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**Testimony on S-2518**

**Rhode Island Senate Committee on Commerce**

By:

**Anne L. Fontaine, AIA**  
**Chapter President**  
and  
**Taylor Hughes, AIA**  
**Chapter Vice President**

On behalf of:

**AIA Rhode Island**

**A Chapter of**  
**THE AMERICAN INSTITUTE OF ARCHITECTS**

**March 10, 2026**

*AIA Rhode Island advocates for the role of architecture and architects,  
in elevating the quality of the built environment for all.*



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**Testimony in Opposition to S-2518 – “State of Rhode Island Interior Design Practice Act”**  
**Senate Committee on Commerce**  
**Hearing Date: March 10, 2026**

Chair Senator Robert Britto,  
Vice Chair Senator V. Susan Sosnowski, and  
Honorable Members of the Committee:

On behalf of **The American Institute of Architects Rhode Island (AIA Rhode Island)**, we thank you for the opportunity to comment on **Senate Bill 2518**. The American Institute of Architects is the voice of the architectural profession and a resource for its members in service to society. AIA Rhode Island represents over 330 dues-paying members. To determine how our members feel about this proposed legislation, the AIA Rhode Island Advocacy Committee surveyed our members and non-member architects and architectural professionals in the state of Rhode Island. This testimony reflects the majority opinion of those survey respondents.

**S-2518 would allow a newly regulated profession to independently prepare and take responsibility for certain interior construction documents within life-safety regulated building environments.** We respectfully submit testimony **in opposition** to this legislation.

AIA Rhode Island values and collaborates closely with interior designers, who are respected partners in creating high quality, beautiful, functional interior environments. Our opposition to S-2518 is **not** a reflection on the professionalism or expertise of interior designers. Rather, our concerns focus on **public protection** and on preventing **overlapping authority that creates confusion** for the public, code officials, and the design and construction industry.

**1. S-2518 blurs the line between interior design and the practice of architecture, creating conflict with established scope of architectural practice.**

S-2518 declares interior design to be a practice affecting “public health, safety, and welfare” and establishes a regulatory board to oversee the “professional practice of registered interior design”. The proposal defines a wide range of activities within that practice, including planning and documentation of interior construction and nonstructural alterations.

Although the bill appears to limit interior designers from altering structural, mechanical, electrical, or other life safety systems, its broad framing of “interior construction” and “health, safety, and welfare” responsibilities creates statutory language that overlaps with the scope of practice held by **licensed architects**, who are trained, examined, and regulated specifically for these responsibilities under state law.



Architects are licensed precisely because building design—even interior modification—has direct and substantial implications for fire protection, life safety systems, accessibility, egress, and code compliance. Confusion about who is authorized to take responsibility for these elements will compromise the safeguards the state has built into its current licensure laws.

## **2. The bill risks confusion among the public, clients, and building officials.**

By creating a new category of “registered interior designers” with an official board and regulatory authority, S-2518 may unintentionally signal to the public that interior designers have expanded authority similar to architects.

The bill proposes that interior design become a professional practice directly tied to the protection of health, safety, and welfare. This language, paired with new state registration, could easily lead to:

- Building owners to assume they may hire a registered interior designer when an architect is legally required.
- Interior designers to assume they may prepare documents beyond the nonstructural interior scope allowed.
- Building officials to face new ambiguity in determining when an architect’s stamp is required for permit submission.

The result could be increased administrative burden for building inspectors and inconsistent statewide enforcement.

## **3. Regulation in this form will create parallel authority over the practice of architecture, the purview of architects.**

S-2518 would establish a new interior design board with authority to regulate professional practice and enforce rules within this newly defined profession. This structure will create **dual oversight** over elements of building design that are already governed by architecture licensure laws, and the RI Board of Examination and Registration of Architects.

Even when interior alterations do not modify structural scope, they commonly affect:

- means of egress
- fire separation and compartmentalization
- HVAC distribution, lighting, and controls
- occupancy loads and resulting plumbing fixture requirements
- energy code compliance

As an example, **interior alterations in offices, hospitals, schools, and restaurants routinely affect egress paths, fire ratings, accessibility, and energy compliance.** These are **architectural responsibilities** that require training in building systems, building science, and integrated health and safety considerations—areas covered extensively in architectural education, internship, and the Architect Registration Examination (ARE). The NCIDQ examination focuses on interior

environments and does not evaluate the full range of building systems responsibilities required of licensed architects.

#### **4. Respect for interior designers and a call for clearer delineation of professional roles.**

Interior designers already practice successfully in Rhode Island today without state registration, collaborating closely with architects and engineers. Interior designers are deeply valued collaborators with architects. Their expertise in materials, furnishings, spatial experience, and user-centered environments is essential to many architects for successful projects. Many interior designers already work seamlessly with architects in Rhode Island, and AIA Rhode Island supports their continued professional growth and recognition.

Our concern is not with recognition—but with **public clarity**. AIA Rhode Island encourages legislative efforts that raise standards across the design professions, but those efforts must also **preserve clear distinctions** between professionals charged with safeguarding the structural, technical, and regulatory aspects of buildings.

S-2518, as written, risks obscuring these distinctions at the expense of the public’s understanding of who is licensed—and legally accountable—for protecting their safety.

#### **Conclusion**

AIA Rhode Island respectfully opposes S-2518 because, despite positive intentions, it would:

- Blur the scope of practice between architects, already licensed for this practice area and interior designers;
- Create confusion among building owners and inspectors; and
- Introduce ambiguity into systems designed to ensure accountability for public health, safety, and welfare in building design.

We urge the Committee to hold this bill for further study. **Rhode Island’s architecture licensure law already establishes a regulated profession responsible for protecting the public in building design.** Creating a second regulated profession with overlapping claims to health, safety, and welfare responsibility risks undermining the clarity and accountability the existing statute was designed to provide.

Thank you for your consideration and for your commitment to protecting the safety and clarity of Rhode Island’s built environment professions.

#### **AIA Rhode Island**

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