1504. The letter specifically argued that the Legislature could not constitutionally place requirements on nonprofit councils that are not generally required of other nonprofits, that result in new costs without the provision of funding, or that interfere with private contracts.

While CAMTC appears to have since retracted its threat of litigation, this assertion that legislative reforms enacted through the sunset review process to programs administered by nonprofit councils are not enforceable has necessitated a pause to more thoroughly consider the appropriateness of the private council model prior to approving its continuation. This includes CCIDC, notwithstanding the scope of its certification program and any specific criticisms of how that program is administered. Meanwhile, some representatives of the interior design profession continue to advocate for state licensure, which surely has its own disadvantages that must be considered separately through the sunrise review process.

There are numerous reforms, both minor and significant, that may be contemplated by the Committees as CCIDC undergoes its current sunset review. Statute could certainly be revised to require the Council to emulate the state licensing board model, as was done for CAMTC. However, the Legislature should remain mindful that each potential new mandate or structural change could potentially come at the expense of the advantages that come with constructing CCIDC as a nonprofit corporation.

***Staff Recommendation:*** *The Committees should discuss whether CCIDC should remain established in state law as a quasi-public entity; if that statutory framework is extended, the Committees should consider enacting additional reforms to increase the transparency and accountability of the Council and support the statewide recognition of CIDs as design professionals.*