

**RI Architect Rules & Regulations**  
**Summary of Comments and Subsequent Changes**  
**First Public Comment Period 1/8/21 to 2/7/21**

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<b>AGENCY:</b>	Rhode Island Department of Business Regulation
<b>DIVISION:</b>	<b>Board of Examination and Registration of Architects</b>
<b>RULE IDENTIFIER:</b>	415-RICR-00-00-1
<b>REGULATION TITLE:</b>	<b>Rules and Regulations for Architects</b>
<b>RULEMAKING ACTION:</b>	Full Rulemaking, Amendment

After reviewing the comments received from eleven (11) individuals during the 1/8/21 to 2/7/21 public comment period, DBR and the Board have proposed additional amendments as summarized in these post comment changes. These amendments will be re-advertised for another 30-day comment period for additional feedback.

**Summary of Post-Comment Changes**

The following differences exist between the text of the proposed rule as first advertised and the second round of proposed amendments. In addition to this summary of changes, a redlined document showing the exact changes is attached with the post-comment changes highlighted in yellow.

1. *§ 1.4(A)(10) – IPAL definition should not use “Program.”* Commentary was received that the IPAL an initiative of NCARB is an optional path in a NAAB accredited program. As program is highly used for NAAB accredited programs, it should not be used in this context to avoid confusion. We suggest deleting the word program: “IPAL” means NCARB's Integrated Path to Architectural Licensure.”

In response to this commentary, we have deleted the word “program” from the definition in § 1.4(A)(10) and from § 1.6(C), the only other place it appeared after IPAL.

2. *§ 1.6(C) – Amendments should match NCARB’s model law language.* Commentary was received suggesting the following instead, “The ARE® will be given to all applicants qualifying under R.I. Gen. Laws § 5-1-8, and to students actively participating in a NCARB-accepted Integrated Path to Architectural Licensure (IPAL) option within a NAAB-accredited professional degree program in architecture.”

In response to this commentary, we have made changes consistent with this request. Paragraph (C) is now proposed to read: “The ARE® will be given to all applicants qualifying under R.I. Gen. Laws § 5-1-8, and to those applicants actively participating in a NCARB-accepted IPAL option within a NAAB-accredited professional degree program

in architecture.” Also, as a result of using the acronym “NAAB” we added a definition for it in § 1.4(A)(11).

3. § 1.7(B)(3) – *Why do we regulation the use of the word “Associate” in architect firm names?* Commentary was received that this paragraph was not necessary.

No changes to this paragraph were proposed in this set of amendments. However, the Department and the Board agree with this commentary that the regulation of the word “associate” in firm names is no longer necessary. It is not set forth in NCARB model law. Significantly, this leads to COA amendments and/or registration problems when existing firms no longer have more than one architect working at the firm. It would be an absurd result to make a firm called “Smith and Associates” change its name after 30 years in business because Smith no longer employs any other architects. Furthermore, we do not believe that this change would result in confusion to the public. Therefore, we propose to delete this paragraph and will advertise the change in a second public comment period.

4. § 1.8 - *Clarify the criteria of what CEH courses are accepted? How can CEH’s be obtained? Is an AIA Transcript sufficient? How does RI determine CEH compliance? Does RI’s criteria match that of AIA?* Commentary was received regarding questions of specific CEH requirements. As a result, the Board has proposed the following post-comment changes which will be again advertised for public comment. These changes reflect the existing requirements and are not substantive program changes.

In 1.8(C) we added the following sentence: “The Board does not pre-approve any courses or course providers and will accept any course which is designated as Health, Safety and Welfare hours for continuing education credits.”

In 1.8(E) we added language to codify the existing requirements to explain courses may be taken in person or online and that online instruction may be asynchronous. This language was drafted to use consistent terminology with other recent continuing education regulation amendments across the Department (Real Estate and Accountancy). It states: “CEHs may be acquired at any location, through in-person or remotely delivered instruction. Remotely-delivered online courses may be presented either as a live/synchronous course or as an on-demand/pre-recorded/asynchronous course.”

In 1.8(J)(2) we clarified the type of documentation required to be maintained as proof of completion. The Board will accept completion certificates or AIA transcripts. We also added this sentence: “Proof of completion is determined by the Board’s review of completion certificates or an AIA transcript for CEHs that are identified as Health, Safety and Welfare.”

5. § 1.8(D) – *CEH credit for architect’s service on zoning, planning boards, etc.* Commentary was received that this should only provide credit for service on the RI architect board and that the board should allow similar self-reporting for architects serving on RI zoning, planning boards, etc.

Given that there may be RI architect registrants who serve on other state licensing boards, we would not want to limit the credit for such work to only the RI Board. However, the Board will review and consider an expansion to planning and zoning, historic district commissions, and the Building Code Standards Committee, Fire Safety Code Board of Appeal and Review.

### **Summary of Comments Not Resulting in Regulatory Language Changes**

Below is a summary of other public comments that did not result in changes to the text of the Regulation and a brief description of the Department's reasons for not making any such changes after due consideration.

1. *Expand the scope of qualifying continuing education.* Commentary was received that the Board should provide credit for self-directed research and education.

The Department declines to make a change in response to these comments. Continuing education is based upon a national standard which focuses on structured educational activities in Health, Safety and Welfare subjects. Such structured activities from continuing education course providers provide an objective basis for consistent continuing education for all architect registrants and such courses are eligible for credit in all US jurisdictions.

2. The Board received commentary from four individuals in support of or providing no commentary on the proposed amendments.

415-RICR-00-00-1

## TITLE 415 – BOARD OF EXAMINATION AND REGISTRATION OF ARCHITECTS

CHAPTER 00 – N/A

SUBCHAPTER 00 – N/A

PART 1 – [Rules and Regulations for](#) Architects

### 1.1 Authority

This Regulation is promulgated by the Board of Examination and Registration of Architects with the approval of the Director of the Department of Business Regulation promulgated in accordance with R.I. Gen. Laws §§ 5-1-5 ~~and 42-14-17~~.

### 1.2 Scope

This Regulation applies to the licensing and regulation of the practice of architecture in Rhode Island.

### 1.3 Purpose

The purpose of this Regulation is to describe the practices and procedures of the Board and to set forth the rules promulgated to enforce R.I. Gen. Laws § 5-1-1 *et seq.* for the regulation of the practice of architecture within the State.

### 1.4 Definitions

A. Terms that are not listed in § 1.4 of this Part shall have the meanings provided by R.I. Gen. Laws § 5-1-1 *et seq.* and/or the meanings set forth in the remaining sections of this Regulation.

1. “Act” means R.I. Gen. Laws § 5-1-1 *et seq.*
2. ["ARE"® means the Architect Registration Exam® developed and administered by NCARB.](#)
3. [“Board”](#) means the Board of Examination and Registration of Architects and/or, when the context permits, to the relevant administrative personnel or authorized agents thereof. Within the Department, the Board is organized under the “Division of [Building](#), Design [and Fire](#) Professionals.”
- ~~34.~~ “COA” means Certificate of Authorization.

45. "Continuing education hour" or "CEH" means one (1) continuous instructional hour (fifty (50) to sixty (60) minutes of contact) spent in Structured Educational Activities intended to increase or update the architect's knowledge and competence in Health, Safety, and Welfare Subjects.
6. "Department" means the Rhode Island Department of Business Regulation.
57. "Director" means the Director of the Rhode Island Department of Business Regulation or his/her designee.
68. "Division of Building, Design and Fire Professionals" means the State Building Office ~~administrative division~~ of the Department of Business Regulation comprised of the Board of Examination and Registration of Architects, the Board of Examiners of Landscape Architects, the Board of Registration for Professional Engineers, and the Board of Registration for Professional Land Surveyors, the Office of the State Building Commissioner, and the Contractor's Registration and Licensing Board in accordance with R.I. Gen. Laws § 5-84-1 *et seq.*
79. "Experience" and "Training" are interchangeable and mean satisfactory architecturally related employment as required by NCARB.
10. "IPAL" means NCARB's Integrated Path to Architectural Licensure Program.
811. "NAAB" means the National Architectural Accrediting Board.
12. "NCARB" means the National Council of Architectural Registration Boards.
913. "Principal" means an architect who:
- Is in responsible control of the organization's architectural practice either alone or in concert with other architect(s);
  - Is responsible for the profits and losses of the firm;
  - Is legally liable for the acts of the firm; and
  - Who holds one (1) of the following positions: sole proprietor if the practice is through a sole proprietorship, director or officer (or shareholder if there are no directors or officers) if the practice is through a corporation, general partner if the practice is through a partnership or through a limited liability partnership, manager (or member if there are no managers) if the practice is through a limited liability company.

- ~~40~~<sup>14</sup>. “Responsible control” means that amount of control over and detailed professional knowledge of the content of technical submissions during their preparation as is ordinarily exercised by registered architects applying the required professional standard of care, including but not limited to an architect’s integration of information from manufacturers, suppliers, installers, the architect’s consultants, owners, contractors, or other sources the architect reasonably trusts that is incidental to and intended to be incorporated into the architect’s technical submissions if the architect has coordinated and reviewed such information. Other review, or review and correction, of technical submissions after they have been prepared by others does not constitute the exercise of responsible control because the reviewer has neither control over nor detailed professional knowledge of the content of such submissions throughout their preparation.
- ~~44~~<sup>15</sup>. “Seal” means the symbol meeting the specifications set forth herein that evidences registration as an architect under R.I. Gen. Laws Chapter 5-1.
- ~~42~~<sup>16</sup>. “Stamp” means the instrument to manually apply a seal evidencing registration of an architect under R.I. Gen. Laws Chapter 5-1.
- ~~43~~<sup>17</sup>. “State,” as used in R.I. Gen. Laws § 5-1-9, means any jurisdiction recognized by NCARB, including any foreign jurisdictions in which Rhode Island is a signatory to a Mutual Recognition Agreement or similar agreement with NCARB.

## 1.5 Applications

- A. Applications for examinations – Exam candidates <sup>s</sup> must apply directly to the NCARB Direct Registration Program.
- B. The Board authorizes the Board Executive and/or other designated administrative staff member to approve applications for registration by examination and reciprocity, ~~Certificates of Authorization~~ <sup>COAs</sup>, and renewals thereof upon receipt of all submissions required by the application provided by the Board, including the application fee, provided that the applicant does not have a record of disciplinary history.
- C. Applicants for examination, reciprocity, COA, and renewal thereof must disclose any and all disciplinary action imposed by other professional registration jurisdictions or NCARB.
- D. Applicants for reciprocity and renewal must certify completion of continuing education in accordance with the Board’s requirements for continuing education.
- E. If a new application is approved after renewal applications have been mailed, then that applicant’s registration shall be valid for twenty-seven (27) months.

## 1.6 Architectural Registration Exam® (“ARE®”)

- A. Evaluation of education and training credits shall be at the discretion of the Board and in general accordance to NCARB criteria.
- B. All applicants are required to comply with such requirements for taking and passing the Architectural Registration Examination (ARE)® as shall be established by NCARB.
- C. The ARE® will be given to all applicants qualifying under R.I. Gen. Laws § 5-1-8, and to those applicants actively participating in a NCARB’s-accepted IPAL option within a NAAB-accredited professional degree program in architectureProgram. Applicants enrolled in an NCARB approved IPAL degree program may take components of the ARE® prior to graduation.
- D. The ARE® shall be taken and successfully passed by all applicants.
- E. The scope, dates, times and location(s) of the ARE® are established by NCARB.
- F. The minimum-passing grade in all subjects of the ARE® shall be as established by NCARB.
- G. All applicants may retake failed divisions of the ~~examination~~ ARE® as many times as the applicant wishes and must pay a new fee at each re-examination.

## 1.7 Practice Rules

- A. Architect’s Seal and Stamp
  - 1. Seal – The seal is a symbol, one and one half inches (1-½”) in diameter consisting of two (2) concentric circles; the outer being one and one half inches (1-½”) in diameter and the inner being one and one eighth inches (1-1/8”) in diameter. The space between the circles shall contain the name of the architect at the top and the word “Architect” at the bottom. The inner circle contains the State emblem and the architect’s certificate number. The word “Registered” shall appear below the State’s emblem, just above the word “Architect” in the space between circles.
  - 2. The Board shall loan each architect the right to purchase an individual stamp capable of imprinting the seal to be used, as hereinafter directed in the following paragraph, on all documents prepared by the architect or under the architect’s responsible control, for use in the State of Rhode Island, for the purpose of manually imprinting the drawings, specifications or project manual, and other documents. An electronically generated seal may be used in lieu of the hand stamp.
  - 3. The seal shall be applied on documents so as to produce a legible reproduction on all copies or prints made from the documents. The

architect's name shall be placed across the seal and dated below the seal. Electronic signature and dating ~~is~~are permitted.

4. The architect shall use or electronically submit the seal only if in responsible control of the project.
5. Upon retirement, certificate revocation, or non-payment of renewal fee, the loaned right to the stamp and use of the seal shall be voided and the stamp shall be immediately returned to the Board. If not returned to the Board within sixty (60) days, or within fifteen (15) days of a notice to return, the Board will notify NCARB of this Rule violation and take action as allowed by ~~the act~~R.I. Gen. Laws Chapter 5-1.
6. Expired Certificates – Application for restoration of an expired certificate, which has been allowed to lapse for not more than six (6) months, shall be approved by the Board upon receipt of the required registration fees. Application for the restoration of an expired certificate, which has been allowed to lapse for a period of six (6) months to not more than two (2) years may be reinstated at the discretion of the Board and in so deciding the Board may require a brief outline setting forth the professional activities of the applicant during the lapsed period, and, if the applicant is a non-resident, the Board may also require the submission of a completed NCARB Council Record and Certificate. If the certificate has been expired for more than two (2) years, the applicant shall follow the procedure for a new application.

#### B. Firm Names

1. When personal names of architects are used in the name of the firm, only names of living registrants or former registered members now retired or deceased may be used. Any reference in the firm name to other persons of the firm, partnership, corporation, limited liability company and limited liability partnership shall be permitted only when such other persons are design professionals (landscape architects, professional engineers or professional land surveyors) and their identity is made known specifically on letterheads of the firm (sole proprietorship, partnership, corporation, limited liability company and limited liability partnership).
2. A firm is permitted to practice under a name, which does not include the names of registered principals, provided said name is submitted to the Board for review and approved before adoption of same. A firm, using such an assumed name shall file with the Board the name of each registered member of the firm. The Board shall be promptly advised of any and all changes in the composition of a firm that may occur subsequent to the original filing, and the COA shall be resubmitted for approval.



3. ~~Any use of the word "Associate" or "Associates" in the title of a firm, partnership, corporation, limited liability company or limited liability partnership shall be permitted only when it refers to other registered architects, landscape architects, professional engineers or registered land surveyors in the firm, partnership, corporation, limited liability company or limited liability partnership and their identity and professional status is made known on letterheads of the firm, partnership, corporation, limited liability company or limited liability partnership. The title "Associate" shall only be given to registered professionals of the firm, partnership, corporation, limited liability company or limited liability partnership. The use of the plural form of "Architect" — "Architects" shall only be used in a firm's title if there is more than one (1) architect at the business.~~

## 1.8 Continuing Education ("C.E.")

- A. Continuing education is post-licensure learning that enables a registered architect to increase or update knowledge of and competence in technical and professional subjects related to the practice of architecture to safeguard the public's health, safety, and welfare.
- B. In addition to all other requirements for registration renewal, an architect must complete a minimum of twelve (12) ~~Continuing Education Hours~~ **CEHs** each calendar year or be exempt from these continuing education requirements as provided in § 1.8(G) of this Part. Failure to comply with these requirements may result in non-renewal of the architect's registration.
- ~~C. A Continuing Education Hour (CEH) is one continuous instructional hour (50 to 60 minutes of contact) spent in Structured Educational Activities intended to increase or update the architect's knowledge and competence in Health, Safety, and Welfare Subjects.~~
- 4C.** In order to receive credit, all CEHs must be from received Structured Educational Activities intended to increase or update the architect's knowledge and competence in Health, Safety, and Welfare Subjects. The Board does not pre-approve any courses or course providers and will accept any course which is designated as Health, Safety and Welfare hours for continuing education credits.
1. Health, Safety, and Welfare Subjects are technical and professional subjects that the Board deems appropriate to safeguard the public and that are within the following enumerated areas necessary for the proper evaluation, design, construction, and utilization of buildings and the built environment, including but not limited to:
- a. BUILDING SYSTEMS: Structural, Mechanical, Electrical, Plumbing, Communications, Security, Fire Protection

- b. CONSTRUCTION CONTRACT ADMINISTRATION: Contracts, Bidding, Contract Negotiations
  - c. CONSTRUCTION DOCUMENTS: Drawings, Specifications, Delivery Methods
  - d. DESIGN: Urban Planning, Master Planning, Building Design, Site Design, Interiors, Safety and Security Measures
  - e. ENVIRONMENTAL: Energy Efficiency, Sustainability, Natural Resources, Natural Hazards, Hazardous Materials, Weatherproofing, Insulation
  - f. LEGAL: Laws, Codes, Zoning, Regulations, Standards, Life Safety, Accessibility, Ethics, Insurance to Protect Owners and Public
  - g. MATERIALS and METHODS: Construction Systems, Products, Finishes, Furnishings, Equipment
  - h. PRE-DESIGN: Land Use Analysis, Programming, Site Selection, Site and Soils Analysis, Surveying
  - i. PRESERVATION: Historic, Reuse, Adaptation
2. Structured Education Activities are educational activities in which at least seventy-five percent (75%) of an activity's content and instructional time must be devoted to Health, Safety, and Welfare Subjects related to the practice of architecture, including courses of study or other activities under the areas identified as Health, Safety, and Welfare Subjects and provided by qualified individuals or organizations, whether delivered by direct contact or distance learning methods.
- D3.** If the provider of the Structured Educational Activities prescribes a customary time for completion of such an Activity, then such prescribed time shall, unless the Board finds the prescribed time to be unreasonable, be accepted as the architect's time for Continuing Education Hour purposes irrespective of actual time spent on the activity.

#### D. Self-Reported Continuing Education Hours

1. CEH in Health, Safety, and Welfare may be awarded for verified membership and service on a State Board of Registration/Licensure of Architects, or for service on a Rhode Island zoning board, planning board, historic district commission, the Rhode Island Building Code Standards Committee, the Rhode Island Fire Safety Code Board of Appeal and Review, and the Rhode Island Rehabilitation Building and Fire Code for Existing Buildings and Structures board. Registrants may claim one (1) CEH per meeting attended up to a maximum of four (4) CEHs per year.

with a maximum of eight (8) CEHs per biennium. For each CEH claimed, an architect must be able to prove attendance at one (1) board meeting that was in session for at least fifty (50) minutes. Acceptable proof of attendance includes meeting minutes or recording of meeting demonstrating attendance and participation.

2. No other types of self-reported CEHs qualify for CEH credit in Rhode Island.

- E. ~~Continuing Education Hours~~CEHs may be acquired at any location, through in-person or remotely delivered instruction. Remotely-delivered online courses may be presented either as a live/synchronous course or as an on-demand/pre-recorded/asynchronous course.
- F. Excess ~~Continuing Education Hours~~CEHs may not be credited to a future calendar year.
- G. Exemptions – An architect shall not be subject to these requirements if:
1. The architect has been granted emeritus/emerita status by the Board; or
  2. The architect otherwise meets all renewal requirements and is called to active military service, has a serious medical condition, or can demonstrate to the Board other like hardship, then upon the Board's so finding, the architect may be excused from some or all of these requirements.
- H. For the Architect's first renewal period or fraction thereof, the continuing education requirements for renewal shall be required at the rate of one (1) ~~continuing education hour (CEH)~~ per month of registration.
- I. If an architect has allowed registration to lapse in Rhode Island for more than two (2) years, the architect shall upon application provide evidence of compliance with Rhode Island's requirements for the lapsed period. Continued registration in an NCARB recognized jurisdiction that requires continuing education will be deemed to satisfy this requirement.
- J. Reporting ~~and~~ Recordkeeping and Audits
1. An architect shall complete and submit forms as required by the Board certifying that the architect has completed the required ~~Continuing Education Hours~~CEHs.
  2. Forms may be audited by the Board for verification of compliance with these requirements. Documentation of reported ~~Continuing Education Hours~~CEHs in the form of completion certificates or an American Institute of Architects (AIA) transcript shall be maintained by the architect for six (6) years from the date of award. Proof of completion is determined by the

Board's review of completion certificates or an AIA transcript for CEHs that are identified as Health, Safety and Welfare.

3. If the Board disallows any ~~Continuing Education Hours~~ CEHs, the architect shall have sixty (60) days from notice of such disallowance either to provide further evidence of having completed the ~~Continuing Education Hours~~ CEHs disallowed or to remedy the disallowance by completing the required number of ~~Continuing Education Hours~~ CEHs (but such ~~Continuing Education Hours~~ CEHs shall not again be used for the next calendar year).
4. If the Board finds, after proper notice and hearing, that the architect willfully disregarded these requirements or falsified documentation of required ~~Continuing Education Hours~~ CEHs, the architect may be subject to disciplinary action in accordance with R.I. Gen. Laws Chapter 5-1 and this Part ~~the Board regulations~~.

## 1.9 Inter-Jurisdictional Practice

No one shall practice or offer to practice architecture in the State of Rhode Island unless they are registered and hold a COA in accordance with R.I. Gen. Laws § 5-1-7.

## 1.10 Non-practicing Individuals

- A. Interns – A person currently employed under the responsible control of an architect and who maintains in good standing a National Council of Architectural Registration Boards Record may use the title “intern architect” or “architectural intern” in conjunction with his/her current employment, but may not engage in the practice of architecture except to the extent that such practice is excepted from the requirement of registration.
- B. “Architect Emeritus/Emerita” – Upon written application to the Board, retired architects who surrender the stamp and use of the seal to the Board may use the honorary title “Architect Emeritus/Emerita” but are prohibited from practicing architecture in the State of Rhode Island.

## 1.11 Hearings, Administrative Procedures and Access to Public Records

- A. Wherever a hearing is required by law, said hearing shall be conducted pursuant to R.I. Gen. Laws § 5-1-13.1, the Department’s Rules of Procedure for Administrative Hearings, 230-RICR-10-00-2, and in accordance with the Administrative Procedures Act, R.I. Gen. Laws § 42-35-1, *et seq.* Complaints shall be handled pursuant to § 230-RICR-10-00-2.4. Where necessary, the Director of the Department shall appoint a Hearing Officer pursuant to R.I. Gen. Laws § 42-6-8.

- B. Requests for declaratory rulings and petitions for rulemaking shall be handled pursuant to the Department's Regulation for Declaratory Rulings and Petitions, [230-RICR-10-00-3](#), and in accordance with the Administrative Procedures Act, R.I. Gen. Laws § 42-35-1 *et seq.*
- C. Requests for records pursuant to the Access to Public Records Act shall be handled pursuant to the Department's Regulation for Access to Public Records, [230-RICR-10-00-1](#) and the Access to Public Records Act, R.I. Gen. Laws § 38-2-1 *et seq.*

## 1.12 Professional Standards

### A. Competence

- 1. In engaging in the practice of architecture, a registered architect's primary duty is to protect the public's health, safety, and welfare. In discharging this duty, a registered architect shall act with reasonable care and competence and shall apply the technical knowledge and skill which are ordinarily applied by architects of good standing practicing in the same locality.
- 2. In designing a project, a registered architect shall ~~take into account~~[consider](#) all applicable State and municipal building laws and Regulations. While a registered architect may rely on the advice of other professionals (e.g., attorneys, engineers, and other qualified persons) as to the intent and meaning of such laws and Regulations, once having obtained such advice, a registered architect shall not knowingly design a project in violation of such laws and Regulations.
- 3. A registered architect shall undertake to perform professional services only when he/she, together with those whom the registered architect may engage as consultants, is qualified by education, training, and experience in the specific technical areas involved.
- 4. No individual shall be permitted to engage in the practice of architecture if, following opportunity for a hearing, findings are made that such an individual's professional competence is, despite reasonable accommodations, substantially impaired by physical or mental disabilities.

### B. Conflict of Interest

- 1. A registered architect shall not accept compensation in connection with his/her services from more than one (1) party on a project, unless the circumstances have been agreed to by all interested parties in writing following written disclosure to all parties.
- 2. If a registered architect has any business association or direct or indirect financial interest which is substantial enough to influence his/her judgment

in connection with the performance of professional services, the registered architect shall fully disclose in writing to his/her client or employer the nature of the business association or financial interest. If the client or employer objects to such association or financial interest, the registered architect will either terminate such association or interest or offer to give up the commission or employment.

3. A registered architect shall not solicit or accept compensation from material or equipment suppliers in connection with specifying or endorsing their products. As used herein, "compensation" shall not mean customary and reasonable business hospitality, entertainment, or product education.
4. When acting as the interpreter of building contract documents and the judge of contract performance, a registered architect shall render decisions impartially, favoring neither party to the contract.

C. Full Disclosure

1. A registered architect making public statements on architectural questions shall disclose when he/she is being compensated for making such statements or when he/she has an economic interest in the issue.
2. A registered architect shall accurately represent to a prospective or existing client or employer his/her qualifications and the scope of his/her responsibility in connection with work for which he/she is claiming credit.
3. If, in the course of his/her work on a project, a registered architect becomes aware of a decision taken by his/her employer or client against such architect's advice that violates applicable state or municipal building laws and Regulations and which will, in the registered architect's judgment, materially and adversely affect the safety to the public, the architect shall:
  - a. Report the decision to the local building inspector or other public official charged with the enforcement of the applicable State or municipal building laws ~~and; and~~
  - b. Refuse to consent to the decision; and
  - c. In circumstances where the registered architect reasonably believes that other such decisions will be taken notwithstanding his/her objection, terminate his/her services with respect to the project unless the registered architect is able to cause the matter to be resolved by other means. In the case of a termination in accordance with § 1.12(C)(3)(c) of this Part, the registered architect shall have no liability to his/her client or employer on account of such termination.

4. A registered architect shall not deliberately make a materially false statement or fail deliberately to disclose accurately and completely a material fact requested in connection with his/her application for a registration or renewal thereof or otherwise lawfully requested by the Board.
5. A registered architect shall not assist the application for registration of an individual known by the registered architect to be unqualified in respect to education, training, experience or character.
6. A registered architect possessing knowledge of a violation of the provisions of § 1.12 of this Part by another registered architect shall report such knowledge to the Board.

D. Compliance with Laws

1. A registered architect shall not, in the conduct of his/her practice, knowingly violate any State or Federal criminal law.
2. An architect shall neither offer nor make any payment or gift to a government official (whether elected or appointed) with the intent of influencing the official's judgment in connection with a prospective or existing project in which the registered architect is interested.
3. A registered architect shall comply with the registration laws and Regulations governing his/her professional practice in any United States jurisdiction. An architect may be subject to disciplinary action if, based on grounds substantially similar to those which would lead to disciplinary action in this jurisdiction, the architect was disciplined in any other United States jurisdiction.
4. An employer engaged in the practice of architecture shall not have been found by a court or an administrative tribunal to have violated any applicable Federal or State law protecting the rights of persons working for the employer with respect to fair labor standards or with respect to maintaining a workplace free of discrimination. For purposes of this Rule, any registered architect employed by a firm engaged in the practice of architecture who is in charge of the firm's architectural practice, either alone or with other architects, shall be deemed to have violated this Rule if the firm has violated this Rule.

E. Professional Conduct

1. Each office in Rhode Island engaged in the practice of architecture shall have an architect resident and regularly employed in that office.
2. The signature and use of the seal shall mean that the registered architect sealing the submission was in responsible control over the content of such

technical submissions during their preparation and has applied the required professional standard of care. A registered architect may sign and seal technical submissions only if the technical submissions were:

- a. Prepared by such architect;
  - b. Prepared by persons under such architect's responsible control;
  - c. Prepared by another registered architect if the signing and sealing architect has reviewed the other architect's work and either has coordinated the preparation of the work or has integrated the work into his/her own technical submissions; or
  - d. Prepared by another architect registered in any United States jurisdiction and holding a current and valid certification issued by NCARB, provided that the technical submissions are prototypical building documents the signing and sealing architect has reviewed the other architect's work and has integrated the work into his/her own technical submissions.
3. A registered architect may also sign or seal drawings, specifications, or other work which is not required by law to be prepared by an architect if the architect has reviewed such work and has integrated it into his/her own technical submissions.
  4. Any registered architect signing or sealing technical submissions not prepared by that architect but prepared under the architect's responsible control by persons not regularly employed in the office where the architect is resident, shall maintain and make available to the Board upon request for at least five (5) years following such signing and sealing, adequate and complete records demonstrating the nature and extent of the architect's control over and detailed knowledge of such technical submissions throughout their preparation.
  5. Any registered architect signing and sealing technical submissions integrating the work of another architect into the registered architect's own work as permitted under §§ 1.12(E)(2)(c) and (d) of this Part shall maintain and make available to the Board upon request for at least five (5) years following such signing and sealing, adequate and complete records demonstrating the nature and extent of the registered architect's review of and integration of the work of such other architect's work into his/her own technical submissions, and that such review and integration met the required professional standard of care.
  6. A registered architect shall not engage in conduct involving fraud or wanton disregard of the rights of others.



7. A registered architect shall not make misleading, deceptive or false statements or claims to the public in the course of providing or offering to provide architectural services or to the Board.
8. A registered architect shall neither offer nor make any gifts, other than gifts of nominal value (including, for example, reasonable entertainment and hospitality), with the intent of influencing the judgment of an existing or prospective client in conjunction with a project in which the registered architect is interested.

### **1.13 Severability**

If any provision of this Regulation or the application thereof to any person or circumstance is held invalid or unconstitutional, the invalidity or unconstitutionality shall not affect other provisions or applications of this Regulation which can be given effect without the invalid or constitutional provision or application, and to this end the provisions of this Regulation are severable.

## Stewart, Amy (DBR)

---

**From:** Bill Shepherd <williamgshepard@comcast.net>  
**Sent:** Sunday, January 17, 2021 5:07 PM  
**To:** Stewart, Amy (DBR)  
**Subject:** [EXTERNAL] : Architect Continuing Education Credit Hours

I would like to offer my comments about “continuing education credits” for architects and the proposed new regulations. First, I would like to note that I am current on ALL of the board requirements by completing commercially available classes, submitting the documentation and receiving board approval in writing - (I was subject to a targeted audit). That is because my previous submission of MANY hundreds of hours of actual research (and implementation) of new Health Safety and Welfare solutions in the jungles of post war, Central Colombia was evidentially deemed to not have been “Structured Educational Activities”, and not a single credit hour was allowed!

In order to receive credit, all CEHs must be from received Structured Educational Activities intended to increase or update the architect's knowledge and competence in Health, Safety, and Welfare Subjects.

To my disappointment, I feel that the board is missing the point and choosing easy to track, predigested, “educational units” over real, on the ground, research, which saves lives in the process. From many decades as an adjunct professor, I learned that there are two types of learning, active and passive. Passive learning is consuming some pre-prepared educational product. Its comfortable, has its place and might even add some quality to one’s individual skills, but adds nothing to the body of knowledge we call architecture.

Active education is pure research where it is self-directed - by necessity - because the answers do not yet exist. For example, clean water in a third world country. Yes, we all know the science of providing clean water, but show me a practical way of doing that in a third world country without modern equipment or materials! The self-directed “educational process” is admittedly “messy”, and hard to document, but strives to achieve the standards of practice that we as professionals should be aiming for. And, yes, it is educationally rigorous! Finding solutions to previously unsolvable issues takes hard work!

I urge the board to reconsider its narrow definition of “continuing education”. By limiting the meaning to ONLY “educational units” they are, in my opinion, diminishing the architect’s opportunity to strive for higher standards. (I do note however that the board reserves an exception for itself by simply sitting on the board).

Our responsibility is not to only improve our own personal skills. We have the knowledge, ability and responsibility to improve life itself.

## Stewart, Amy (DBR)

---

**From:** Dave A <david07elm@gmail.com>  
**Sent:** Tuesday, January 12, 2021 8:36 PM  
**To:** Stewart, Amy (DBR)  
**Subject:** thank you - Re: [EXTERNAL] : Proposed Amendments to Architect Regulation - comment

Amy,

thank you for responding.

NCARB does a great job. I am currently utilizing their self testing system for yearly licensure requirements and the study topics are very well done, informative and useful.

Also glad for their involvement in the industry and acceptance by RI, providing guidance and unbiased learning tools, raising everyone's standards.

Sincerely,  
david altman, RA

On Mon, Jan 11, 2021 at 9:12 AM Stewart, Amy (DBR) <[Amy.Stewart@dbr.ri.gov](mailto:Amy.Stewart@dbr.ri.gov)> wrote:

Hi David,

The proposed Architect amendments are only recognizing the IPAL program in RI as an acceptable path to licensure. Any questions regarding how the IPAL program works should be directed to NCARB. <https://www.ncarb.org/become-architect/ipal> [[ncarb.org](https://www.ncarb.org)]

Regards,

Amy C. Stewart, Esq.

Deputy Chief of Legal Services

Department of Business Regulation

<https://dbr.ri.gov/>

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**From:** Dave A <[david07elm@gmail.com](mailto:david07elm@gmail.com)>

**Sent:** Saturday, January 9, 2021 8:27 PM

**To:** Stewart, Amy (DBR) <[Amy.Stewart@dbr.ri.gov](mailto:Amy.Stewart@dbr.ri.gov)>

**Subject:** [EXTERNAL] : Proposed Amendments to Architect Regulation - comment

Mrs. Stewart,

Will participation in IPAL affect architectural internship requirements?

sincerely,

david altman, RA

[david07elm@gmail.com](mailto:david07elm@gmail.com)

## Stewart, Amy (DBR)

---

**From:** Broadfield, Dawne (DBR)  
**Sent:** Friday, January 8, 2021 11:51 AM  
**To:** Donald F Minnery  
**Cc:** Stewart, Amy (DBR)  
**Subject:** RE: [EXTERNAL] : Re: Rhode Island - Proposed Amendments to Architect Regulations

Mr. Minnery,

Thank you for your review and comments. As directed in the email, I have copied [Amy.Stewart@dbr.ri.gov](mailto:Amy.Stewart@dbr.ri.gov), on your response.

Please do not hesitate to contact me any time.

-----  
Respectfully,

*Dawne Broadfield*

**Rhode Island Department of Business Regulation**

**Division of Building, Design and Fire Professionals**

*[Board of Examination and Registration of Architects]*

*[Board of Examiners of Landscape Architects]*

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**From:** Donald F Minnery <dminnery@saratogaassociates.com>  
**Sent:** Friday, January 08, 2021 11:42 AM  
**To:** Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbr.ri.gov](mailto:Dawne.Broadfield@dbr.ri.gov)>  
**Subject:** [EXTERNAL] : Re: Rhode Island - Proposed Amendments to Architect Regulations

Dawne:

I have reviewed the changes and have no comment. I have concerns regarding the IPAL program but the program has been vetted and put forward by NCARB and I have confidence in their decisions.

Thank you for allowing my review and opportunity to comment.

Don

On Fri, Jan 8, 2021 at 9:39 AM Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbr.ri.gov](mailto:Dawne.Broadfield@dbr.ri.gov)> wrote:

To Interested Parties:

Please be advised that the Rhode Island Department of Business Regulation is accepting written comments on its proposal to amend [415-RICR-00-00-1, Rules and Regulations for Architects](#). These amendments primarily involve recognition of NCARB's IPAL program and a continuing education credit for members of state architecture licensing.

Written comments should be submitted no later than February 7, 2021, to [amy.stewart@dbr.ri.gov](mailto:amy.stewart@dbr.ri.gov) or submitted on the on the [Secretary of State's Rulemaking website](#) under the "Comments" tab. The proposed amended regulation can be accessed by the links in this email or the Department's [website](#).

-----  
Respectfully,

*Dawne Broadfield*

**Rhode Island Department of Business Regulation**

**Division of Building, Design and Fire Professionals**

*[Board of Examination and Registration of Architects]*

*[Board of Examiners of Landscape Architects]*

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--

**Donald F. Minnery, AIA, NCARB, LEED® AP**

Chairman

Executive Vice President



Landscape Architects, Architects,

Engineers, and Planners, P.C.

21 Congress Street, Suite 201

Saratoga Springs, NY 12866

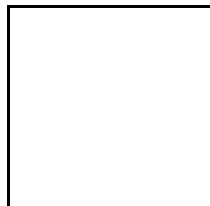
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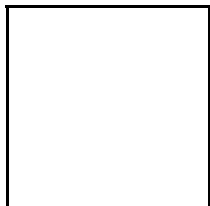
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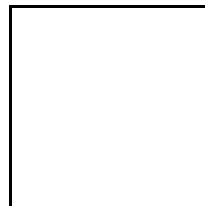
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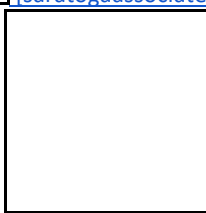
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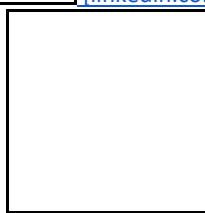
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**Stewart, Amy (DBR)**

---

**From:** John Cruet mac <[john.cruet@frontier.com](mailto:john.cruet@frontier.com)>  
**Sent:** Monday, January 11, 2021 10:40 AM  
**To:** Stewart, Amy (DBR)  
**Subject:** [EXTERNAL] : Rhode Island change in Architect Regulations

To whom it may concern:

I currently hold a license to practice in Rhode Island and also have AIA membership and NCARB certification.

What criteria is being used to determine the validity of ANY CEH course?

How does Rhode Island determine compliance?

Does Rhode Island's criteria match that of the American Institute of Architects (AIA)?

These regulations should address these issues.

Regards,

**John Cruet, Jr., A.I.A.**

**Architect**

P. O. Box 435

Guilford, CT 06437

TEL: (203)453-1487 FAX: (203) 458-9802

email: [john.cruet@frontier.com](mailto:john.cruet@frontier.com)

Internet: [www.johncruet.com](http://www.johncruet.com) [[johncruet.com](http://johncruet.com)]

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## Stewart, Amy (DBR)

---

**From:** Marthe Rowen <rowenmarthe@gmail.com>  
**Sent:** Friday, January 8, 2021 10:17 AM  
**To:** Stewart, Amy (DBR)  
**Subject:** Re: [EXTERNAL] : Re: NOTICE: Rhode Island - Proposed Amendments to Architect Regulations

Hello,

Thank you for the prompt response and clarification. I did read through this, but it was not clear to me if the existing means of acquiring credit hours was to be replaced or expanded.

Marthe Rowen

On Fri, Jan 8, 2021 at 10:15 AM Stewart, Amy (DBR) <[Amy.Stewart@dbr.ri.gov](mailto:Amy.Stewart@dbr.ri.gov)> wrote:

Marthe,

There is no change to existing CE credits, just an additional way to get credits. Please review the information on this website by clicking on the different tabs to view an overview of the regulation and click on “regulation” to see the track changes of the amendments. <https://rules.sos.ri.gov/promulgations/part/415-00-00-1>

Amy C. Stewart, Esq.

Deputy Chief of Legal Services

Department of Business Regulation

<https://dbr.ri.gov/>

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---

**From:** Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbr.ri.gov](mailto:Dawne.Broadfield@dbr.ri.gov)>  
**Sent:** Friday, January 8, 2021 10:13 AM  
**To:** Marthe Rowen <[rowenmarthe@gmail.com](mailto:rowenmarthe@gmail.com)>  
**Cc:** Stewart, Amy (DBR) <[Amy.Stewart@dbr.ri.gov](mailto:Amy.Stewart@dbr.ri.gov)>  
**Subject:** RE: [EXTERNAL] : Re: NOTICE: Rhode Island - Proposed Amendments to Architect Regulations

Good Morning,

Questions/Comments should be forwarded to [Amy.Stewart@dbr.ri.gov](mailto:Amy.Stewart@dbr.ri.gov).

I copied her on this email.

Thank you.

---

*Dawne Breadfield*

**Rhode Island Department of Business Regulation**

**Division of Building, Design and Fire Professionals**

*[Board of Examination and Registration of Architects]*

*[Board of Examiners of Landscape Architects]*

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**From:** Marthe Rowen <[rowenmarthe@gmail.com](mailto:rowenmarthe@gmail.com)>

**Sent:** Friday, January 08, 2021 10:11 AM

**To:** Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbr.ri.gov](mailto:Dawne.Broadfield@dbr.ri.gov)>

**Subject:** [EXTERNAL] : Re: NOTICE: Rhode Island - Proposed Amendments to Architect Regulations

Hello

Thank you. Do I understand this proposed amendment to eliminate the current program of continuing education hours/credits available online through NCARB?

Marthe Rowen

On Fri, Jan 8, 2021 at 9:51 AM Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbr.ri.gov](mailto:Dawne.Broadfield@dbr.ri.gov)> wrote:

To Interested Parties:

Please be advised that the Rhode Island Department of Business Regulation is accepting written comments on its proposal to amend [415-RICR-00-00-1, Rules and Regulations for Architects](#). These amendments primarily involve recognition of NCARB's IPAL program and a continuing education credit for members of state architecture licensing.

Written comments should be submitted no later than February 7, 2021, to [amy.stewart@dbr.ri.gov](mailto:amy.stewart@dbr.ri.gov) or submitted on the on the [Secretary of State's Rulemaking website](#) under the "Comments" tab. The proposed amended regulation can be accessed by the links in this email or the Department's [website](#).

---

Respectfully,

*Dawne Broadfield*

**Rhode Island Department of Business Regulation**

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## Stewart, Amy (DBR)

---

**From:** Broadfield, Dawne (DBR)  
**Sent:** Monday, January 11, 2021 4:11 PM  
**To:** Peter Andruskiewicz  
**Cc:** Stewart, Amy (DBR)  
**Subject:** RE: [EXTERNAL] : Re: NOTICE: Rhode Island - Proposed Amendments to Architect Regulations

You're welcome.

---

*Dawne Broadfield*  
*Department of Business Regulation*  
*Division of Building, Design, and Fire Professionals*  
*560 Jefferson Blvd*  
*Warwick, RI 02886*  
*401.889-5446*

**From:** Peter Andruskiewicz <peteaarch@gmail.com>  
**Sent:** Monday, January 11, 2021 4:00 PM  
**To:** Broadfield, Dawne (DBR) <Dawne.Broadfield@dbr.ri.gov>  
**Subject:** [EXTERNAL] : Re: NOTICE: Rhode Island - Proposed Amendments to Architect Regulations

Thank you Dawne. I have no comments.  
Pete

On Fri, Jan 8, 2021 at 8:51 AM Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbr.ri.gov](mailto:Dawne.Broadfield@dbr.ri.gov)> wrote:

To Interested Parties:

Please be advised that the Rhode Island Department of Business Regulation is accepting written comments on its proposal to amend [415-RICR-00-00-1, Rules and Regulations for Architects](#). These amendments primarily involve recognition of NCARB's IPAL program and a continuing education credit for members of state architecture licensing.

Written comments should be submitted no later than February 7, 2021, to [amy.stewart@dbr.ri.gov](mailto:amy.stewart@dbr.ri.gov) or submitted on the on the [Secretary of State's Rulemaking website](#) under the "Comments" tab. The proposed amended regulation can be accessed by the links in this email or the Department's [website](#).

---

Respectfully,

*Dawne Breadfield*

**Rhode Island Department of Business Regulation**

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--

Peter Paul Andruskiewicz III, Architect  
121 Banta Lane, Boonton, N.J.  
C 201-317-0374 [Peteaarch@gmail.com](mailto:Peteaarch@gmail.com)



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## Stewart, Amy (DBR)

---

**From:** Broadfield, Dawne (DBR)  
**Sent:** Thursday, January 28, 2021 9:51 AM  
**To:** appletreeyard2@gmail.com  
**Cc:** Stewart, Amy (DBR)  
**Subject:** RE: [EXTERNAL] : Continuing Education credits

Mr. Mastroguseppe,

Any form of continuing education taken at any location to include in-person or online is accepted. The requirement is that you receive (and submit, if audited) a completion certificate after completion of the continuing education noting the hours and the health, safety and welfare (HSW) designation. A minimum of 12 HSW continuing education hours (CEHs) are required every calendar year.

Please do not hesitate to contact me with any questions any time.

---

*Dawne Broadfield*  
*Department of Business Regulation*  
*Division of Building, Design, and Fire Professionals*  
*560 Jefferson Blvd, Suite 100*  
*Warwick, RI 02886*  
*401.889-5446*

---

**From:** Stewart, Amy (DBR) <Amy.Stewart@dbr.ri.gov>  
**Sent:** Thursday, January 28, 2021 9:11 AM  
**To:** Broadfield, Dawne (DBR) <Dawne.Broadfield@dbr.ri.gov>  
**Subject:** FW: [EXTERNAL] : Continuing Education credits

Amy C. Stewart, Esq.  
Deputy Chief of Legal Services  
Department of Business Regulation  
<https://dbr.ri.gov/>

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**From:** james routledge <[appletreeyard2@gmail.com](mailto:appletreeyard2@gmail.com)>  
**Sent:** Tuesday, January 19, 2021 11:09 AM  
**To:** Stewart, Amy (DBR) <[Amy.Stewart@dbr.ri.gov](mailto:Amy.Stewart@dbr.ri.gov)>  
**Subject:** [EXTERNAL] : Continuing Education credits

Ms Stewart, Regarding the changes to the State's Architect regulations, may I receive a clarification? The CEH definition seems to suggest only in-person activities are acceptable to comply with the acquisition of 12 hours of CEH credit.

Presently,I receive written material in booklet form on the required Health Safety and Welfare subjects as course material, reading and instruction. Each course easily takes more than one to two hours or more to complete Each course is followed by a written exam of usually 30 questions to be returned by mail for grading ;and if one achieves a passing grade of 80% or better they receive a certificate. I find this remote learning method works best for my schedule and affords a more focused,detailed, in-depth approach. I hope you will retain this form of remote learning for CEH compliance. Please elaborate on qualifying ways to meet the proposed changes. Also,I hold a NCARB certificate and receive Courses/ tests from them as well. Will these written courses be eliminated from compliance? Best Regards Silvano Mastrogiuseppe,#1206 [appletreeyard2@gmail.com](mailto:appletreeyard2@gmail.com)



## ONLINE PUBLIC COMMENTS FOR REVIEW

Date: 02/08/2021

Regulation: 415-RICR-00-00-1

Title: Rules and Regulations for Architects

---

### Reviewed Comments

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**Comment ID:** 11237-90

**Comment By:** James Libby **On:** 01/08/2021

This comment is currently enabled for public display

#### **Comment:**

For architect continuing education compliance, it would be ideal if the state would accept an individuals American Institute of Architects Continuing Education Record as a means of compliance and to avoid an individual keeping duplicate records. Architects who are members of AIA maintain 18 continuing education requirements per year with a minimum 12 being in the area of Health Safety and Welfare. The AIA also keeps record of the member architects credit.

The following is text from another state that could be adopted for Rhode Island.

'The State Board of Registration for Architects and Landscape Architects board will also accept an official transcript from the AIA, which clearly indicates which continuing education courses have been attended by that licensee, the dates attended, and the hours earned, etc. All licensees will need to maintain copies of the official transcript for three years per the above cited code. Please note, that certificates or a transcript from the AIA will not need to be provided to the board until and unless that practitioner is audited by the board.'

Respectfully, James H. Libby, AIA

**Reviewed by:** Amy Stewart **On:** 01/11/2021

---

**Comment ID:** 11237-91

**Comment By:** Thomas Manning **On:** 02/06/2021

This comment is currently enabled for public display

#### **Comment:**

I agree with the comment by James H. Libby, AIA. However, not all architects are members of AIA and might not have a transcript available. I recommend that 1.8 C. 2 be somewhat more specific as to who is qualified to provide structured educational activities and what form of documentation would be acceptable. My suggestions:  
Qualified Organizations

- Any provider approved by the American Institute of Architects
- The International Code Council

- The National Fire Protection Association
- Any state offering similar training (Both Connecticut and New York offer training to code officials that would also be appropriate for architects.)

Acceptable Documentation

- AIA Transcript
  - Transcript or record from ICC, NFPA, or any state as above
  - Certificate of training from any qualified organization (such as a manufacturer)
- Without limiting it to the above. Thank you for your very reasonable approach to continuing education for architects.

**Reviewed by:** Amy Stewart **On:** 02/08/2021

---

**Comment ID:** 11237-92

**Comment By:** Jonathan M. Taylor **On:** 02/07/2021

This comment is currently enabled for public display

**Comment:**

AIA Rhode Island, Committee on Practice

5 Comments:

Item 1 (RE: 1.4 A) IPAL definition should not use "Program." The IPAL an initiative of NCARB is an optional path in a NAAB accredited program. As program is highly used for NAAB accredited programs, it should not be used in this context to avoid confusion. We suggest deleting the word program: "IPAL" means NCARB's Integrated Path to Architectural Licensure."

Item 2 (RE: 1.6 C) We suggest using model language from NCARB's legislative guidelines. We suggest the following instead, "The ARE® will be given to all applicants qualifying under R.I. Gen. Laws § 5-1-8, and to students actively participating in a NCARB-accepted Integrated Path to Architectural Licensure (IPAL) option within a NAAB-accredited professional degree program in architecture."

Item 3 (RE: 1.7 B3) No change proposed to this section; why is regulating the word "Associate" necessary?

Item 4 (RE: 1.8 D1) We offer two suggestions: 1) Close the out of state loophole, and expressly limit this self-reporting to the RI licensure board, not any jurisdiction, 2) Suggest extending this same self-reporting ability to architects serving on R.I. town/city zoning, planning boards etc... Without listing each of them, perhaps the State Board of Registration/Licensure of Architects could be allowed to maintain an approved list of public boards on which architects may serve and self-report HSW CEH.

Item 5 (RE: 1.8 J2) We suggest an AIA transcript be identified as acceptable method of documentation.

Proposed: "Forms may be audited by the Board for verification of compliance with these requirements. Documentation of reported CEHs shall be maintained by the architect for six (6) years from the date of award. A Rhode Island specific Continuing Education Transcript from The American Institute of Architects (AIA) is an acceptable form of documentation."

Thank you!

Respectfully, Jonathan M. Taylor, AIA - on behalf of AIA Rhode Island, Committee on Practice

<http://aia-ri.org/about-aia-ri/contact-us>

<http://aia-ri.org/get-involved/committee-on-practice>

**Reviewed by:** Amy Stewart   **On:** 02/08/2021

**Reviewed by:** Amy Stewart   **On:** 02/08/2021

## Stewart, Amy (DBR)

---

**From:** Broadfield, Dawne (DBR)  
**Sent:** Friday, January 8, 2021 12:51 PM  
**To:** Yash Mehta  
**Cc:** Stewart, Amy (DBR)  
**Subject:** RE: NOTICE: RE: [EXTERNAL] : NCARB RI policy for IPAL program

You're Welcome. Please do not hesitate to contact me any time.

I copied [Amy.Stewart@dbr.ri.gov](mailto:Amy.Stewart@dbr.ri.gov) on this reply as all questions/comments should be directed to her.

-----  
Respectfully,

*Dawne Broadfield*

**Rhode Island Department of Business Regulation**

**Division of Building, Design and Fire Professionals**

*[Board of Examination and Registration of Architects]*

*[Board of Examiners of Landscape Architects]*

560 Jefferson Boulevard – Suite 100 | Warwick, RI 02886

Phone: (401) 889-5446

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**From:** Yash Mehta <ymehta9795@gmail.com>  
**Sent:** Friday, January 08, 2021 12:29 PM  
**To:** Broadfield, Dawne (DBR) <Dawne.Broadfield@dbr.ri.gov>  
**Subject:** Re: NOTICE: RE: [EXTERNAL] : NCARB RI policy for IPAL program

Dawne,

Thank you for your email.

I am very appreciative to you and the Architect Board for your time, consideration and efforts to put this forward.

Best regards

On Fri, 8 Jan 2021 at 10:29, Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbr.ri.gov](mailto:Dawne.Broadfield@dbr.ri.gov)> wrote:

Yash Mehta on behalf of the Emerging Professionals group,

Please be advised that the Rhode Island Department of Business Regulation is accepting written comments on its proposal to amend [415-RICR-00-00-1, Rules and Regulations for Architects](#). These amendments primarily involve recognition of NCARB's IPAL program and a continuing education credit for members of state architecture licensing.

Written comments should be submitted no later than February 7, 2021, to [amy.stewart@dbr.ri.gov](mailto:amy.stewart@dbr.ri.gov) or submitted on the on the [Secretary of State's Rulemaking website](#) under the "Comments" tab. The proposed amended regulation can be accessed by the links in this email or the Department's [website](#).

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Respectfully,

*Dawne Broadfield*

**Rhode Island Department of Business Regulation**

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**From:** Broadfield, Dawne (DBR)

**Sent:** Monday, October 19, 2020 5:48 PM

**To:** Yash Mehta <[ymehta9795@gmail.com](mailto:ymehta9795@gmail.com)>

**Subject:** RE: [EXTERNAL] : NCARB RI policy for IPAL program

You're Welcome. Please do not hesitate to contact the Board any time.

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**PLEASE NOTE OUR NEW ADDRESS BELOW:**

*Dawne Breadfield*

**Rhode Island Department of Business Regulation**

**Division of Building, Design and Fire Professionals**

*[Board of Examination and Registration of Architects]*

*[Board of Examiners of Landscape Architects]*

560 Jefferson Boulevard – 1<sup>st</sup> Floor | Warwick, RI 02886

Phone: (401) 462-9594

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**From:** Yash Mehta <[ymehta9795@gmail.com](mailto:ymehta9795@gmail.com)>

**Sent:** Monday, October 19, 2020 8:14 AM

**To:** Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbri.gov](mailto:Dawne.Broadfield@dbri.gov)>

**Subject:** Re: [EXTERNAL] : NCARB RI policy for IPAL program

Good Morning Dawne,

I really appreciate your response and consideration of the board in this regard.

Thank you.

On Sun, 18 Oct 2020 at 13:29, Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbri.gov](mailto:Dawne.Broadfield@dbri.gov)> wrote:

Good Afternoon,

The Rhode Island Board of Examination and Registration of Architects ("Board") is taking your request under advisement.

Please do not hesitate to contact the Board any time.

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Thank you,

**PLEASE NOTE OUR NEW ADDRESS BELOW:**

*Dawne Broadfield*

**Rhode Island Department of Business Regulation**

**Division of Building, Design and Fire Professionals**

*[Board of Examination and Registration of Architects]*

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**From:** Yash Mehta <[yashmehta9795@gmail.com](mailto:yashmehta9795@gmail.com)>  
**Sent:** Monday, August 31, 2020 4:15 PM  
**To:** Broadfield, Dawne (DBR) <[Dawne.Broadfield@dbri.org](mailto:Dawne.Broadfield@dbri.org)>  
**Cc:** Nicole Hetherington <[nhetherington@z-ds.com](mailto:nhetherington@z-ds.com)>  
**Subject:** [EXTERNAL] : NCARB RI policy for IPAL program

Hello Dawne,

I hope this email finds you well.

I Yash Mehta, am an Assoc.AIA member and a part of Emerging Professionals Network of AIA Rhode Island. I am writing this today on behalf of the Emerging Professionals group to learn about the state's policy for the IPAL program.

As a part of our EP August meeting, we discussed the IPAL program and the ways in which it can be helpful to students to jumpstart their career and bridge academic learning with its professional implications. As displayed on NCARB website the state of Rhode Island currently does not accept students graduated through IPAL program And their divisions of ARE cleared under IPAL program. Whereas other states from the region have started adapting to the same. If we could also adapt the same renowned architecture schools of the region may also be able to strengthen students further by incorporating the program.

As the Emerging Professionals group is actively exploring ways to help young individuals become professionals, we believe any positive change in this direction would be of immense benefit. And some of us would be more than happy



to work with you and other experts from the field in this regard.

I appreciate your time and consideration. I would be looking forward to hearing your opinion regarding the above.

Best

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[Yash Mehta \[archinect.com\]](mailto:Ymehta9795@gmail.com)

Assoc. AIA

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