

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: January 4, 2022

FROM: Michael A. Morrell
Acting Administrative Rules Director

AT (OFFICE): Legislative Services

SUBJECT: Final Proposal 2021-107

To: File

Attached are Kim Reeve's comments on Final Proposal 2021-107 from the Board of Architects (Board) relative to the repeal and readoption with amendment of various rules in Arch 300, the readoption with amendment of Arch 401.05 and Arch 403.04, and the adoption of Arch 403.09.

Most of the substantive comments relate to the public interest due to lack of clarity as noted, and therefore to legislative intent due to the potential for oral rulemaking in violation of RSA 541-A:22, I. There is also a comment on page 5 relative to a potentially inadequate fiscal impact statement (FIS).