



State of Rhode Island

Department of State | Office of the Secretary of State

Gregg M. Amore, Secretary of State

March 31, 2026

The Honorable Evan P. Shanley, Chair
House Committee on State Government & Elections

RE: In support of H8297 – An Act Relating to State Affairs and Government – Administrative Procedures

Dear Chair Shanley,

I write this letter in support of House Bill 8297, legislation introduced at the Department of State's request, which would amend the refiling process for rules and regulations under the Administrative Procedures Act by simplifying it to an electronic attestation confirming that an agency's rules and regulations remain active and effective.

As Secretary of State, my top priority has been making government more accessible and transparent for all Rhode Islanders, thereby supporting civic engagement. The State Archives and Public Records Administration is an indispensable tool for upholding transparency in government—it safeguards Rhode Island's historical assets and records, both permanent and temporary, which document daily government operations.

The Public Records Administration maintains and oversees the Rhode Island Code of Regulations (RICR) Filing System as required in R.I. Gen. Laws § 42-35-4. The RICR Filing System allows an agency to choose the filing type and action to ensure rulemaking, such as Emergency Rules (R.I. Gen. Laws § 42-35-2.10) and Direct Final Rules (R.I. Gen. Laws § 42-35-2.11), are correctly filed and fulfill all statutory requirements. For all rules that require a Public Comment Period (R.I. Gen. Laws § 42-35-2.8(a)), the RICR Filing System automatically generates the Notice of Proposed Rulemaking (R.I. Gen. Laws § 42-35.2.7) to prevent undue burden for agencies to quickly and efficiently file rules with the Department of State.

With this bill, we intend to cut hours of unnecessary and burdensome administrative work for State agencies and our staff by streamlining the rule refile process into an electronic attestation, so agencies no longer have to file and process each rule individually through the RICR. With the advent of online archival infrastructure such as the RICR, the rule-refiling process no longer serves the purpose it did in the early 2000s, when the original statute was passed, and digitization was just beginning. In addition, the rule-refiling process creates public confusion, as the refile process mirrors the promulgation of a new rule. This would cause members of the public to believe that changes were made to an agency's rules, which is not the case at all during this process, as the previous promulgation's exact rule text is used for the newly promulgated refiled rule.

Overall, I urge this Committee and the full House to support House Bill 8297, as this legislation will substantially reduce the administrative burden on agencies and our office in fulfilling statutory requirements by streamlining the refile compliance process. Thank you for your consideration. If you have any questions, please feel free to contact Michelle Arias, Director of Intergovernmental Affairs, at marias@sos.ri.gov.

Sincerely,

Gregg M. Amore
Secretary of State

cc: The Honorable Members of the House Committee on State Government & Elections
The Honorable Earl A. Read, III

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