

RULEMAKING DOCKET NO. 24-0101-2601 (FEE RULE)
RECORD OF PUBLIC COMMENTS

Pursuant to Idaho Code section 67-5225(2)(b), the Division of Occupational and Professional Licenses (DOPL) provides the following record of public comments received for Rulemaking Docket No. 24-0101-2601, involving changes to the Rules of the Board of Architects and Landscape Architects (IDAPA 24.01.01).

This rulemaking explores adding a certification fee and Seal language for Certified Interior Designers. In 2026, the Idaho Legislature passed House Bill 790, which created a certification for interior designers and authorized the Board to promulgate rules for the administration of the certification. The certification fee will help pay for the administration costs of the new program.

Procedural Overview:

The Proposed Rule notice for this docket was published in the [August 5, 2026](#) Administrative Bulletin, in accordance with Idaho Code section 67-5225(2)(a). This notice contained details on how to submit public comments and participate in the public hearing set for August 13, 2026.

The 21-Day Public Comment Period began on August 5, 2026, and concluded on August 26, 2026.

August 13, 2026, Public Hearing:

The public hearing was attended by the following person(s):

- **American Institute of Architects Idaho Chapter:** Chad Blincoe
- **Council for Interior Design Qualification:** Matt Barusch
- **American Society of Interior Designers:** Adrienne Lane-Martin
- **International Interior Design Association:** Katie Edwards
- **Hawley Troxell:** Jacob Miller
- **Members of the Public:** Scott Mizée, Leslie

The table below summarizes the discussion at the August 13, 2026, public hearing.

Under the “Response” column, “Response” indicates the answer provided by DOPL staff to the member of the public, when responding to questions. Staff did not respond to comments from members of the public but will communicate all comments to the Board of Architects and Landscape Architects.

Stakeholder	IDAPA Rule(s)	Comments/ Questions	Response
Matt Barusch, CIDQ National	24.01.01	Asked if the Board will develop a process to verify credentials of applicants. Would like to see 200.03.b amended to account for the overlap in the professional scope of architecture and interior design. Would like to make sure that the citation to statute in 200.03.c is accurate.	Comments will be communicated to the Board
Adrienne Lane Martin	24.01.01	Asked for clarification on if public comment will be made available to the public.	Staff answered her question

Next Steps:

The Board of Architects and Landscape Architects will vote to adopt Pending Rules at their September 29, 2026, Board meeting.

Materials pertaining to the rulemaking, including any available preliminary rule drafts, can be found on the DOPL website via the following link: <https://dopl.idaho.gov/rulemaking/>

For assistance on technical questions concerning this rulemaking, please contact **Ryan Bernard, Legislative & Regulatory Affairs Chief**, at (775) 870-7926.

RULEMAKING DOCKET NO. 24-0101-2601 (FEE RULE)
DIVISION RESPONSE TO PUBLIC COMMENTS

The table below presents the Division's response to each public comment submitted for this rulemaking docket. The corresponding public comments appear on the following page(s) of this document.

Date	Submitted By	Response
8/6/2026	Khoi Vo, American Society of Interior Designers	These comments of support were communicated to the Board.
8/10/2026	Matthew Barusch, Council for Interior Design Qualification	These comments were communicated to the Board, and it agreed to incorporate suggested changes to remove Section 200.03.b and correct the statutory reference in Section 200.03.c.
8/11/2026	Cheryl Durst, International Interior Design Association	These comments were communicated to the Board, and it agreed to incorporate suggested changes to strike the word "principal" in Section 200.03.a.ii, remove Section 200.03.b, and replace the term "license" with "certification" in Section 400.03.
8/11/20226	Mae Myers, Idaho Consortium for Interior Design	These comments were communicated to the Board, and it agreed to incorporate suggested changes to strike the word "principal" in Section 200.03.a.ii, remove Section 200.03.b, and replace the term "license" with "certification" in Section 400.03.
8/13/2026	Allison Fleury	These comments of support were communicated to the Board.
8/21/2026	Mae Myers, Idaho Consortium for Interior Design	These follow up comments were communicated to the Board.

**Ryan Bernard**

Legislative and Regulatory Affairs Chief
Idaho Board of Architects and Landscape Architects
11341 W. Chinden Blvd.
Boise, ID 83714

Subject: 24.01.01- Rules of the Board of Architects and Landscape Architects

Dear Mr. Bernard:

On behalf of the American Society of Interior Designers (ASID), and in partnership with the Consortium for Interior Design – Idaho, we appreciate the opportunity to comment on the proposed rules under Docket No. 24.01.01 – Rules of the Board of Architects and Landscape Architects.

ASID represents interior designers nationwide, including Idaho, and is committed to advancing policies that protect public health, safety, and welfare. This rulemaking follows the passage of HB 790, which establishes a voluntary certification for interior designers and allows certified professionals to sign and seal certain non-structural drawings.

We support and echo the comments submitted by the Consortium for Interior Design – Idaho and offer additional national context. Idaho is now one of 33 U.S. jurisdictions (31 states, Puerto Rico, and Washington, D.C.) that regulate the interior design profession. In the past five years alone, many states — including Missouri, Alaska, Utah, Nebraska, Oklahoma, Pennsylvania, Wisconsin, Illinois, Iowa, and North Carolina — have advanced similar frameworks to recognize qualified interior designers.

Thank you for your time and consideration. We appreciate the Board's efforts to thoughtfully implement HB 790 and support a clear, effective regulatory framework. For any questions, please contact Lauren Earley, Esq., Director of Advocacy at ASID, at learley@asid.org.

Respectfully submitted,

Khoi Vo,
President & CEO
American Society of Interior Designers (ASID)



August 10, 2026

Ryan Bernard
Legislative and Regulatory Affairs Chief
Idaho Board of Architects and Landscape Architects
11341 W. Chinden Blvd.
Boise, ID 83714

RE: 24.01.01- Rules of the Board of Architects and Landscape Architects

Dear Mr. Bernard:

On behalf of CIDQ, we respectfully submit the following recommendations on the proposed rule 200(3) for the Board of Architects and Landscape Architects' consideration as it implements House Bill 790 and develops the regulatory framework governing Certified Interior Designers in Idaho.

About CIDQ

CIDQ is an independent, nonprofit regulatory association that strives to protect public health, safety, and welfare by setting minimum competency standards for interior designers and administering the NCIDQ Exam. Our membership comprises the regulatory boards in jurisdictions regulating the interior design profession using the NCIDQ Exam in the United States and Canada. While each jurisdiction is responsible for regulating the practice within its borders, CIDQ is committed to supporting member boards in ensuring reasonable, consistent, and defensible regulation of interior design across jurisdictions, and supports member boards in evaluating applicants for licensure in interior design through its examination and credentialing program.

Verification of Eligibility Requirements

As a result of House Bill 790, Idaho Code Section 54-306(8)(c) requires an applicant for the Certified Interior Designer title to have passed the NCIDQ Examination administered by CIDQ, as well as requiring applicants to satisfy the examination's education and experience requirements, and requiring the individual to maintain active NCIDQ certification, thereby demonstrating compliance with continuing education requirements. **We recommend that the Board require NCIDQ credentials to be verified before issuing state certification, as there is no guidance in the proposed rules clarifying if or how the Board will do so.** CIDQ offers an expedited means of confirming applicants' credentials, and therefore eligibility for the title, through access to our jurisdictional portal.

Rules Section 3(b)- Limit on Scope

We understand and agree with the intent of Section 3(b); however, the rules must account for the overlap between the professional scopes of architecture and interior design. Certified Interior Designers do not seek to practice architecture, engineering, or landscape architecture, and NCIDQ Certificate holders understand the limits of their professional scope and recognize

225 Reinekers Lane, Suite 210, Alexandria, VA 22314
202-721-0220

when coordination with another design professional is necessary. As presently written, however, the provision could prevent qualified interior design practitioners from performing services that might also be construed as falling within the state's broad definition of the practice of architecture, *even when those services fall within the definition contained in Section 54-306(c)(ii)*.

Certified Interior Designers should be permitted to perform services incidental to the practice of architecture when those services fall within the permitted scope outlined in HB 790, can be performed safely and competently without jeopardizing the public's health, safety, or welfare, and when the designer is qualified by education, experience, and examination to provide them. NCIDQ Certificate holders satisfy both standards. **Accordingly, this provision should be clarified to recognize the legitimate overlap in scope, allowing Certified Interior Designers to practice fully within the scope outlined in Section 52-306(8)(c)(ii), or alternatively, stricken in its entirety.**

Section 3(c)- Lapse in National Certification

We request verification of the correct section citation in this provision. Based on the subsection title, this provision appears intended to stipulate that if a Certified Interior Designer's NCIDQ certification lapses into inactive status, then that designer must discontinue use of his or her seal, which is consistent with the intent of HB 790. If that is the intent of this proposed rule, then perhaps the wording of this citation should reflect Section 54-306(8)(c)(i), the requirements for holding a "Certified Interior Designer" title. The current language of the proposed rule cites Section 54-306(8)(c)(ii), Idaho Code, which is the provision outlining the permitted scope of a Certified Interior Designer.

Thank you for the opportunity to comment and for considering these recommendations. We would welcome the opportunity to provide additional information or assist the Board as it develops rules to implement House Bill 790.

Sincerely,



Matthew R. Barusch, CAE
Director, Government Affairs and Advocacy
Council for Interior Design Qualification
mbarusch@cidq.org



HEADQUARTERS

111 E. Wacker Drive, Suite 222
Chicago, IL 60601 USA
888.799.IIDA (4432)
www.iida.org

Ryan Bernard
Legislative and Regulatory Affairs Chief
Idaho Board of Architects and Landscape Architects
11341 Chinden Blvd.
Boise, ID 83714

August 11, 2026

Dear Mr. Bernard,

My name is Cheryl Durst, and I am the Executive Vice President and Chief Executive Officer for the International Interior Design Association (IIDA). Thank you for the opportunity to comment on the proposed rules governing Certified Interior Designers, *24.01.01 -- Rules of the Board of Architects and Landscape Architects*

With more than 15,000 members, IIDA represents and supports design professionals, industry affiliates, educators, students, and firms across 58 countries. We advocate for the advancements in education, design excellence, legislation, leadership, and accreditation to increase the value and understanding of the profession of Interior Design, and its role in protecting public health, safety, and welfare. IIDA is also one of three organizations comprising the Consortium for Interior Design, which works to establish, maintain, and modernize interior design legislation that establishes independent practice rights for qualified interior designers.

Today, 31 states, plus D.C. and Puerto Rico, have legislation in place recognizing the profession of interior design. Several bills, including Idaho's HB 790, passed just this year, making it clear that decision-makers around the country are becoming increasingly aware of the impact that interior design has on the health, safety, and welfare of the public.

In Idaho, HB 790 will allow qualified interior designers to sign and seal technical submissions for a limited set of drawings and establish a voluntary certification for certified interior designers, to be administered by the Idaho Board of Architects and Landscape Architects. IIDA is aligned with the Consortium for Interior Design—Idaho's recommendations on the draft rule:

- Section 03, Certified Interior Designers (a), last sentence: The phrase "...and such other words or figures as the board may deem necessary and prescribe" is vague. We ask that the Board clarify what additional "words or figures" it may require.
- Section 03(a)(ii): We request that the Board remove the word "principal," as it is not referenced in HB 790. Its inclusion risks creating confusion around the Certified Interior Designer designation for both the Board and applicants.
- Section 03(b): We propose striking this section entirely or, at minimum, revising its title. As currently titled, the section implies it defines the scope of practice for certified interior designers — a scope already clearly established in HB 790.
- Section 400, Fees (03): We propose replacing the term "license" with "certification." Because the law establishes only a certification, not a license, this terminology should be used consistently throughout the rule.
- CEU Requirements: We propose adding a section addressing continuing education unit (CEU) requirements, as CEUs are already required for certified interior designers through CIDQ.
- The recommendation that the Board consider developing guidance documents to help professionals, including those pursuing the Certified Interior Designer designation and allied professionals, better understand the certification process, as well as to meet the qualifications set forth in the law.

Thank you for allowing this opportunity for feedback. If you have questions about IIDA's role in advancing the profession, please contact me directly.

Best wishes,

Cheryl Durst
Executive Vice President/CEO
The International Interior Design Association



August 11, 2026

Ryan Bernard
 Legislative and Regulatory Affairs Chief
 Idaho Board of Architects and Landscape Architects
 11341 W. Chinden Blvd.
 Boise, ID 83714

RE: 24.01.01- Rules of the Board of Architects and Landscape Architects

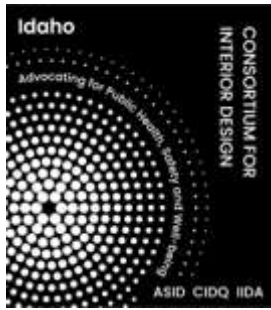
Dear Mr. Bernard:

On behalf of the Consortium for Interior Design–Idaho, we appreciate the opportunity to comment on the proposed rules governing Certified Interior Designers. The Consortium is proud to represent and serve as the voice for certified interior designers in Idaho, and we welcome this opportunity to provide additional feedback on the draft rule.

As you are aware, this rulemaking stems from the passage of HB 790. This law allows certified interior designers to sign and seal technical submissions for a limited set of drawings. It also establishes a voluntary certification for interior designers, to be administered by the Idaho Board of Architects and Landscape Architects and authorizes the Board to promulgate rules governing the administration of that certification.

After careful review of the draft rule, we offer the following comments:

- **Section 03, Certified Interior Designers (a), last sentence:** The phrase "...and such other words or figures as the board may deem necessary and prescribe" is vague. We ask that the Board clarify what additional "words or figures" it may require.
- **Section 03(a)(ii):** We request that the Board remove the word "principal," as it is not referenced in HB 790. Its inclusion risks creating confusion around the Certified Interior Designer designation for both the Board and applicants.
- **Section 03(b):** We propose striking this section entirely or, at minimum, revising its title. As currently titled, the section implies it defines the scope of practice for certified interior designers — a scope already clearly established in HB 790.



- **Section 400, Fees (03):** We propose replacing the term "license" with "certification." Because the law establishes only a certification, not a license, this terminology should be used consistently throughout the rule.
- **CEU Requirements:** We propose adding a section addressing continuing education unit (CEU) requirements, as CEUs are already required for certified interior designers through CIDQ.

Finally, as this is a new certification for the state, we recommend the Board consider developing guidance documents to help professionals — including those pursuing the Certified Interior Designer designation and allied professionals — better understand the certification process. In particular, we recommend guidance explaining how the Board will verify that an applicant meets the qualifications set forth in the law. We believe this will improve transparency and help ensure that applicants have all necessary documentation in order.

Thank you for taking the time to review our comments.

Idaho Consortium for Interior Design

Mae Myers, Katie Edwards & Adrienne Lane-Martin

From: Allison Fleury [REDACTED]
Sent: Thursday, August 13, 2026 10:05 AM
To: DOPL BCRC-Licensing <BCRE-Licensing@dopl.idaho.gov>
Subject: Rules change to include Interior Designers

CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Hello - I am so pleased to see our rules expanding to include certified interior designers. The chapter heading should also be revised to read Architects, Landscape Architects, and Interior Designers. Or if you want it alphabetical... Thank you!

Allison Fleury, PLA

Professional Landscape Architect , CLARB, ASLA

Inside Out Landscape Architecture, LLC





August 21, 2026

Ryan Bernard
Legislative and Regulatory Affairs Chief
Idaho Board of Architects and Landscape Architects
11341 W. Chinden Blvd.
Boise, ID 83714

RE: 24.01.01- Rules of the Board of Architects and Landscape Architects

Dear Mr. Bernard:

On behalf of the Consortium for Interior Design–Idaho, we appreciate the opportunity to comment on the proposed rules governing Certified Interior Designers. The Consortium is proud to represent and serve as the voice for certified interior designers in Idaho, and we welcome this opportunity to provide additional feedback on the draft rule.

In follow up to our previous comments dated August 11, 2026:

- **CEU Requirements:** We propose to remove our previous suggestion as we understand that the rulemaking should and already does reference CIDQ, the national organization who monitors CEU requirements for Certified Interior Designers.

Thank you for taking the time to review our comments.

Idaho Consortium for Interior Design

Mae Myers, Katie Edwards, Adrienne Lane-Martin