



**Statement of Timothy Hawk, FAIA
Architect
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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**

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Thank you, Mr. Chairman Young, Vice Chairman Riedel, Ranking Member Lepore-Hagen and members of the House Economic Development, Commerce and Labor Committee. My name is Timothy Hawk.

I am a member of the American Institute of Architects (AIA) national governance which represents over 91,000 members across the country as well as the past chair of the AIA National Interior Architecture Committee. I am also a past president of AIA Columbus and founder of the Columbus Center for Architecture and Design. I received both a Bachelor of Science in Architecture and a Master of Architecture from the Knowlton School of Architecture at the Ohio State University. For twenty-five years, I have been a principal and have managed WSA Studio, a 23-person Gold Medal architecture and design firm in Columbus, which employs interior designers on staff.

I am here to testify in opposition to House Bill 504 as it is currently written. As a licensed architect who owns an architectural firm with a focus on interior architecture, and as a national leader in this arena, the language in this bill is problematic because it is nearly impossible to carve out the interior of the building and separate it from the rest of the building. All of the many, complex systems that exist in a building are interwoven, and the architect is the responsible professional who takes comprehensive responsibility. It is simply not possible to isolate a portion of a building as if one aspect doesn't impact everything else and can be safely considered independent of all other elements.

- *As an example, when one designs a typical interior office environment, the impact of furniture and equipment on the structure of the building is a consideration. If the client needs to accommodate large amounts of files for storage, this may require structural augmentation. Every building is designed to support a limited live load, and knowledge of structural systems is necessary for each project.*
- *When an interior wall or partition is specified, the fire rating needs to be considered to ensure that the plan meets life safety requirements. Item 2g of Sec 4703.60 C of the bill indicates that "all aspects of an interior life safety plan" are excluded from the practice of interior design. I cannot think of a project which requires a building permit that does not impact life safety of the occupants.*

Architects are responsible for overseeing and managing a project in totality ensuring that all aspects of the final drawings comply with building codes, zoning

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codes and other applicable standards in to protect the occupants of the building from harm in the event of an emergency.

In my professional capacity as an architect and business owner, I work closely with the interior designers on my staff. I understand and value the contribution each of these individuals make to the success of our projects and our office.

- *Interior designers focus on how individuals will use interior space and augment designs by considering details which may increase human comfort and the overall aesthetic of the design. My firm has benefitted from hiring NCIDQ certified interior designers with degrees from CIDR accredited schools in Ohio and consider these credentials to be a distinguishing characteristic among candidates.*
- *We consider interior designers to be a key and integral part of our project teams and these professionals work alongside our architectural staff. The architects focus on the comprehensive design of the interior and the integration of interior elements with the mechanical, electrical, and structural systems and are responsible for the health, safety, and welfare of the occupants. Interior designers discern client needs, support design planning and conceptualization, and select furniture to elevate the architectural idea.*

The state of Ohio has clearly defined the practice of architecture and outlines the scope of services a licensed architect may provide. The proposed scope of services a certified interior designer may provide under HB 504 substantially overlaps the scope of services of an architect. I am concerned that this bill will inadvertently allow interior designers to provide architecture services and relegate architects to the design of building shells, only. The bill's definition mischaracterizes the role of an architect. Architects do more than simply design the exterior of a building, as I referenced in my prior examples.

For reference purposes:

a) p.7 line 192-197

"Practice of interior design" means the preparation of a plan or specifications for, or the supervision of, the new construction, alteration, or repair of an interior space, as defined by the Ohio interior design examiners board in rule, within a building when the exterior elements of the building are not going to be changed.

The statutory definition of the practice of architecture (OAC 4703-1-01(b) clearly outlines a scope of services that an individual may provide if they are qualified to be an architect.

The "practice of architecture" is providing or offering to provide the following services in connection with the:

- *design and construction*
- *enlargement*
- *alteration of a building or group of buildings; and*
- *the space within and the site surrounding such buildings*

Whose principal purpose is the following:

- *human occupancy or habitation*
- *except where otherwise exempted by sections [3781.06](#) to [3781.18](#) and [3791.04](#) of the Revised Code.*

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The services referred to include:

- *pre-design*
- *programming*
- *planning*
- *providing designs, drawings, specifications and other technical submissions*
- *the administration of construction contracts; and*
- *the coordination of any elements of technical submissions prepared by others including, as appropriate and without limitation consulting engineers*

It is my belief that, while all design team members are and rightly will continue to be valued contributors, a single entity, namely the architect, who possesses comprehensive knowledge of current codes, materials, and practices as they relate and interact with each part of a building, must maintain responsible control for all aspects of a project in order to ensure the public and client are adequately protected.

In conclusion – Building design and construction is a complex, team sport. Architects aren't just the designers of the building. We guide a project along, managing the work of our consultants, bringing together all types of information and ensuring the final product complies with applicable codes.

Interior designers are a valued part of our design team, but there is no clear way to say “this is only interior design” and “this is only architecture”. Building design and construction is complicated and requires evaluation in totality. Only architects are adequately trained to provide this service.

Passing HB 504 will effectively allow interior designers to practice architecture without a license. I would respectfully ask the members of this committee to not support HB 504 as it is currently written for the reasons mentioned above.

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 the committee may have.

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