



**Department of Business Regulation
Office of the Director**

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March 10, 2026

The Honorable Robert Britto
Chairperson, Senate Committee on Commerce
State House
Providence, Rhode Island 02903

RE: S 2518 – AN ACT RELATING TO BUSINESSES AND PROFESSIONS – STATE OF RHODE ISLAND INTERIOR DESIGN PRACTICE ACT

Dear Chair Britto:

I am writing on behalf of the Department of Business Regulation to assist the Committee with consideration of S2518. This bill would establish registration and regulatory requirements for interior designers and a state Board of Interior Designers to oversee and enforce such requirements. The Act includes DBR in the definitions section but elsewhere only mentions DBR once, providing that the Board will conduct disciplinary proceedings in accordance with DBR's administrative hearing rules.

If an interior design board is established to exist within the DBR, the Department would require two (2) new administrative level FTEs (estimated cost, including benefits is \$250,000 per FTE) and funding for an electronic registration system (estimated cost of \$500,000) to support the new board and program. A more costly, executive director-level FTE would not be necessary (Sec. 5-97-112 of the bill). Additionally, the bill would need to be revised to be consistent with other professional boards that DBR supports, e.g. the board would be authorized to recommend suspension, revocation, and other disciplinary action, promulgation of regulations, but the Department Director will be the person authorized to undertake such actions. See RIGL 5-1-5. This is to ensure there are qualified and sufficient resources available to do the regulatory work (the professional board being made up of volunteers who meet monthly), ensure cost effectiveness and consistency, and provide sufficient state oversight to maintain state action immunity protection for the individual board members. See *North Carolina State Board of Dental Examiners v. FTC*, 574 U.S. 494 (2015). Lastly, the effective date would need to be adjusted to permit sufficient time for the appointment of board members, issuance of regulations, hiring of new FTEs, procurement of a registration system, and development and implementation of the registration application and procedures. We would suggest June 1, 2027.

We would be happy to meet with the Committee and/or sponsors to discuss further streamlining and efficiencies. Please do not hesitate to contact me at Elizabeth.dwyer@dbr.ri.gov or 401.462.9615 (office) or 401.578.6653 (mobile) with any questions or for additional information.

Thank you for your consideration of our position on this proposed legislation.

Sincerely,

Elizabeth Kelleher Dwyer, Esq.
Director, Department of Business Regulation

cc: Honorable Members of the Senate Committee on Commerce
The Honorable Hanna M. Gallo
Kristen Silvia, Deputy Chief of Staff/Director of Legislation