



**EXAMINING THE CALIFORNIA  
EXAMINATION ISSUE**

**POSITION PAPER FOR CALIFORNIA  
CERTIFIED INTERIOR DESIGNERS**

**JULY 2006**

# EXAMINING THE CALIFORNIA EXAMINATION ISSUE

## Who sets the standards for examinations in California?

Section 139 of the California Business and Professions Codes mandates the Department of Consumer Affairs (DCA) to establish a policy regarding examinations used by all boards under its direction.

The policy was developed and written by the Office of Examination Resources, a department under the control of the DCA, and became effective September 30, 1999.

This policy is contained within a 24-page booklet and is very comprehensive in its requirements for examinations.

The CCIDC board has been directed by the California legislature to ensure that the examinations it uses to certify interior designers in California conform to this policy.

Some important excerpts from this policy:

***“For some boards, programs, bureaus, and divisions, the best choice for examination programs is the use of national examinations that are provided by testing vendors. While it is recognized that the boards, programs, bureaus, and divisions have the final responsibility for its examination programs, the testing vendor should apply the standards identified within this policy to ensure that the examination programs comply with California requirements.”*** (Examination Validation Policy, Preamble - Page 1, 3<sup>rd</sup> Paragraph)

This excerpt clearly gives the CCIDC board the responsibility for choosing the examinations it wishes to use, and clearly requests that the testing vendors (CQRID, NCIDQ, NKBA) apply these standards to their examinations in order to comply with California requirements.

***“SETTING OF PASSING STANDARDS – Every board, program, bureau, and division under the jurisdiction of the DCA should ensure that the passing standards for its examination(s) are based upon minimum competency criteria at an entry level to the profession.”*** (Examination Validation Policy – Page 6)

Entry Level is defined as:

***“The perspective that the content of test should be based on the level of competency required of a practitioner who has been licensed for less than five (5) years.”*** (Examination Validation Policy, Glossary of Terms – Page 11)

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Minimum Competence is defined as:

***“The level of knowledge, skills and abilities required of practitioners that when performed at this level would not cause harm to the public health, safety and welfare.”*** (Examination Validation Policy, Glossary of Terms – Page 11)

**Who decides which examinations will be used in California?**

The CCIDC board of directors has the sole responsibility for determining which examinations it will, or will not, accept for certification, just like all the state boards. No one else makes this decision.

**Who does CCIDC report to?**

The CCIDC board reports to the **Joint Committee on Boards, Commissions & Consumer Protection** (JCBCCP) as required by California law. The following has been taken from the JCBCCP web site and is the criteria that the JCBCCP will use to examine CCIDC’s programs and effectiveness. Highlighted in bold italics are two specific items relevant to this discussion on examinations.

**GOALS AND OBJECTIVES OF THE  
JOINT COMMITTEE ON BOARDS, COMMISSIONS &  
CONSUMER PROTECTION**

**Primary Goal and Purpose of Joint Committee on Boards, Commissions & Consumer Protection:**

The primary goal of the Joint Committee is to systematically examine and evaluate all boards and commissions

**Other Goals Include:**

- Eliminate unneeded, nonfunctional, or redundant boards or programs, or any unnecessary rules and regulations.
- Improve the quality of services provided to the consumer by examining the boards requirements for education, experience and testing of professionals, and other actions taken to assure competency.

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- *For licensing boards, eliminate overly restrictive eligibility standards, or standards of practice, which unduly limits competition between professionals, or places undue burdens on those who want to enter the occupation.*
- Ensure that the public knows where they can go if injured or harmed by a licensed (or unlicensed) person, what actions they can take, and what the outcomes may be.
- Ensure that the public's complaints are handled in a courteous and expeditious manner.
- Ensure that boards are providing the appropriate remedy for the consumer: mediation, arbitration, restitution, disciplinary action, and/or criminal action against the licensee or person posing as a licensee.
- Ensure the public is informed about any complaints, disciplinary actions, judgments and criminal actions against a licensed professional.
- And in the future, with information technology advancements, provide better and more uniform information on licensed professionals as to education, experience, prior employment, or any other relevant information considered necessary for the consumer to make informed decisions about using the services of particular professionals.

**In Pursuing These Goals, The Joint Committee Has As The Following Objectives To:**

- Determine if the membership of the board adequately represents both consumer interests and the licensing population, and whether the board encourages public participation in its decision making.
- Examine the boards organization and management and recommend elimination, consolidation and reorganization of programs where appropriate.
- Identify opportunities for improvements in the management of the boards daily operations, and for providing more efficient and effective consumer services.
- Identify consumer concerns and those of the regulated profession regarding the way the board operates.
- Establish appropriate performance measures for each board reviewed.

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- Evaluate the boards programs and policies to identify overlapping functions and outmoded methodologies.
- *Determine whether the board’s licensing, examination and enforcement programs are administered so as to protect the public, or if they are instead self-serving to the profession, industry, or individuals being regulated by the board.*
- Review the laws and regulations pertaining to the board and determine whether they restrict competition in the marketplace, the extent to which they are still necessary to regulate the profession, and whether the board is carrying out its legal mandate or has exceeded their authority.
- Examine the boards fiscal management practices and financial relationships with other agencies.
- Examine workforce issues.

Identify advances in information technology applicable to the board’s functions.

It can clearly be ascertained by these two highlighted items that the JCBCCP will focus on the CCIDC board’s use of examinations and their compliance with the state standards as defined in the DCA’s Examination Validation Policy. Although the CCIDC is not a state licensing board, it is required to follow the same standards and directives as state licensing boards.

**What is the law with regards to eligibility for CID’s in California?**

Certified Interior Designers are covered by Section 5800 of the California Business and Professions Code. Since 1992 the CCIDC has been the qualifying “interior design organization” representing CID’s under this law. The specific portion of the law that refers to who is qualified to become a CID is as follows:

*5801. A certified interior designer may obtain a stamp from an interior design organization which shall include a number which uniquely identifies and bears the name of that certified interior designer. The stamp certifies that the interior designer has provided the interior design organization with evidence of passage of an interior design examination approved by that interior design organization and any of the following:*

*(a) He or she is a graduate of a four or five-year accredited interior design degree program, and has two years of diversified interior design experience;*

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*(b) He or she has completed a three-year accredited interior design certificate program, and has completed three years of diversified interior design experience;*

*(c) He or she has completed a two-year accredited interior design certificate program, and has completed four years of diversified interior design experience;*

*(d) He or she has a combination of interior design education and diversified interior design experience that together total at least eight years.*

These requirements, education and experience (a, b, c, & d) are written into law. Item (d) is clearly included for “experience only” applicants so as not to create a barrier to entry to the profession, especially those wishing to become CID’s who have been practicing before the certification program was put in place in California, and before suitable education programs were available.

**Do all the examinations used for CID’s meet California law?**

The simple answer is yes and no! All examinations used by the CCIDC board meet items (a), (b), and (c) of Section 5801 above. Only the CQRID and NKBA examinations meet item (d).

The experience only (d) requirement is **NOT** met by the NCIDQ examination; therefore they are not fully compliant with the letter of the law. The experience requirement is met by both the NKBA (7 years) and the CQRID (8 years). Exams that do not comply with the law can be considered "barriers to entry to the profession" which is diametrically opposed to the goals and objectives of the CCIDC board's oversight committee, the JCBCCP (formerly the JLSRC).

**What do other boards do in California with respect to examinations?**

One of the most common examples cited by those opposed to multiple examinations for the same profession is that of Registered Architects. All architects in order to become registered have to take and pass the national “Architects Registration Examination” (ARE) amongst other requirements. The ARE is administered by the National Council of Architectural Registration Board’s (NCARB).

After reviewing NCARB's web site that said it was the determination of each individual state architects board as to who would be eligible to take the ARE, the following was taken from the California Architects Board (CAB) web site (<http://www.cab.ca.gov/instruction-are.htm>).

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***Requirements and Instructions for Filing  
Applications for Eligibility Evaluation for the  
Architect Registration Examination***

***The California Architects Board (CAB) establishes eligibility requirements for examination and licensure for architects in the state of California. To become licensed as an architect in California, a candidate must provide verification of 8 years of education and/or work experience and must successfully complete the Architect Registration Examination (ARE) and the California Supplemental Examination (CSE). A candidate must verify five years of education and/or work experience to be eligible for the ARE, and eight years for the CSE and licensure.***

Under Section 139 of the B&P code which covers the policy for examinations used by the State of California, the DCA policy (Examination Validation Policy, Page 6 - Setting of Passing Standards) describes "***minimum competency at an entry level to the profession***" as the passing standard for any examination for any board under the jurisdiction of the DCA, and defines "***entry level***" (Examination Validation Policy, Page 11 - Glossary of Terms) as the "***level of competency required of a practitioner who has been licensed for less than five (5) years.***" It appears CAB complies with this policy.

To show that this is not an isolated example, another profession to look at is that of Attorneys. The following are the requirements for applying to take the Bar examination and can be found at the State Bar web site (see below for the URL). The following are their requirements:

***Legal Education***

***Pursuant to Rule VII, Section 2 of the Rules Regulating Admission to Practice Law in California, in order to establish eligibility every general applicant must have***

**(a) Graduated from a law school approved by the American Bar Association or accredited by Committee of Bar Examiners; or**

**(b) Completed at least four years of law study in any of the following manners**

***1. In a law school that is authorized by the State of California to confer professional degrees; is registered with the Committee of Bar Examiners; and which requires classroom attendance of its students for a minimum of 270 hours a year; or***

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*2. In a law office in the State of California and under the personal supervision of an active member of the State Bar of California for at least five years; or*

*3. In the chambers and under the personal supervision of a judge of a court of record of this state; or*

*4. In a correspondence law school registered with the Committee of Bar Examiners, and requires no less than 864 hours of preparation and study per year; or*

*5. By any combination of the methods referred to in this subsection (b).*

This can be verified at (<http://calbar.xap.com/applications/CalBar/info/legal.html>).

In reading number 2 and 3 above, it appears again that there is a provision for experience only candidates, and number 2 specifically cites the five (5) year minimum competency at entry-level requirement.

Many of the state boards do require some form of mandatory education as well as the required exam(s). Whether or not that education is required prior to taking the exam or not depends upon the registration requirements for that particular examination.

### **Why does CCIDC use multiple examinations?**

CCIDC will accept all exams that qualify interior designers in California, whether they are residential or commercial, regardless of the designers chosen specialty. If you practice interior design in any field, the CCIDC board wants all interior designers to be certified, so they can be regulated and consumers can be encouraged to only hire CID's. This is the only way certification can work in this state - by protecting consumers. It is no different than educating consumers to only hire licensed contractors, other than interior design certification is voluntary, and licensing contractors is mandatory.

### **Summary**

The examination argument is simple. The legislature is not going to change the law, or the DCA Examination Validation Policy, to make it more restrictive for Californians to enter a profession by eliminating the “experience only” aspects of said policy. Most, if not all, state boards already embrace the “experience only” aspect of being allowed to register for examinations, and to contemplate such a change would have far reaching effects that would trickle down through all the dimensions of the California professional structure and economy.

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Here are the facts:

The NCIDQ examination in its present form does not conform to California law. The certification law in California clearly states in Section 5801.d. that anyone who "has a combination of interior design education and diversified interior design experience that together total at least eight years" can become a certified interior designer. The NCIDQ requires a minimum of 2 years of interior design education, plus 4 years experience, in order to register for their examination. Both the CQRID (8 years) and the NKBA (7 years) allow experience only candidates to take their examinations. Both examinations are in compliance with California law, the NCIDQ examination isn't.

The NCIDQ examination does not meet "minimum competency at entry level" which is the standard the State of California uses for all examinations as stated by the DCA Examination Validation Policy prepared by the Office of Examination Resources), directed by Section 139 of the B&P Code. Minimum competency at entry level is stated simply as 5 years experience as a licensed person. No education, just experience and in most cases under a suitably licensed professional. This is the case for lawyers taking the bar exam and the same for architects taking the ARE. This policy was co-authored by, and the authoring committee chaired by, Norman Hertz, Ph.D. the person ASID hired from Sacramento to write a report about all three exams that the CCIDC board accepts. He failed to mention this important fact in his report to ASID - that the NCIDQ did not meet minimum competency as defined by the policy he wrote.

Exams in California will probably never be codified into law because the state has stated it does not do this for the reason that every time an examination is changed, goes out of business, or whatever, the law has to be changed. They also deem it the responsibility of the board to determine what exams are used because these are the "experts" overseeing that particular profession.

All exams used in California need to conform to the law as stated above, however if they do not it is the board's decision whether to continue to use them or not. For the moment the CCIDC board has determined to continue to accept the NCIDQ, as well as the other two exams. This could possibly change in the future, especially if the JCBCCP frowns upon examinations that do not comply with the law. The directive may come from above, even though it is the CCIDC board's decision. The CCIDC board answers to the state. It is important for the NCIDQ to fall into line with the other examinations and offer the ability to register to those with experience only as stated in Section 5801.d.

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It is interesting to note that a brand new graduate from a law school can sit for the bar exam in California as soon as they graduate, see item (a) under Legal Education above. Interior design graduates can't sit for any of the national exams, only the California Codes and Regulations Examination (CCRE) right out of school, or even while they are in school.

For all of the national interior design exams to comply with California law they should all allow those with 5 years of interior design experience under a "qualified" interior designer, (qualified being perhaps one who has already taken and passed that particular examination and have been practicing for a minimum of 5 years), to register and sit for that exam.

Why impose overly restrictive entry requirements if the exam has been properly prepared using qualified psychometrician's with a valid occupational analysis? Given these requirements only those who have the experience, and or education, or a combination of both, theoretically should be able to pass the exam. Those that don't will fail.

It doesn't make sense to make people wait in order to take the exam. They are fresh out of school and in the studying mode and therefore are probably best prepared to take and pass the test. This doesn't confer the CID status or any other status on them, they still have to meet all the "state" requirements, which include various combinations of education and experience before they get that title.

The way the national tests are set up, and the NCIDQ in particular, potential barriers to entry to the profession can be seen. This is what the state of California opposes. Please read the JCBCCP goals and objectives. If the architects and the attorneys can accept 5 years of working experience under a qualified professional as the minimum to sit for an exam, then so can the interior design profession. Until everyone accepts this premise it is going to be extremely difficult to convince the California legislature to limit certification to one exam that doesn't meet state standards.

At some point in the future it may be incumbent upon the CCIDC board to adopt a position that the CCRE be the only examination in California for certification with a primary focus on consumer protection and the 5-year experience component under a "qualified" practitioner, which will have to be defined. Hopefully before then, the various examination administrators, interior design professional organizations, and legislative coalitions can get together and work as one so that eventually a cohesive plan be put forward to the legislature with the goal of strengthening the current laws in order to protect consumers more than we are able to do now. This is after all the primary goal of any professional regulatory program.

## NCIDQ NATIONAL EXAMINATION STATISTICS

<b>6 PART EXAMINATION</b>					
<b>Examination Date</b>	<b>Total Number of Examination Candidates</b>	<b>Total Number Who Sat All Parts of Exam at Once</b>	<b>Total Number Who Passed All of Exam at Once</b>	<b>Total Number Who Became NCIDQ Certified</b>	<b>Cost of Examination</b>
April 1996	1,451	285	23 (8%)	208 (14%)	\$450.00
October 1996	1,636	329	35 (11%)	252 (16%)	\$450.00
April 1997	1,679	317	48 (13%)	264 (16%)	\$450.00
October 1997	1,735	430	68 (16%)	424 (25%)	\$450.00
April 1998	1,642	317	24 (8%)	273 (17%)	\$495.00
October 1998	1,714	347	30 (9%)	252 (15%)	\$495.00
April 1999	1,662	305	52 (17%)	350 (21%)	\$495.00
October 1999	1,600	379	14 (4%)	233 (15%)	\$495.00
April 2000	NO EXAM				
<b>3 PART EXAMINATION</b>					
<b>Examination Date</b>	<b>Total Number of Examination Candidates</b>	<b>Total Number Who Sat All Parts of Exam at Once</b>	<b>Total Number Who Passed All of Exam at Once</b>	<b>Total Number Who Became NCIDQ Certified</b>	<b>Cost of Examination</b>
October 2000	1,610	453	280 (62%)	582 (36%)	\$495.00 to \$595.00
April 2001		359	205 (57%)		\$595.00 to \$665.00
October 2001	*High 1,153 *Low 766	470	247 (53%)		\$595.00 to \$665.00
April 2002	*High 1,103 *Low 759	434	234 (54%)		\$625.00 to \$705.00
October 2002	*High 1,097 *Low 781	489	290 (59%)		\$625.00 to \$705.00
April 2003	*High 1,134 *Low 762	491	304 (62%)		\$650.00 to \$740.00
October 2003	*High 1,213 *Low 785	495	271 (55%)		\$650.00 to \$740.00
April 2004	*High 1,177 *Low 752	472	249 (53%)		\$675.00 to \$775.00
October 2004	*High 1,151 *Low 752	545	290 (53%)		\$675.00 to \$775.00
April 2005	*High 1,298 *Low 825	543	279 (51%)		\$695.00 to \$805.00
October 2005	*High 918 *Low 806	567	251 (44%)		\$840.00 to \$1,005.00

\*Actual number of candidates taking exam were not available, however “total sitting all three parts at once” was available, plus how many individual candidates were taking each individual section, so a “High/Low” number was computed based upon these numbers.

**Source of information: NCIDQ**