



March 28, 2025

The Honorable Robert E. Craven  
Chair of RI House Judiciary Committee  
82 Smith Street  
Providence, RI 02903

Dear Chairman Craven:

I was not able to attend your hearing of March 18<sup>th</sup>, where we would have proposed several key amendments to the mandatory rental registry law to ensure clarity, fairness, and practicality in its implementation.

First, we recommend **limiting the mandatory rental registry to properties constructed prior to 1978**. The Consumer Product Safety Commission banned lead-based paint in 1978, and federal and state laws already exempt post-1978 buildings from lead disclosure requirements to prevent confusion. For consistency, we propose removing post-1978 buildings from the registry.

Second, we propose **removing the restriction that prevents a landlord from evicting a tenant for nonpayment of rent if the property has not been registered and inspected**. This provision creates significant financial and operational challenges:

- If rent goes unpaid, landlords may struggle to maintain the property, cover mortgages, and address necessary repairs, potentially leading to foreclosure.
- The current shortage of lead inspectors means landlords may be waiting months for an appointment, during which tenants could withhold rent without fear of eviction—even if the property is safe.
- This creates an unfair burden on landlords and could negatively impact housing stability.

Third, we recommend **changes to the public information requirements for safety reasons**. Given increasing concerns about harassment and personal security, we propose that certain personal details be collected but not displayed on the public registry, including:

- The landlord's home address, business address, PO Box, email address, and personal phone number.

However, the following information would remain publicly accessible:

- The name of the landlord or business entity.
- The property manager's or agent's contact details, including business address, email, and phone number.

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- Information necessary to identify each dwelling unit.

Additionally, we propose **pushing the effective date of the registry requirement to September 1, 2025**, allowing landlords adequate time to adjust. We also recommend delaying penalty assessments until **October 1, 2025**, providing a 30-day grace period for compliance once the registry is operational.

These changes align the law with existing federal and state policies, protect both landlords and tenants, and ensure a fair and practical approach to rental property oversight.

Thank you for your time and consideration. I welcome any questions. I can be reached at 401-206-8907.

Sincerely,

*Stephen Perrino*

Stephen Perrino, REALTOR®, Paiva Realty Group, East, Providence, RI  
Chair, REALTOR® Party Committee, Greater Providence Board of REALTORS®

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