



**Statement of Laurie Gunzelman, AIA**  
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**Hearing before the House Economic Development, Commerce and Labor Committee**  
**On May 22, 2018, in opposition to sub H. B. 504 of the 132nd Ohio General Assembly**

Thank you, Chairman Young, Vice Chairman Riedel Ranking Member Lepore- Hagen and members of the House Economic Development, Commerce and Labor Committee.

My name is Laurie Gunzelman. I came to architecture later in life and started architecture school at the age of 29. I was a military officer's wife and became engaged in architecture while living overseas. I received my undergraduate and graduate degree from Ohio State University summa cum laude and with distinction. I have practiced architecture for over twenty years. I am a member of the American Institute of Architecture and own a small practice in Columbus, OH. My firm, GUNZELMAN architecture + interiors, provides professional architectural and interior services for residential, commercial and institutional clients. Our practice while small, employs one other registered architect besides myself, and two graduate architects who are on their way to becoming licensed architects in Ohio. Over half of the work we perform is strictly interior architecture and just a few years ago that number was closer to 90% when the economy was less vibrant then today and new construction was nonexistent. I am here to testify in opposition to House Bill 504, which is written to create licensure for Interior designers in our state.

HB 504 does not recognize the complex relationship between interior design, a single component of a building as a whole; a collection of many components, all of which must work together as a cohesive unit. As a practitioner working in this area of expertise of interior architecture, I can tell you that it's not so simple to define where architecture ends, and interior design begins.

This is important because there is a potential risk to public health, safety and welfare if interior designers, who are not trained and licensed to understand buildings in this holistic way, are authorized to stamp and sign technical drawings for permit. If an interior designer is not trained, licensed and insured to provide these services, they may not know what critical information is missing, or may neglect to consider.

- *EXAMPLE: There are many instances when developing an architectural solution for the interior "skin" of a building, that the architect is presented with proximate non-compliant systems or unforeseen conditions that require a solution in order to maintain safety to its occupants. For example, if our firm is requested to change a use of a space or requested to add a wall, the result may affect the egress, structural or mechanical component of an adjacent space. Without a clear understanding of all of the components that the Building Codes and its Reference Standards employ, the resulting design solutions may not entirely consider all that is required to create a space that is both safe and artistically designed.*

As you've heard, architects serve as not only the designer for a project, but also the team leader and project manager. One of our most important responsibilities is to review and test all aspects of the project for compliance with building and zoning codes. When we sign and seal a drawing set, our seal confirms that we have reviewed the work of all the disciplines with in the set, and that it complies with these codes. This may include civil engineers, landscape architects, structural engineers, mechanical, electrical, plumbing, as well as the drawings and specifications of any interior work which may include, furniture, finishes, equipment, signage and other non-licensed disciplines. This is all in addition to our own architectural drawings. Engineers that are licensed and seal their drawings still control their work product under the architect seal, as well as the architect's administration and management.



- *EXAMPLE: In several projects we have been retained to develop an interior renovation for the stator of Ohio. A portion of the Request for proposal asks for secondary disciplines including structural engineering, MEP engineering and interior designers. Each provided a valuable asset to the overall design solution of the project, but the architect's responsibility is to ensure the execution coordination, management of the design as well as how the design affects the health, safety and welfare of the project's occupants.*

Despite supporter's claims, interior designers are currently "allowed" to practice interior design under the Ohio Building Code. They are however, not allowed to provide services beyond their expertise or practice architecture without a license. This very fact is clearly outlined in Ohio revised Code Title 47 which outlines requirements for occupations in OH.

Our current building code clearly states what types of work require a permit, the process for obtaining the permit, and who is responsible for its execution. It also describes the process to ensure a compliant project. The Ohio Building Code, as it exists today, allows work without a permit for "finishes not regulated by this code, decorating, or other work defined as maintenance or minor repair." The Interior Finishes section of the code, Chapter 8, is 5 pages of an over 600-page manual which also references other disciplines such as the mechanical, electrical and plumbing codes as well as reference standards for areas related to accessibility and fire code. This demonstrates that it is nearly impossible to isolate a section from the building code and not address the other sections.

Under HB 504, what happens when the building department determines that one aspect of an interior designer's work extends to code chapters for which they are not responsible? What happens when there's an inevitable disagreement between an interior designer and a building official as to whether certain aspects of work extend beyond their authority?

- *EXAMPLE: Often times after submitting a set of drawings for review for permit, it is requested by the authorities having jurisdiction for the architect to provide additional information to the approving authorities. These requests may include Model Energy Codes, review of accessibility components such as clearance requirements or clear accessible routes or address adjacent areas that are deemed to be non-compliant due to fire ratings or inadequate fire alarm devices. There may be hazardous material or environmental engineering that may need to be performed to remove building toxins or in some cases the Fire Marshal may request added safety measures for a building use or construction type such as an area of refuge, two way communication or notification devices. The experience and working knowledge that the architect receives throughout their training and work experience provides an encyclopedia of knowledge to enable them to address these issues.*

In conclusion – Building projects are complex and, in order to protect public health, safety and welfare, responsible control of drawings needs to stay with individuals who is trained and licensed as outline in the Ohio revised Code Title 47 to understand the whole building and ensure compliance with the requirements of the entire code.

I would respectfully ask the members of this committee to not support HB 504 as it is currently written. Passing HB 504 will effectively allow interior designers to practice architecture without a license since it enables them to stamp and submit drawings for permit without full knowledge of all of the components of a cohesive building. Thank you again Chairman Young and members of the committee for allowing me to testify on HB 504. I would be happy to answer any questions from the committee.