



February 24, 2026
Senator Brian Feldman
Chair, Education, Energy, and the Environment Committee
2 West Miller Senate Office Building
Annapolis, MD 21401

RE: Letter of Support
SB 0653 State Board of Architects - Grounds for Discipline - Requirements

Dear Chair Feldman and Members of the Committee,

As a board member representing over 2,000 architects, on behalf of AIA Maryland, I write to express strong support of Senate Bill 0653, which requires the State Board of Architects to take action for a licensee under certain circumstances, and it expands to include situations when an individual misrepresents that they hold a license or permit.

While the chance for misrepresentation may have existed prior to electronic filing of documents, the rate of identity theft has increased with the expanded use of the internet and electronic document transfers. Unauthorized use of architectural plans or unauthorized use of seals and signatures through e-filing of documents for a building permit may make it easier to be mis-represented and get documents approved for permit, if there is not a step of verification before a permit is issued. We are strongly behind this legislation for two key reasons.

- First, for public safety to help protect others from potential malfeasance of individuals posing as an architect without proper training and credentials. Our professional obligation is to help protect the health, safety and welfare of those who occupy the buildings we create, and an untrained individual, may not be aware of, or could even consciously ignore aspects of design that could put the public at risk
- Second, we wish to help protect our members, who may unknowingly have their identities stolen and used to obtain a building permit for a project they had no role in reviewing and preparing documents. This can subject our architect members to need to defend against claims or issues that they had no part in.

Cases of misrepresentation as an architect have happened in Maryland and this proposed legislation proactively takes steps to prevent future offenses of misrepresentation as a licensed architect.

We assessed how all 50 states, the District of Columbia and U. S. territories regulate architect seals and stamps, with a specific focus on fraudulent use prevention, digital/electronic seal requirements, enforcement mechanisms and penalties. The key findings of our search are summarized below.

- All states treat fraudulent seal use as a professional misconduct subject to board discipline.
- Penalties range from reprimands and fines (\$500 -\$5,000 per violation) to license suspension/revocation.
- At least 15 states impose criminal penalties (typically Class 2 misdemeanor) for unauthorized practice or seal misuse.
- Electronic/digital seal regulations vary significantly from state to state. Most states allow but do not mandate cryptographic digital signatures.
- Plan stamping (sealing work not prepared or supervised by the architect) is universally prohibited.
- Mandatory reporting to boards upon seal loss, theft, or compromise is required in at least 20 states.

Many jurisdictions allow and in a number of cases even rely upon expeditors for filing documents for permits, but some states and jurisdictions take proactive action to protect or verify electronic seals are valid and used by the professional responsible for them. Methods of verification vary among states ranging from high requirements on electronic seal framework, to directly contacting the licensed architect to verify if they were the ones filing documents for a specific permit. We believe that direct contact with the professional may be the most effective means of validating that the architect is aware of permit filing and was indeed responsible for preparing documents for submission. Replication of valid appearing documents and even outright use of the actual documents without the architect being aware of this is more easily created with multiple means of making documentation appear credible. Direct contact with the design professional as proposed in

this legislation is a process followed in our neighboring jurisdiction of DC, and we believe it is an effective means of confirming that the correctly qualified party did indeed file the documents. Additionally, architects are often particularly aware of communications from jurisdictional plan review authorities. Whether phone call or electronic communication is a path of notification, we believe this an effective check on an electronic plan filing system.

Our members of AIA Maryland have all worked exceptionally hard to gain the training and complete the testing and continuing education requirement to help protect the health, safety and welfare of inhabitants of buildings we design here in Maryland. This legislation takes a step to protect residents from someone falsely claiming to be an architect and submitting plans for construction, and it requires the State Board to take action against someone who may do this. We ask for your support of SB0653 to affirm these means of making building in our state a safer, more secure process.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. R.' with a long horizontal line extending from the 'R'.

Chris Parts, AIA

Director, Past President, AIA Maryland