

May 11, 2017

Co-Chair Richard Devlin  
Joint Committee on Ways and Means  
900 Court Street, NE  
S-213  
Salem, Oregon 97301

Co-Chair Nancy Nathanson  
Joint Committee on Ways and Means  
900 Court Street, NE  
H-276  
Salem, Oregon 97301

Dear Co-Chairs Devlin and Nathanson:

On behalf of the National Society of Professional Engineers (NSPE) and the Professional Engineers of Oregon (PEO), we urge the Joint Committee on Ways and Means to oppose HB 2153, which would enable commercial interior designers who have completed a voluntary certification program to engage in the licensed practice of engineering.

ORS 672.020 specifies who can practice engineering in Oregon, stating that “to safeguard life, health and property, no person shall practice or offer to practice engineering in this state unless the person is registered and has a valid certificate to practice engineering issued under ORS 672.002 to 672.325,” and also, “[e]very final document including drawings, specifications, designs, reports, narratives, maps and plans issued by a registrant shall be stamped with the seal and signed by the registrant.”

ORS 672.098 explains: “As minimum evidence of qualification for registration as a professional engineer, an applicant must:

- (1) Except as provided in ORS 672.146, provide evidence of graduation in a college or university engineering program of four years or more approved by the State Board of Examiners for Engineering and Land Surveying;
- (2) Except as provided in ORS 672.103, pass, or provide evidence of having previously passed, a fundamentals of engineering examination approved by the board;
- (3) pass, or provide evidence of having previously passed, a practical engineer’s examination approved by the board;
- (4) have a work record of four years or more of active practice in engineering work satisfactory to the board; and
- (5) meet any additional requirements for registration as a professional engineer adopted by the board under ORS 672.255.”

If passed, HB 2153 would allow a certified commercial interior designer to engage in engineering responsibilities that, as a matter of law, can only be performed by a professional engineer. For example, Section 2(1) of the bill states:

- (1) A commercial interior designer certified under section 1 of this 2017 Act is qualified for purposes of any municipal building inspection program under ORS 455.148 or 455.150, or a building inspection program administered and enforced by the Department of Consumer and Business Services, to submit plans, drawings, designs and specifications:
  - (a) Regarding architecture or engineering work that the designer has prepared as an employee of a registered architect or registered professional engineer;
  - (b) Drafted or otherwise prepared by the designer under the instruction, control or supervision of an employing registered architect or registered professional engineer;

While NSPE and PEO are encouraged that the Oregon legislature recognizes the clear need that such work be under the instruction, control or supervision of an employing registered architect or registered professional engineer, NSPE and PEO are concerned that a certified interior designer does not have the basic education necessary for the work proposed to be performed given such certification can be obtained by an individual who has not graduated from an engineering program, which is a basic requirement for training in the practice of engineering according to ORS 672.146.

The professional engineering licensure process, and the verification process by the State Board of Examiners for Engineering and Land Surveying of those deemed to meet the basic education and testing requirements to train in the practice of engineering, demonstrates an engineer's qualifications and commitment to the highest standards of engineering practice. We urge you to oppose HB 2153 and any legislation that exempts professional engineering licensure for the practice of engineering as defined by the State of Oregon.

Thank you for this opportunity to provide comment. If we can answer any questions or respond to any comments, please contact Arielle Eiser, senior manager of government relations, at [aeiser@nspe.org](mailto:aeiser@nspe.org).

Sincerely,



Kodi Jean Verhalen, P.E., Esq., F.NSPE  
President, 2016-17  
National Society of  
Professional Engineers

*Matthew J. Cash* /s/  
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President, 2016-17  
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