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Testimony in Opposition to Senate Bill S2518

State of Rhode Island Interior Design Practice Act

Senate Commerce Committee

Submitted by: Jonathan M. Taylor, AIA, Providence RI – jmtayloria@hotmail.com

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

Thank you for the opportunity to provide testimony in opposition to Senate Bill S2518.

I have been a Providence resident since 2003 and a licensed architect in Rhode Island since 2010. I work at LLB Architects in Pawtucket, a 20-person firm that has practiced in Rhode Island for nearly 90 years. The company has six principals; I was elevated to principal in 2021. The company has four architects on its certificate of authorization; I was added to the COA in 2023.

As an architect, and advocate for architectural licensure, I am deeply committed to protecting the health, safety, and welfare of the public, which is the core purpose of professional licensure in the design and construction fields. An architect is responsible for coordinating life-safety systems and submitting permit drawings. Rhode Island already has a licensure system designed for that responsibility.

While I have great respect for the contributions of interior designers, I must respectfully oppose this bill because it represents a significant and unnecessary encroachment into the regulated practice of architecture and creates serious risks for public safety, regulatory clarity, and professional accountability in Rhode Island.



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1. This Bill Authorizes Interior Designers to Perform Core Architectural Services

This bill authorizes registered interior designers to independently prepare and submit permit drawings for interior construction projects. Those documents necessarily include life-safety elements such as egress paths, occupant loads, and accessibility compliance.

These are not decorative services. These are architectural services.

They directly affect:

- Fire safety
- Emergency egress
- Accessibility compliance
- Occupant safety

These responsibilities are central to architectural licensure.

Architects are specifically educated, trained, and examined to manage the integrated and holistic design of buildings. **Buildings function as integrated systems. Interior construction cannot be separated from life-safety systems, structure, and egress.** Interior design decisions affect egress, fire safety, and accessibility.

Creating two separate professions authorized to independently submit permit drawings for overlapping scopes of work introduces confusion, fragmentation of responsibility, and increased risk to the public.

Building officials and fire marshals rely on clear professional responsibility when reviewing permit submissions. Introducing overlapping authority between professions makes it more difficult for code officials to determine who is responsible for life-safety compliance.

A lack of clarity on who carries legal responsibility for life-safety when permit drawings are submitted doesn't benefit the public.



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2. This Bill Undermines the Integrity of Architectural Licensure

Architectural licensure exists for a reason.

Architects must complete:

- A rigorous accredited education, typically five to seven years
- Thousands of hours of supervised professional experience
- The Architect Registration Examination (ARE), a comprehensive multi-division examination
- Ongoing continuing education requirements

This process takes nearly a decade for most architects.

Granting another profession parallel permitting authority without requiring the same licensure framework raises serious questions about fairness, professional standards, and public protection.

Licensure is not a title. It is a legal responsibility to protect the public.

3. Rhode Island Already Has a Clear Licensure Framework for Permit Responsibility

When a professional takes responsibility for life-safety elements of a building and submits drawings for permit, the public benefits from a single, clearly accountable professional licensure system.

Fortunately, Rhode Island currently has a well-established licensure framework for professionals who take legal responsibility for building design and permitting. That framework is architectural licensure.

For Interior Designers who wish to take on such responsibility, alternative pathways to architectural licensure should be considered, for which the professional knowledge base represented by NCIDQ certification could be evaluated as part of the acceptable education standard for admittance to the national Architect Registration Examination (ARE).



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Currently 18 U.S. jurisdictions, including New York, Vermont, New Hampshire, and Maine, allow candidates to pursue architectural licensure through experience-based pathways in lieu of a traditional (NAAB) accredited architecture degree. Rhode Island could follow suit.

Accessible pathways to architectural licensure for individuals without accredited architecture degrees should continue to be explored. Equitable access to the Architect Registration Examination (ARE) would allow those who wish to assume legal responsibility for building design to enter the existing licensure framework.

Creating a new parallel system with overlapping authority risks fragmenting that responsibility and is not the solution.

4. This Bill Creates Regulatory Conflict and Confusion

This legislation establishes a separate board with authority over services that overlap with the statutory definition of architectural practice.

This will create:

- Confusion among building officials
- Confusion among clients
- Confusion regarding professional responsibility and liability
- Increased administrative burden for the State

Rhode Island currently has a clear regulatory framework. This bill complicates it unnecessarily.

5. This Bill Is Not Necessary to Allow Interior Designers to Practice

Interior designers already practice freely in Rhode Island. They contribute tremendous value, particularly to building design and often prepare portions of interior construction drawings. They collaborate with architects, engineers, and clients every day.

This bill does not enable interior design. It expands independent permitting authority, and alters who takes legal responsibility for building safety and life safety performance.

That is a fundamental change. That responsibility is exactly why architectural licensure exists.



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Conclusion

This legislation is not about recognizing interior design as a profession. It already is one.

This legislation grants independent authority to perform architectural-level services without architectural licensure.

That change is unnecessary, creates regulatory conflict, undermines the architectural licensure system, and ultimately does not serve the public interest.

If an individual wishes to assume responsibility for architectural services, the appropriate pathway is architectural licensure, which continues to evolve and become more accessible.

I respectfully urge the Committee to hold Senate Bill S2518 for further study, so that a clearer and more coordinated regulatory approach can be considered.

Thank you for your time and your consideration.

Respectfully submitted,

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A stylized, handwritten signature in black ink, consisting of a large, bold 'J' followed by a vertical line and a horizontal base.

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