

# FLORIDA BUILDING COMMISSION



## BUILDING CODE SYSTEM ASSESSMENT SURVEY II RESULTS

### REPORT TO THE FLORIDA BUILDING COMMISSION

*APRIL 5, 2011*



CONSENSUS CENTER

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FLORIDA BUILDING COMMISSION  
BUILDING CODE SYSTEM ASSESSMENT  
SURVEY II RESULTS REPORT

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## FLORIDA BUILDING COMMISSION

### BUILDING CODE SYSTEM ASSESSMENT SURVEY II REPORTS

#### I. PROJECT OVERVIEW

**Triennial Report to the Legislature.** Florida Statute, Chapter 553.77(1)(b), requires the Commission to make a continual study of the Florida Building Code and related laws and on a triennial basis report findings and recommendations to the Legislature for provisions of law that should be changed. The Commission conducted the first assessment in 2005, and during 2010 the Commission again solicited stakeholder input in the form of an on-line survey (conducted from June 25 – August 30, 2010), and at the October 2010 meeting the Commission voted to conduct a comprehensive evaluation of the Building Code System. The Commission decided to conduct an expanded survey running from June 2010 through January 2011 and to use the results as one of the inputs for developing a package of recommendations for enhancements to the Florida Building Code System (the Code, the Commission, local administration, compliance and enforcement, and product evaluation and approval).

The chair appointed an ad hoc committee of Commission members to review the results of the Building Code System Assessment Surveys (I and II) and develop recommendations for the Commission regarding any proposed changes to the Building Code System. This will be a facilitated consensus-building process and the Ad Hoc met for the first time at the October 2010 Commission meeting, and the Commission will consider the Ad Hoc's recommendations at the December 2011 meeting for inclusion in the Report to the 2012 Legislature.

#### II. FLORIDA BUILDING CODE SYSTEM OVERVIEW

In 1997, the Governor's Building Codes Study Commission recommended that a single state-wide building code be developed to produce a more effective system for a better Built Environment in Florida. It was determined that in order to be effective, The Building Code System must protect the health, safety and welfare of the citizens of Florida, and in doing so:

1. Be simple to use and clearly understood;
2. Be uniform and consistent in its administration and application;
3. Be affordable; and
5. Promote innovation and new technology.

The Study Commission determined that an effective system must address five key components: the Code, the Commission, code administration, compliance and enforcement, and product evaluation and approval.

#### **The Florida Building Code System is Comprised of Five Essential Components. A Summary of Each Follows:**

**1. The Florida Building Code and the Code Development Process.** Historically the promulgation of codes and standards was the responsibility of local jurisdictions. It was determined that Florida's system is "a patchwork of codes and regulations developed, amended, administered and enforced differently by more than 400 local jurisdictions and state agencies with building code responsibilities". A critical component for an effective building code system was to develop and implement a single state-wide code.

The purpose of developing a single state-wide building code was to:

1. Serve as a comprehensive regulatory document to guide decisions aimed at protecting the health, safety and welfare of all of Florida's citizens.
2. Provide uniform standards and requirements through the adoption by reference of applicable national codes and providing exceptions when necessary.
3. Establish the standards and requirements through performance-based and prescriptive based criteria where applicable.
4. Permit and promote innovation and new technology.
5. Require adequate maintenance of buildings and structures, specifically related to code compliance, throughout the State.
6. Eliminate restrictive, obsolete, conflicting and unnecessary construction regulations that tend to increase construction costs unnecessarily or that restrict the use of innovation and new technology.

The new Florida Building Code is a state-wide code implemented in 2001 and updated every three years. The Florida Building Commission developed the Florida Building Code from 1999 through 2001, and is responsible for maintaining the Code through annual interim amendments and a triennial foundation code update.

**2. The Commission.** The Commission is an appointed representative stakeholder body that develops, amends and updates the Code. The Commission is comprised of members representing each of the key interests in the building code system. The Commission meets every six weeks and in addition to their code development responsibilities, regularly consider petitions for declaratory statements, accessibility waiver requests, the approval of products and entities, and the approval of education courses and course accreditors. The Commission also monitors the building code system and reports to the Legislature annually with their recommendations for changes to statute and law.

**3. Local Administration of the Code.** The Study Commission recommended, and subsequent legislation maintained, that the Code shall be administered and enforced by local government building and fire officials. The Commission has certain authorities in this respect such as the number and type of required inspections. However, the Commission's main responsibility remains amending the Code, hearing appeals of local building officials decisions, and issuing binding interpretations of any provisions of the Florida Building Code.

**4. Strengthening Compliance and Enforcement.** Compliance and enforcement of the Code is a critical component of the system with the Commission's emphasis in this regard is on education and training. The Study Commission determined that in order to have an effective system a clear delineation of each participant's role and accountability for performance must be effected. There should be a formal process to obtain credentials for design, construction, and enforcement professionals with accountability for performance. Opportunities for education and training were seen as necessary for each participant to fulfill their role competently. Although many of the Commission's functions related to education were recently assigned to a legislatively created Education Council, education remains a cornerstone of the building code system. The Commission remains focused on the approval of course accreditors and the courses developed/recommended by approved accreditors.

**5. Product Evaluation and Approval.** In order to promote innovation and new technologies a product and evaluation system was determined to be the fifth cornerstone of an effective Building Code System. The product approval process should have specific criteria and strong steps to determine that a product or system is appropriately tested and complies with the Code. Quality control should be performed

by independent agencies and testing laboratories which meet stated criteria and are periodically inspected. A quality assurance program was also deemed essential. The Commission adopted a Product Approval System by rule and currently approves products for state approval and product approval entities. Local product approval remains under the purview of the local building official as a part of the building permit approval process.

## **ADDITIONAL KEY BUILDING CODE SYSTEM PROGRAMS**

**A. Building Code Information System.** The Building Code Information System (BCIS) was developed in early 2000 to implement the new responsibilities, business practices, and automated systems required by the Florida Building Code. The BCIS is a multi-functional database that provides building professionals, the general public, local governments, and manufacturers with single-point access to the Florida Building Code, Manufactured Building Program, Product Approval System, Prototype Program, local code amendments, declaratory statements, nonbinding opinions, and the interested party list. Since its initial deployment, significant new functionality has been added to the BCIS in response to new legislation and to accommodate the changing needs of the Commission and DCA. The amount of information now available via the BCIS has more than doubled in the last four years; the number and type of users has correspondingly increased as new needs are addressed. The web site has become more complex and more difficult to locate needed information. As a result, the Department is in the process of updating the BCIS to address the overall accessibility of information contained within the BCIS.

**B. Manufactured Buildings Program.** Chapter 553, Part I, FS, known as the Manufactured Buildings Act of 1979, governs the design, plans review, construction and inspection of all buildings (excluding mobile homes) manufactured in a facility to ensure compliance with the Florida Building Code. Rule Chapter 9B-1 FAC was subsequently adopted by the Commission to adequately govern the program and to ensure that manufacturers and independent Third Party Inspection Agencies maintain performance standards. Inspections agencies qualified under this program and serving as agents for the State, provide construction plan reviews and in-plant inspections. All manufacturers and Third Party Agencies are monitored at least once per year to ensure quality assurance and adequate code enforcement. Manufactured Buildings approved under this program are exempted from local code enforcement agency plan review except for provisions of the code relating to erection, assembly or construction at the site.

**C. Prototype Buildings Program.** Chapter 553.77(5) F.S., Rule 9B-74 Prototype Plan Review and Approval program. The plans review program was developed by the Florida Building Commission to address public and private entities such as buildings and structures that could be replicated throughout the state. This program is conducted by an Administrator delegated by the Commission, this Administrator has qualifications to review plan compliance with the Florida Building Code and certified per the requirements of Chapter 468, F.S. The program Administrator contracts with qualified plans examiners to review Prototype plans for Code compliance with the Florida Building Code and Florida Fire Prevention Code, these plans examiners are certified in Chapter 468 or 633 F.S., or both Chapters 468 and 633, F.S. The prototype plans are reviewed for completeness in a timely manner compliant with Chapter 120 F.S.. Each approved Prototype plan is issued an identification tracking number, this number is used to track replicated plans to local governments. The Administrator regularly attends the Florida Building Commission and reports on the progress of the Prototype Buildings Program.

**D. Alternative Plans Review and Inspections—Private Provider System for Plans Review and Inspection Functions.** §553.791, Florida Statutes, was created in 2002 to allow property owners to utilize

the services of a private interest to perform plan review and/or inspection services in lieu of, but subject to review by the local permitting authority. The legislation creating the process also directed the Commission to review the system and report the results to the legislature which was accomplished in the Commission's 03-04 report. In addition, the Commission as a result of a consensus stakeholder process convened in 2004, proposed, additional refinements to the system in the Commission's 04-05 report. In 2005 the Florida Legislature adopted a package of refinement to the system which were signed into law in the summer of 2005.

**E. Interaction and Coordination Between the Florida Building Code and Other State Based Building Construction Regulations.** The Florida Building Commission is committed to coordinating with other State agencies charged with implementing and enforcing their respective State based building construction regulations. The Commission only has authority to amend the Florida Building Code and respective rules, and other state agencies have similar authority for their respective rules and regulations. The Commission has worked closely with other state agencies to ensure consistency and coordination between the various codes and rules.

**F. Enforcement of Other State Based Building Construction Regulations at the Local Level.** Enforcement of state agency regulations occurs primarily at the local level under the jurisdiction of the respective agency's local officials. Regulations should be clear and consistent across the State, and coordination is required between the Florida Building Code's and other agency's requirements.

### **III. OVERVIEW OF SURVEY DESIGN**

The survey was designed to solicit input on the five key components of the Building Code System: the Code, the Commission, administration of the Code, compliance and enforcement (education), and product approval. In addition, comments were solicited for four key Building Code System programs: the Building Code Information System, the Manufactured Buildings Program, the Prototype Buildings Program, and the Private Provider System. Finally, comments were solicited for two additional aspects of the System: interaction and coordination between the Florida Building Code, and other state based building construction regulations and enforcement of other state based building construction regulations at the local level. The first survey (2010) ran from June 25, 2010 through August 30, 2010, and there were 85 respondents. The second survey ran from June 2010 through January 28, 2011 (includes results compiled from both surveys) and there were 324 respondents.

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The survey responses were compiled and shared without any attribution to individual survey respondents. The survey results will also serve as a component of the input for the Building Code System Assessment Ad Hoc Committee's recommendations.

The survey results are not statistically valid since the respondents self-selected to complete the survey, and were not part of a statistically valid survey sample design. The survey results represent only the views of those that responded to the survey, and do not reflect balanced representative stakeholder perspectives of the Building Code System.

Comments that were not responsive to the question, or indicated an unfamiliarity with the program/function were discarded.

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#### IV. RESPONDENT DEMOGRAPHICS

Respondents represent the following segments of the Building Code System/Industry:

Representation	Number of Survey Respondents
	<b>Total Number of Survey Respondents*: 324</b>
Architects	52
Building Officials/BOAF (plans examiners, inspectors, administrators)	71
Building Suppliers	2
Consultants (code, private providers and unspecified)	17
Contractors: Electrical	3
Contractors: General	7
Contractors: Home Builders/Associations	12
Contractors: Mechanical	1
Contractors: Plumbing	2
Contractors: Roofing	1
Engineers	16
Fire Officials	97
Florida Building Commission	15
General Public	9
Lawyers	2
Local Government (Planners)	21
Product Manufacturers/Associations	9
Public Education/School Boards	20
State Government/Agencies	3
Testing Services/Labs	1
Unattributed	7

*\*The number of survey respondents by representation exceeds the total number of survey respondents since some respondents represent multiple representations/stakeholder groups.*

## SUMMARY OF SURVEY RESULTS

For each of the five components, four programs, and two coordination functions respondents were asked to evaluate how well they were functioning on a 5-point scale, where 5 corresponds to very well and 4 through 1 for progressively less well. In addition, for each of the components and programs evaluated, respondents were requested to identify what is working well and what is not working well, and to offer their specific recommendations for enhancements.

**Ranking Scale:** ⑤=Very well to ①=Less well

### V. FLORIDA BUILDING CODE SYSTEM

*(3.6 Average)*

How has the Florida Building Code System functioned generally since implementation of the 2001 Florida Building Code—from your perspective, on balance how well have the goals of the System been achieved? *(Scored 3.6 out of a possible 5.0)*

Ranking Scale	5	4	3	2	1	Average
Total	44	144	88	28	11	3.6

#### 1. What is working well with the Building Code System.

- Opportunity in an open forum for all interested parties to be a part of a consensus process.
- It has helped in uniform enforcement over the entire state. While there still is different interpretations from time to time the declaratory statement, formal interpretation and informal interpretation process is outstanding.
- We use the international codes as our base and we have generally held the line with consensus throughout the entire United States.
- Clarifications are getting better
- Uniform adoption and standardization of building codes has improved immensely.
- The updates of the code responding to actual events in the industry.
- The implementation of a Statewide building code, even with various jurisdictions making amendments.
- Florida has special concerns for Hurricanes and a higher proportion of elderly/wheelchair/ADA residents/visitors; however, this could be dealt with as some kind of nation-wide regional table like a wind-speed map or age demographic map.
- Numerous reported additions and documentary to amend the current codes.
- Much of the basic code relies on the model code.
- Storm preparedness wind load design requiring licensed professionals for permit docs ADA criteria.
- I believe it properly addresses the need for proper hurricane protection.
- The various codes are beginning to be properly coordinated and conflicts removed.
- Is more realistic and clear at the Plumbing Section. Has too many divisions at the Building section (Existing Buildings, Residential, Building). On ADA which I believe is absolutely necessary the standards has to be restudy especially handicap parking allowances.
- Uniformity throughout the state has been improved.
- The Florida Building Code is, to a large degree, paralleling the International Codes.
- Good for FL to have control of its own code. Don't know if having the IBC as the "base code" is a good thing. Just look at the "residential fire sprinklers" debacle that just happened and it was only because FL was forced to accept the IRC base code conditions and could then modify them on their own.



- Having the Code available on disk is extremely valuable. It saves time and aids in finding Code issues. The current Code is substantially more definitive and complete. Cross referencing and definitions are better. Including ADA and Life Safety issues in the Code is good.
- Code change process, declaratory statement process, product approval process.
- Knowing that requirements will continue to increase costs.
- It is keeping up with necessary changes.
- The way the code is separated into sections of building designs and creating a good set of definitions.
- Locally there seems to be more openness in the process.
- Everything is working well.
- Standardization across the state.
- More people obtaining licensing in multiple or all category's.
- Codes are very applicable to the physical environment in the state re: resistance to weather conditions, stability, etc.
- Organization of the code and its availability electronically.
- Specific details on wind loads.
- They are using the ICC codes as a base.
- Statewide acceptance of the approved products.
- I have found the information presented in a clear and efficient manner and easy to follow when more information needed.
- With respect to the product approval system, it is too easy to download drawings for permit purposes and then modify them to suit your needs. Technology today allows for the modification of drawings and text, in such a manner that only signed and sealed originals insure that what was approved by the FBC process is actually the drawings being used for permit. Cost rather than Quality control seems to be the guideline that is followed.
- The Building Code is available online.
- Having advisers that are hands on in their areas of code review.
- Regular updates.
- The continuance of adjusting the code with the International code.
- It is great for looking up products that are approved.
- Frequency of updates, Florida is improving their building code to keep up with energy efficiency.
- Code development cycle except for the glitch cycle which had arbitrary rulings on whether a change was a glitch or not. Enforcement of structural provisions Commission meetings are well run, open, and fair.
- Ability to access the Code online - at least for primary/registered users.
- Resilience, understandable.
- The ability to access code change proposals is a wonderful system. Hats off to the staff for really getting this working this last cycle and continuing to improve it.
- Keeping information on updates and revisions flowing.
- Ongoing technical review of the codes and standards and their application state-wide.
- One and two family code.
- Most of the interaction with the Florida Fire Prevention Code.
- The Codes if enforced would provide for a reasonably safe functioning structure
- Uniformity with fire code matters.
- The code works fine and should be left alone once it has been printed and adopted. The glitch amendments need to be put into the next upcoming code change instead of constantly putting out amendments. This is what upsets the balance of enforcement of the code.
- The spirit of the law is very good.
- Attempt to standardize codes.
- All the hurricane requirements seem to be accepted and changes have stopped.

- The main objective of making the buildings safer is working well.
- The ability to centralize all standard requirements for the construction industry in one Code that applies to all of Florida's jurisdictions is an invaluable tool for architects.
- As there have been more buildings built in the years since the adoption of the new building codes, there appears to have been far less personal or property loss from storms, fires, etc. This, to me, is by far the greatest triumph of building codes.
- Product Approval System.
- The idea of a consistent and applicable code.
- What is working well is that the Code has improved in resistance to wind design and mitigation of the effects of hurricanes. The Code's primary necessity is to insure the health, safety and welfare of the public. Some of the changes have done that. Others are knee-jerk reactions to one or two incidents that are now Code mandates. For instance FS 633.027 in its intent is good. The amount of time for compliance by local jurisdictions is incredibly short sighted.
- Similarity to the IBC is useful but can be misleading to out of state professionals.
- Reasonable but outdated tie-in to the IBC.
- Ready source for building code requirements.
- There is now a consistent code throughout the state that allows for common requirements throughout the state.
- Owners comfort level is higher by the knowledge that a home has been inspected by a separate jurisdiction.
- The code requirements themselves are being maintained well with adequate work on special Florida interests to develop effective criteria with full participation of stakeholders.
- Compatibility with the Florida Fire Code.
- The fact that all parties can be heard and their requests are considered by well qualified people.
- The overall uniform application of the code.
- It blends in well with the FFPC and at times provides greater life safety.
- New construction.
- All of it.
- Most sections are very clear.
- General administration, code updates, information, web-site ease of use, access to state-wide product approvals. On line access to past and current FBC editions.
- The code is more in tune with the Florida Fire Prevention Code. I say this with a premise of a positive working relationship with the Building Official who will agree that the most stringent applies between the FBC and FFPC.
- The new web interface for the building code development process is wonderful. Much better cooperation and communication between industry, contractors, designers, building officials and fire marshals. Better consistency in interpretations of the code.
- Uniformity from jurisdiction to jurisdiction.
- Plan review seems to be thorough and fairly quick. Good cooperation between building and fire officials at the local level.
- The system has brought uniformity to most areas of the state. The joint Committees responsible for eliminating conflicts with the Building and Fire Codes have helped in reducing on the job conflicts.
- Separation of Building and Residential Codes.
- The building Departments use it in spite of it being behind the base code by years and never coming in on time.
- Using International Code and NFPA 101 as basis.
- More consistency than ever before in use of the same code by law!
- Uniformity.

- The balancing between the Fire Code and the Building Code.
- Fire suppression systems and fire codes.
- A code that is the same from jurisdiction to jurisdiction with limited local amendments.
- Both the Building Code and Fire Code have become a more cohesive matching document helping get rid of the multiple previous existing conflicts.
- It is eliminating conflicts with the FFPC.
- Generally even enforcement.
- It appears that the building code is becoming more compatible with the fire codes which is a big help in the construction process.
- Consistent code application.
- Ensures that there is a safety net that buildings are constructed to the Building code.
- One unified code for the entire state.
- Having the fire department reviewing plans. --Alan Carter, Fire Marshal/ Fire Codes
- Over all the system has been well balanced.
- Alignment of the building code and the Fla. Fire Prevention Code in areas of fire and life safety.
- I feel the building code has improved on Fire Safety standards.
- Use of national, consensus standards, including the ICC family of codes.
- It needs to take serious the life safety requirements and not allow the fox to guard the hen house.
- Uniform code requirements throughout the state.
- Meshes with the Florida Fire Prevention Codes well.
- I feel both the building code and fire code have made significant gains in aligning the life safety issues of both codes.
- The TAC committees have begun the process of coordinating the requirements of the Florida Building Code and the Florida Fire Prevention Code, however, more work is required in some areas. Fire and Building Code officials are working more closely than ever to provide a coordinated review and provide safer buildings for the public.
- The Building code provides for minimum standards that provides the public a fair level of safety and security.
- Working in conjunction with the Florida Fire Prevention Code.
- Increased code knowledge by the construction industry as a whole, has led to more code compliance and safer buildings in our state.
- Clarity of requirements (commentary is often useful) and general organization.
- Plan review and inspections.
- It is working very well because everybody is looking at the same code book for guidelines.
- The Building Code and the Fire Prevention would have worked well IF we had let the first edition operate as a test prior to allowing amendments. Constants was what we where working toward.
- Similarities with safety of citizens through both the FBC & FFPC.
- Uniform requirements between Building and Fire Prevention code. Active efforts to address and/or eliminate conflicting code requirements equals better code management for all concerned.
- Buildings are being constructed and safe.
- Use of International codes.
- The building code is being continually correlated with the fire codes, reducing conflicts and resolving differences.
- The cooperation between the Florida Building Code and Florida Fire Code has made a difference in a well balanced system. Better code compliance.
- I especially like the continuity, for the most part, between the FBC, the ICC and lack of local only amendments. I'd like to see less local amendments for the FFPC and limit the ones we do have to those that are strictly unique rather than simply local preference.

- Attempts to coordinate building codes with fire and life safety codes.
- It is understandable, and easy to research items in the doc.
- A unified code for the state is good! Get the State Fire Marshal out of the adoption of competing codes, like the life safety code...it just complicates the system. 90 % of the life safety code is a building code. Also, get the fire inspectors out of the building code enforcement business...they have too much autocratic power and 'enforcement by intimidation' is rampant!
- Increased wind protection and fire protection.
- The opportunity for uniform enforcement exists.
- It is ahead of the national average on energy efficiency; a high quality code, providing well for the needs of the state.
- Somewhat consistently interpreted technical codes.
- It is readily available and well written.
- It is more inline with the Uniform Code which is easier to understand. Also it ties in better with other referenced codes and standards.
- Integration of other Florida building requirements such as SREF.
- The delivery of the same requirements to all buildings.
- It has resulted in improved and safer facility construction throughout the public sector.
- Multiple meetings and committees.
- It is great to know that the code is uniform regardless of what location in the state you are performing the work.
- Better built buildings.
- Consistent application letting professionals know the rules and regulators knowing what to enforce for the benefit of the people of Florida.
- Coordination of issues.
- The Florida Building Code itself.
- Communication is getting better. Online access to documents and information is getting better. Consistency is getting better.
- Its there!
- Alterations to buildings. I like level 2 & 3 will be considered new construction.
- Availability on line.
- More consistency.
- The code is tailored to the needs of Florida and how we need to deal with frequent hurricane threats.
- Nothing!!!! The system is broke.
- The alignment with the Fire Codes and the BOAF training.
- Nothing. It is onerous and excessively complicated and has become insanely restrictive.
- I think the requirements for high velocity hurricane areas are improving the overall construction standards.
- We have a building code for Florida, but it is 2 years behind the National Code from ICC.
- The Florida-specific changes incorporated into the code are more convenient to use than to adopt the ICC codes, as published, with Florida-specific supplements. Supplements would require adding annotations or marginal notes to identify the Florida-specific changes. Changing the base code to be consistent with the codes, such as the Florida Fire Prevention Code, is important to avoid unnecessary costs is important for building owners.
- Public accessibility to the current code.
- Consensus code development process.
- Public input to process.
- Industry Representation.
- Product Approval.

- The division of disciplines.
- All is well, yet what in Florida could possibly be different from the rest of our great nation.
- Easily obtainable information online and searchable.
- Many codes have been matched up with the requirements of the FFPC, allowing for less conflict. (Although there will always be the human element of interpretation).
- Uniform standards throughout the state.
- A general attempt to have all codes inter-connected when possible (i.e. the Mechanical often refers back to the Building Code or vice-versa to recognize that all disciplines ultimately affect code enforcement and interpretation).
- One state wide building code.
- Where it has been brought into alignment with the Florida Fire Prevention Code it has been successful.
- With the basis of the IBC the FBC now parallels the Fire codes in most instances, making for a more uniform and harmonious review.
- I think that having one Building Code for implementation and enforcement throughout the State of Florida is a beneficial and the right approach instead of having different codes.
- Easy to use and staying consistent by not changing model code issuer.
- Minimal structural damage during tropical events due to implementation and enforcement of the FBC.
- A willingness to debate conflicts and resolve them for the safety of the public.
- One Code not four! Generally, a buy-in by local government building officials.
- The built environment is more ready to withstand hurricanes.
- Nothing.
- Design Pressure Requirements. Currently have good defined understandable design wind speed lines and design pressure requirements. People and Code Officials can know what is required because it is in black and white. Sounds like this may be changing.
- The focus on structural elements and enforcement has been excellent.
- Building officials, building inspectors, contractors, and home owners have a uniform code that can be referenced at any point that discrepancies occur.
- The code development process as a whole.
- Greater consistency - not quite there much closer. Coordination between building and fire never been better.
- Making buildings safer, getting building departments very active helping contractors apply the code.
- The ICC based code is a good one.
- In my jurisdiction the working with the building official and fire official has worked well.
- We have eliminated many of the conflicts between the Building and Fire Codes.
- Incorporates wind provisions of ASCE 7.
- Unified standards for the state.
- Most of the building code is working well.
- Maintaining a uniform code.
- Most codes appear to be in line with the FFPC.
- One set of codes is a lot better than each jurisdiction adopting their own.
- Generally, the state has the same code at the same time.
- The online updates to the FBC and general availability of the FBC online. In addition the DCA clarifications that are accessible. The FBC system, in general, functions well with respect to permitting, plan reviews, enforcement etc.
- Most areas if the state are applying the code evenly across jurisdictions.
- Some of the code changes have become more practical and overall better for the safety and welfare of the building owners.
- The "existing building" code is a great help in making decisions on remodeling.

- Most part the sections of code that match the Florida Fire Prevention Code.
- As with all codes, they consistently change and we need to be updated on changes. Technology, new products, increases our need to safe guard the public from safety hazards that endanger life and property.
- the entire state has the same code with the exception of HVHZ.
- Unified statewide code (except for HVHZ). Transition smooth between 2001, 2004 and 2007 code changes.
- We are on our way to achieving a unified code in Florida.
- Certainly the end product of construction has become safer since the implementation of the system.
- Relatively consistent technical code implementation.
- Although it's far from perfect there's more uniform enforcement throughout the state than before the Florida Building Code. Also DCA staff is very accessible and helpful to Building Departments unlike DBPR.
- The building code system has done well addressing the specific needs of the State of Florida.
- Table of contents, definitions, index, and BCIS easy to navigate.
- The code format is good. It is all in what you get used to. Making changes to the format is not good. The references to other codes is very helpful, otherwise we may not know there is a more stringent code.
- In my experience with plan review as a fire marshal, I have had good success partnering with Manatee County Building Department. For the most part, I have found the FBC and FFPC are complimenting each other.
- The electronic access is helpful.
- One Statewide code is a positive.
- We have a unified Building code.
- The parts that are working well are that the Florida specific items, which are exclusive to Florida and Florida alone are being addressed during the BCS process. Adoption of a National Code would not work in Florida because of the particular items which are Florida's and Florida alone i.e. humidity, hurricanes etc.
- The overall code, is lengthy, generally. But what you are looking for is in the code.
- After all of the revisions are completed the building code system seems to be seamless in most cases.
- The same code is employed State-wide.
- We at least have a code to use.
- That rules are in place and enforceable with respect to building safer buildings.
- Only one section completed on this survey; that being the last. Thank you.
- keeping uniform with the International Codes is very effective.
- Information is readily available and understandable.
- Keeping the industry up to date with current modifications.
- The building code has done a good job of insisting that hurricane resistant construction is being designed. This needs to be added to College Curriculum. Mold, humidity and water penetration regulations need to be added to the code. This is a big problem along seacoasts.
- The online availability makes it accessible to everyone. The search engine for FL Approved products also works well.
- I like the idea of a statewide system with definable criteria for all locations.
- It is easy to find what you are looking for and quite easy to interpret.
- An overall improvement of quality of construction for consumer.
- It is currently working toward a more uniform system that does not change so often. It remains to be seen.
- The communication between building departments is working well related to trying to understand the holistic purpose of the code is working well. I have been a building official since 1986 and have seen the State of Florida come together and put together an organized uniform code system.

- It closely follows the changes in the original ICC codes so we benefit from that process.
- Buildings now have a standard to which they can be built, based on location, usage and size.
- The providing of a State Wide Building Code.
- The Building codes are becoming more in line with balance fire protection.
- The basic IBC elements work well, modifications to those do not.
- I believe that the more stringent hurricane requirements have served the state well.
- The system creates an enormous amount of junk paperwork that has not appreciable created safer buildings since the 1950's,
- Balancing the Fire and Building Code requirements.
- Improvement on previous Code.
- Uniformity throughout the State.
- Provides statewide uniformity and some stability.
- the Residential building code working, modernly well but the Electrical portion of Florida, must in line with ICC, built into the code book. The ICC code book has a chapter section 33 for the use of residential Electrical. This is the guideline for which Florida residential building code needs to be corrected. Even though all of the code are pulled from the NEC standard. This will simplify the desire of inspectors wanting or trying to apply commercial code to the Residential Industry.
- Code differences between the FBC and the FFPC are narrowing. The gap is now very manageable with a little effort.
- It is addressing issues mandated by the legislature or State agencies, making it easier to locate those requirements. - It is coordinating more closely with the Florida Fire Prevention Code, reducing conflicts between the two and easing compliance by design professionals. - Topics common to Florida, such as sunrooms and swimming pools, are consistently expanding and improving to reflect typically encountered scenarios.
- It has provided uniformity to the State.
- Since incorporating the 2001 building code and subsequent updates, Florida has made great advances in converting the state to one building code for all construction. The Board of building code administrators and inspectors is working hard to insure all code officials and inspectors meet the requirements before allowing certification. The Florida Building Code has increased the quality of construction and strengthened buildings through product approval. By requiring all exterior products to meet strict standards and pass pre-set tests prior to incorporation into a structure, new construction is better prepared to survive Florida weather.
- There is at least one uniform statewide code, if you don't count the South Florida Building Code (HVHZ).
- The informal and formal interpretations availability has been working well but will be seriously undermined if fees are charged for the informal interpretations. The goal is uniformity of interpretation and application. Don't make it more difficult than it needs to be! You have people willing to be on the interpretation committee without compensation. There is no need to charge \$!
- Where the code is properly enforced buildings are reasonably safe. The Codes are easy to use.
- I think that it is working well to streamline the enforcement of the code throughout the State.
- The FBC is based on a nationally recognized family of building codes with appropriate Florida specific modifications.

## **2. What is not working well with the Building Code System.**

- Authority for code promulgation and compliance is at times usurped by other governmental agencies. This leads to unrealistic and unachievable mandates on the Commission.
- In the most fundamental sense the FBC fails to achieve the four stated goals. It is extraordinarily

complex, too highly prescriptive, not uniformly interpreted or applied, often is not affordable and as applied by local officials frequently stifles innovation and new technology.

- The way Florida specific requirements are handled causes large amendments to the Code sometimes even before implementation.
- Everything is working great with the exception of Politics getting involved in codes which they know nothing about...Our legislators cross the line of reason and accountability when they let special interests dictate to them what to include or not include in the codes for their special interests...The international code body determines best code use and practice for the safety of our citizens...the legislature should not be micromanaging for the sake of votes...Right is right and votes should not make a wrong...right.
- Too many revisions annotated interrelations of code come much too late (often a year behind adoption) uneven enforcement throughout state capricious code officials lack of timely electronic searchable format for codes.
- The statutes and code does not address well enough where an Architect or Engineer (with credentials in system specific design) are allowed to be the sole professional on a project. As an example a local chemical engineer is the only professional on a church (Assembly occupancy) and he defends this as the architect being incidental to the foundation design. I contest that he is not qualified to even do the foundation design, or any of the other engineering disciplines, civil, structural, mechanical, electrical, plumbing, fire protection, and especially architecture with proper life safety analysis. However, the local building official will not challenge this person, because the codes and statutes do not specifically deny this practice. I was previously licensed in Oklahoma and that states statutes specifically spell out the professionals that must sign and sealed projects based on the occupancy.
- The 'interpretation' of the code is inconsistent. Building and fire officials are using the code to deny or approve at their discretion. The licensed professional has no choice but to agree with a code/plan review comment as the permitting or construction process will stop otherwise. The authorities having jurisdiction are being overly conservation and not open to other opinions in the process of their decisions, concerning alternative determinations by the design professional. The fire officials/plan reviewers are going beyond the NFPA and injecting their opinion on building code issues.
- It is constantly changing, constant corrections, always trying to reinvent the wheel.
- It is far to voluminous and detailed. it is very difficult to follow every nuance of the code.
- Too many conflicts with other codes, such as NFPA-101. Although 101 is technically part of the code since chapter 36 incorporates the Florida Fire Prevention Code, that contains 101, there are too many discrepancies between 101 and the FBC. We should have only one code.
- Confusion with products that are manufactured for use in more than one state. Competition is best on an even playing field. Contractors and architects that compete only on the basis of knowing the Florida code well may not actually be providing the best service or creativity in other areas.
- There are simply too many and too often mandated corrections/ changes/ intercode related references to make anything simple and direct.
- The Florida revision process effectively politicizes the code and does not add meaningful benefit to the model code base. We continue to carry over lingering tidbits from the previous codes used in our state pretending that they offer our citizenry "added protection" when much of the storm damage that has occurred over the years is well documented not to code requirements, but to lack of enforcement for the code in place. Enforcement is not enhanced by constantly tinkering with the provisions of the code, but rather by having a consistent code that professionals and code officials alike can come to learn and use daily. Look please at the vastly increased volume of the Florida Code today verses 20 years ago when much of the state was using the SBC. There are hundreds if not thousands more pages. Maintaining familiarity with such an expanse of regulation is counterproductive to the ultimate compliance. A more stable code would be a better code. Leave the revisions to the model code process.
- Mid-cycle supplements, forget them! They create confusion.



- I believe the Code unfairly punishes existing buildings that have minor remodeling. Some jurisdictions 'pile on' all sorts of requirements for existing buildings to meet unreasonable parts of the current Code.
- Still too many conflicts with other codes such as the Florida Fire Prevention Code.
- Bureaucracy is stifling. The 2007 FBC came out after work had already started on the 2010 edition.
- There are too many modifications to the base International Code. The unique needs of Florida are questionable.
- FB Commission missing deadlines to adopt new code edition on time to match up with the year of the edition (i.e. 2010 edition not getting adopted until at least March 2012); committee dysfunctionality. Wind exposures need more concrete definitions so that architects and building officials are on same page with when to use Exposure B or Exposure C. Need PDF version of FBC for ease of online use instead of current electronic format. Committees have too much power and are lobbied too heavily. Look at the residential fire sprinklers as an example. It never should have come down to the legislation having to nix what a code committee wanted to inflict on all new homes in FL.
- TAC Committee structure has outlived its usefulness.
- Frequently changing the Code makes learning it more difficult for the Designer and the Codes Administrator. The changes have become increasingly complex and less user friendly. Electronic copies initially could be purchased as one copy for the whole office. Now we have to purchase numerous copies for the use of the different designers and Architect. Is the purpose to comply with the Code or make money selling Codes?
- The administration and enforcement of the code throughout the 67 counties and municipalities. The "uniform" approach needs further attention if we really want uniform code enforcement.
- If we repeat the same structure that we built last year there will be approximately a 10% increase.
- I don't think entire new codes need to be written and adopted every three years - it is too expensive.
- We manufacturer metal power control rooms to house electrical equipment, which aren't addressed very well since they fall outside of the Manufactured Building standard definitions. since our buildings are quite large and often ship in heavy multiple unit section weighing up to 95,000-lbs, the requirement for a 2:12 roof slope present undue and very high shipping costs.
- I have not encountered any problems with the system.
- Information seems to be a one way street. Seems that special interests hold more sway now.
- Compliance and enforcement of the Code is not consistent between different areas of the state or within a jurisdiction between a contractor with political connections and one without (too much interference) Code change cycle not consistent and too many glitches (If its not broken or flawed leave it alone, It appears that codes and enforcement are becoming too commercialized).
- Red tape in obtaining permits, cost of permits, difficulty of the public understanding the system and requirements to fix what would be relatively minor problems in another state.
- Too many conflicts with the Fl fire Prevention Code.
- Precise terms being used are sometimes not defined making interpretation cumbersome. While in other instances terminology appears simple yet has underling meaning that is not easily discernable or has obscure meaning that is difficult to uncover.
- ADA requirements, environmentally friendly designs, fire flow demands, and clear guidance on disposal of floor drain water, condensate water, and chiller plant blow down water.
- Not using the ICC codes completely and doing away with the Florida codes.
- Product approval application review.
- Can't say I have any thing bad to say.
- The product approval process is too dependent on the assumption that the engineer's knowledge works in all cases to provide a competent evaluation of products. There is no checks and balances as there is in the Miami-Dade product approval system, where a PE with special knowledge reviews the engineering calculations for compliance with the test results and accepted engineering practices.

- The Residential Building Code is not available online.
- The most aggravating issue are the many code changes that are made only to be revised or overturned the next code issue.
- The lack of a published elevator code, our system in Florida is bad to say the least. No continuity as each inspector applies the mixture of code to suit his own taste. We desperately need a code that the building official can go to and also the design professional can use, to not have so many issues with so many different inspectors creating their own rules to follow. I think the system now is awful.
- Can't back up from one screen to the next or from one page to another. It always sends you back to the beginning.
- CEU classes are for a most part just a reading of the information in the code or a hand out and a waist of time, More free on-line courses. Good instructors etc.
- Certification of inspectors.
- Code books are getting to large and very difficult to use especially in the field.
- Educational entities that administer their own FBC from my experience do a poor job due primarily to funding. Some day there is going to be a loss of life accident and the cause is going to fall on poor code management. Before I took over the duties of CBO a local college they had no one certified on the maintenance staff yet they were doing electrical, mechanical and plumbing work that required the individual to be certified.
- Getting information out from DCA, DBPR etc.
- Too much influence from one perspective and not enough balanced input from all code agencies.
- Could take more direction from the already established IECC, although Florida has specific climate considerations, the process is becoming too long when work from the IECC can save some time and effort.
- BCIS seems unneeded for products with an ANSI approved certification process. The BCIS just adds expense and is difficult for small manufacturers to endure. Enforcement of the energy code seems non-existent.
- "Permissions" and "access" limitations when referring code sections to other customers.
- Ease of finding Product Approval status.
- The TAC agendas and minutes don't seem to be updated on a regular basis. It is difficult to navigate to the TAC and commission information.
- Too much room for interpretations resulting in conflicts in exact same issues.
- Generally building departments are not consistent with interpretation-and think that commercial codes are for one and two family.
- Sections of the Florida Fire Code dealing with occupancy separations for existing buildings. This causes a conflict with the existing Florida Building Code since the Fire Code assumes that the existing building were constructed to the International Building code, therefore both codes would have matched.
- The method of code amendments to the code and implementation of them.
- Private providers, private companies, segmented State agencies, complicated codes, poor training, lack of State support for Building Departments, arrogance of DBPR, DCA, FBC to the little guys in the field, a BOAF with political ambitions, lack of State leadership for the FBC, the devalue of the Building Official, lack of effective communication from State agencies, out dated State websites, too many non-binding interpretations and not enough clear and decisive code determinations, and we have forgotten we are public servants.
- Building Inspectors & Building Officials need to be removed from the employ of the Jurisdictions were the Codes are enforced.
- I have no knowledge of matters not working well.
- Special interest groups have no idea what they are talking about.
- The code works fine and should be left alone once it has been printed and adopted. The glitch

amendments need to be put into the next upcoming code change instead of constantly putting out amendments. This is what upsets the balance of enforcement of the code.

- Special interest groups implementing changes with little if any realization of the impact to other building systems...also, implementation in the field of a universal set standards. The variance and simple lack of knowledge during practical application of inspection often takes all of the "good" out of the building code.
- The code is not clear about use of Residential code as a stand-alone code, as the FMC and FPC are referenced as code requirements in the FRC.
- New electrical circuit breakers requirements for single family homes are unreasonable.
- I would like that the Fire separations were more stringent. I am not a fan of sprinklers as a lot of people is. I think that passive systems are good too.
- More clarifications in enforcing Chapter 11 mainly the Fair Housing Act. When I was challenge I didn't find any support to enforce what it is in chapter 11.
- The arbitrary interpretations by local building officials on changes to existing buildings sometimes put unnecessary financial strain on building owners during these economic times. Another large problem is the split of authority between the Fire Marshal and the Building Official. Everything is still not in one code as the Florida Fire Prevention Code conflicts in some areas with the Florida Building Code.
- Interpretation and application on a local level. Incorporation of emerging products, technology and processes.
- Too many variations between the Florida Building Code and NFPA 101 are causing many to gave severe issues with enforcement. Additionally the Code is not administered evenly from jurisdiction to jurisdiction. many authorities are not educated enough to interpret the spirit and intent of the Code. One jurisdiction was requiring that Architects put the NOA description for components and cladding on the drawings, then sign and seal the information. This is a clear example of an authority instituting a policy on an aspect of the design and business of architecture or state statutes that he does not understand. The NOA has already been signed and sealed by an engineer. An architect is not permitted under FS 417 or 61G1 to sign and seal information for which he does not have direct supervisory control. Additionally, glitch codes issued within months of enactment of the main Code illustrates that the documents are not being thoroughly prepared or reviewed prior to issuing.
- Fire marshals do not use this code and we sometimes see a conflict of interpretation between the Life Safety Code and FBC.
- Not current with IBC lack of available public access to FBC referenced documents and standards poor reference to and access to the official product approval system significant industry confusion between the state wide product approval system and Miami Dade approval system current disconnect between the Florida handicap code and the new 2010 ADA.
- FFPC is still at odds with much of FBC.
- As far as I am concerned the only issues I have had is between the Florida Building Code and the Florida Fire Prevention Code.
- Too much time is spent going over previous actions.
- Waiting on changes and adoptions and the multiple documentation needed.
- The process for updating the Code every three years is too cumbersome and results in updated Florida Building Codes being out of sync with the national model codes by a full edition/code cycle.
- The Building Code is working fine...the Fire Code should be amended annually such as the Building Code.
- Lack of meeting and the need to teleconference. It is very difficult to discuss a lot of these complex issues over the phone.
- Too many updates each year.
- The code is trying to be to specific related to allowing the AHJ more latitude for rational thought.

- Existing inspection and compliance.
- Difficult to access FBC declaratory statements on accessibility issues/waivers.
- The consistent amendments hamper the ability to assure that the most recent correct code application is being met.
- Legislative involvement in the code development process. The legislature should not write code. Delays in adopting the next edition of the Florida Building Code to keep up with the model codes. Codes should not be adopted prior to the published version and electronic versions being available to the users. Too many glitch changes. Too many Florida specific code changes. Florida is not that different from the rest of the nation.
- Product Approval System.
- Lack of training for those not with building departments.
- All jurisdictions need to enforce the codes. Too many exceptions are given. Inspectors in the field need to be given more authority to enforce the Code, even if errors or omissions are discovered in the field during inspections. Too often the inspectors are told if it was missed on the plans, you have to let it go.
- The number and timing of revisions to the basic code.
- The system has Florida building interest dissipating their efforts with two code change processes and not being allowed because the cost involved to participate properly at both. This hinders Florida interest not being properly represented at the base code body.
- Deviations from International Code and NFPA 101.
- The knowledge base of the construction community is still, what can we get past the Architect, Client and Inspectors.
- Lack of uniformity in local enforcement and interpretation lack of uniformity and simplicity in coordinating and enforcement of Florida material/product approvals boiler plated plans review comments near uniform lack of acceptance of a project/specification manual as a construction document”.
- Building official not having the back ground on fire safety issues.
- Elevator issues, the new "universal Key Idea”.
- The constant changes through supplements and legislative actions. It is beyond comprehension why this gets worse during each code cycle. Just because an arbitrary date comes along does not mean the past code was bad. Simplify the system and don't look at a totally new code every three years.
- Some conflicts still exist between the two codes but they are becoming a more joined and supportive code to each side.
- There needs to be more interaction with The Florida Fire Prevention Code. Life safety issues in the building code and fire code should mirror each other, such as when sprinklers and fire alarms are required.
- The exceptions from even enforcement, whether department or individually driven. Uneven enforcement cost a contractor or builder/developer at the very least a lot of time, at the most a lot of time and money. This is patently unfair and makes all levels of enforcement look bad.
- Legislative interference in support of special interest.
- The Building Code and the fire code should be more in line with each other.
- The existing building code - definitions and applications.
- Technical amendments. They should not be permitted.
- Overkill of requirements, The BCO does not understand the intent of the Fire code!
- It allows years to pass before life safety requirements are implemented and keeps putting off other life safety necessities.
- Construction industry trying to water down or remove certain code requirements.
- From my perspective some CBO's don't seem to want to work with fire code people to resolve differences.

- Further coordination between codes is required. We are also behind technology. Both the Florida Building Code and the Florida Fire Prevention Code should develop a way to utilize the latest editions of the codes.
- On many occasions although the code is a minimum, many officials deviate from the required standard. All too often this code is not enforced to its mandates and many of the inspectors are not familiar enough with its intent.
- The possibility of the Building code system superseding the Florida Fire prevention Code by leaving certified fire inspectors and fire marshals out of the review and inspection process.
- 106.3.5 it's too open ended; local officials are using this section as a catch all for very mundane review comments and a cause to create extra work. It's maddening when an experienced reviewer kicks back the drawings with a comment to be corrected as simple as an abbreviation used on the structural engineers drawings (s.o.g. = slab on grade) not being listed in the architects standard sheet for abbreviations and symbols.
- Dissimilarities between the Building Code and the Florida Fire Prevention Code.
- There are some sections in the code book that are vague or sentences that are worded that are a little hard to comprehend.
- Too many revisions. You need to settle on a code and quit making changes. It costs us a lot of money (not to mention file space) to have to keep buying new codes every couple of years.
- Again see number 1. As a member of the Pinellas County Construction Licensing's Board. I don't believe we need so many exceptions.
- Some lack of communication between building and fire officials.
- Could be a better balance between Florida Fire Prevention Code and Building Code . It would also be better to have more building Code involvement in existing structures.
- The users of the building code system seem to me to want to have the building code be the end-all for code compliance.
- I'm not aware of any one provision that is not working well, but it would sure be nice to see more B.O. & F.O. cooperation, but that's not really a matter of the code per se'.
- A philosophical difference remains between building officials and fire / life safety officials. This difference is apparent when addressing specific codes addressing; occupancy classifications, occupancy loads, means of egress, etc.
- Too many variations and interpretations of permit application forms, correction notices.
- New technology needs to be addressed better. High velocity hurricane zone code sections need to be incorporated into the body of the code. Legislators need to garner input from code officials prior to requiring technical changes to laws, and require code related items to be incorporated into the code, prior to having Building Departments enforce. Code officials having to test for licensing based on the ICC, and provide enforcement based on the FBC is very confusing and costly.
- The ADA efforts of Florida.
- There is no commentary on the Accessibility Code Chapter 11.
- Coordination with Florida Fire Code.
- Need to take out the individual interpretations.
- Too much is left to interpretation, it should be that what is states is what it means and not left to varying interpretation.
- The lateness of issue of revisions and continuous correction of glitches serves no one well.
- Having two codes to deal with one to test by and one to enforce, having to buy to code books , ICC and Florida.
- I am not aware of any problems.
- Florida Product Approval isn't my favorite thing. Its pretty loose with regard to how the process works. Plus there is a lot of grey areas with regard to how much something with Florida Product Approval can

be modified for site specific application.

- There is not enough education and training available for the FBC, code development, code change, code enforcement, and the BCS programs.
- The system was set up to fail. We are late, way behind times and unwilling to accept that we are not unique. Three Codes.
- Florida Product Approvals are still not available for several viable products leaving in some instances a lack of competitive bidding.
- Time line for new / addendums .
- The frequency of changes is excessive. We need to be more like the I - Codes in that once you publish the code, it does not change for that cycle. All changes need to be held until the next code cycle.
- To enact a code dated 2007 over two years later is ridiculous. Why are we not using the ICC like the rest of the civilized world. The code has become too political. That' Florida, of the developers, for the developers, and by the developers.
- Producing a code with way too many errata. If the code is not ready do not send it out incomplete.
- The current Florida Building Code, being adopted from the ICC, has become abstract and almost impossible for the Architect to identify and catalog every requirement for even simple buildings. The allowable size and area charts are as ambiguous as the tax code when it comes to understanding if a building requires automatic fire sprinklers - or not. The code has grown to 7 or 8 volumes. Simplify the code. It took years to learn the Sothern Standard Building Code - which was understandable and concise.
- Product approvals and existing building code are not being consistently implemented.
- Code changes that are not really Florida specific, just what the lobby can get approved for their clients.
- Better integration with fire codes, too many discrepancies. Too many changes in between cycles.
- The coordination with other code and rule writing agencies, such as NFPA and Florida Health Department, has not been as thorough as it should be, and increased communication and comparison is needed. In addition, the time lag between publication of the base code and adoption of the Florida codes has been too great.
- Political and legislative interference in the code development process.
- Volumes and volumes to research through.
- Special interest is adding too much to our codes.
- Universal acceptance of requirements throughout Florida (like utility separation requirements).
- As an individual looking in I would say one item is with follow up of outdated or expired permits and enforcement of inspections and compliance when expiration occurs.
- Conflicts with the FFPC in some cases.
- Duplication of inspections from statutory requirements. --Donald Baer, North Naples Fire District
- Certain codes (i.e. NEC) are written as a separate code and are not specific to Florida though I do not believe it possible to do otherwise.
- Having a fire code that is not coordinated on a national level with the fire prevention code.
- Code is not a code but a document with references to hundreds of other documents. It is too complicated and hard for an engineer to follow, much less contractors and lay persons.
- From my view, the thing that is not working well is the fact that the inspectors need more training and be held more accountable for code enforcement.
- Finally endorsing a code at a date when the following edition is due need a faster review and development process's.
- Definition of structure: it can be all inclusive. Should the definition be revised to exclude or qualify certain either specialized or complex engineered works. Likewise what about certain dominium structures (let's say barb wire fences or similar).
- Many contractors still believe that compliance with the Code is not their responsibility and still think that the Code is the maximum performance criteria as opposed to the minimum standard. Some engineers

and architects still seem to look at the code criteria last during their design process.

- Politicians, insurance lobby and others have too much say in the process. Take the Florida Legislature out of the equation.
- The code is being influenced by special interests. For example, requiring fire sprinklers in residences will tie-up sprinkler companies and increase costs across the board.
- Latest code issue removed wind design pressure data out of code book because it is in ASCE. Most useful document in code book for windows and doors, has been removed. I use old copy of table.
- The realization that every new requirement, no matter how well intentioned puts to cost of home ownership out of reach for another segment of our population.
- Building departments still decide which parts of the code they choose as important and what is not, and tell the building inspectors not to enforce some code articles. Also, most building departments have pressure to look the other way or to be tolerant of some contractors or owners depending on what the city council, county commissioners, or administrators wish to impress on the building official. Local governments still feel they can use the building departments money for general fund expenditures.
- The Miami-Dade requirements are still basically a code within a code.
- Too many changes between code cycles.
- The adoption process is still in need of improvement. The national model codes should not be amended - justification should be clearly Florida specific.
- some of the unlicensed trades stucco, paint not having a good spec.
- Changes, changes, and more changes. Give us a Code and let us apply it for 2 or three years. At the next code cycle make your code changes and then leave the code alone. Consistency is the only way we earn credibility with our constituency. It's hard enough without all the revisions.
- State wide code enforcement is poor.
- There are some differences between the fire code and building code.
- The Building Code updates take to long and delay adoption thus causing us to be using outdated codes.
- We test on one code yet have to enforce a different code.
- FBC needs to be 100% IBC without Florida changes.
- Coordination with other codes and regulations (conflicting requirements) Promotion of new technologies and having them meet the standards.
- Some of the requirements in the building code and the fire code are a little off.
- Too many changes to the code. Legislature too involved.
- Seems to be some differences in the driving factors for sprinkler systems. Also seems that the FBC has a different look at the residential and townhomes. Townhomes are being built with firewalls to the roof deck with 4' treated wood from wall and permitted as such, but when sprinklers are required, they are being permitted as residential.
- Florida Product approval system is hard to navigate and get real information that is helpful in the field and during plan review.
- Too many changes, too often, to the base code.
- The FBC system and specifically the FBC itself needs to be coordinated closer with the Florida Fire Prevention Code. Coordination was made originally, however several items between the two codes still need to be addressed.
- Some jurisdictions are applying the exterior water barrier differently. For replacement windows some jurisdictions are requiring new construction installation.
- Way too many changes, and way too many books. It has become such a challenge just to find something that you know you have seen before, or moved to a new location, or removed. The books never come out on time and there are always amendments on top of amendments to add in.
- Buying a complete set of books for every inspector every code cycle is very expensive for the municipality.

- Consistency with interpretations.
- There are areas that differ from the Florida Fire Prevention Code.
- The codes may not address the new technology as quickly as it appears on the market.
- the structural code is cumbersome - having to deal with Residential Code, Existing Code and Building Code. Also changing all the codes every three years.
- Too many books.
- We are still not there yet, the high velocity zone differentiation is unnecessary. I don't believe there should be a Florida specific code. The international code is sufficient.
- There is not a need for the Florida Building Code as a separate entity. The International Codes work worldwide, who is Florida to think that we need something special.
- Alignment with ICC and Fire Prevention codes in Florida.
- The code seems to be highly influenced by special interest groups such as the insurance industry. The special interest groups path to code influence seems to be through the Legislative and Executive branches of Florida's government. I give you the example of Hurricane Mitigation Retrofits for Existing Site Built Single Family Residential Structures. This is a good example of the legislature mandating something it knows nothing about because of political influence. The Building Code should never be steered by politics if it can be helped, therefore the Legislative or Executive branches of Florida's government should not have a dog in that hunt other than appointments to the commission.
- The building code system needs improvement in the timing of the adoption cycle. It needs to take less time to adopt the Florida Building Code.
- Chapter 13 Energy Efficiency is not cross referenced with other codes. Something similar to Table 2703 would be helpful. Commercial and residential definitions should be provided and clarify how they apply to each use classification in Chapter 3.
- There are too many revisions/changes between the dates of the three year code period.
- Providing a glitch amendment in the middle or even 6 months after activating the Code does not serve Code Enforcement well. We are already dealing with learning the new code changes and then are provided with additional code changes that may be a change to a change. Very confusing. Also, the additional cost of providing a building department with Code Books (12) and then having to purchase additional glitch pages, not to mention the time it takes to insert them in the Code Books is not the best use of time or money.
- There has been some confusion as to the sprinkler requirements of residential occupancies between the building and fire code.
- Too many amendments, no notice when the amendments are incorporated. We bought 72 sets of code books and never received any notice that new pages were printed for amendments to the code. Difficult having to purchase Florida Code and ICC code books as we operate in and out of Florida.
- The amendment process is cumbersome which leads to delays in implementation of base code changes. There are numerous "Florida Specific" amendments that are not needed and are not actually Florida specific.
- The state code lags behind the international building code. We have too many Florida amendments to the model code (international).
- The process and the allowance of all input is not given a time certain or curtailed.
- The changes to the code should not be allowed too change but 1 time every 3 years.
- The time involved to make or resolve conflicts with in the building code before it is ready for use as is.
- The 'glitch' and amendment system. Too many changes following a late issuance of a new code, or even before code is implemented. Lack of uniformity of interpretation between municipalities.
- There is no one overseeing the work and we have sections conflicting with other sections as well as major conflicts with the FBC and the FFPC.
- Lack of consistency with the Florida Fire Prevention Code; Inconsistent interpretation and application.



- From what I can see...how individual plan reviewers interpret the code or the lack of enforcing certain provisions in the code (i.e. their level of knowledge with respect to the code). Also field inspectors level of knowledge with respect to the code is also attributable to reasons the Building Code System is not working well.
- Delays in implementing code changes due to a specific Florida review process should be streamlined.
- The FBC is an odd mix of several national codes into one book. It is very hard to find things. STICK TO IBC and have an amendments package that deals with Florida. The FBC wants old buildings to be upgraded to current hurricane codes...but no one knows how to do this. Some guidance would help.
- There are still some conflicts in the code itself as well as between the code and local ordinances. The building officials are often hesitant to make a ruling without going up the food chain for fear of litigation. This is especially true when ADA issues are involved.
- Product approval process and testing criteria! must be the same standard statewide so that all products can be evaluated equally not just the one for the HVHZ zone and all others. Also cost of testing leads to Florida being isolated from manufacturers who cant afford the ongoing cost for such a limited market (i.e.: the HVHZ zones are a limited market) local code enforcement / interpretation. many areas have there own ideas. --James Archer, architect
- I don't find it helpful when it references another code without letting you know what that code says. You then have to purchase that code, or if you already own it, track down what it is referencing. This is extremely time consuming and confusing. Why not just state what you want.
- A faster way to get binding interpretation would be helpful for the AHJ and the customer.
- Too many rules and variations for the inspectors and CBO's to keep up with.
- Although communication is working better than when the State was under the Standard Codes, the outreach training and information sharing process could be improved. Hopefully the new surcharge will provide the necessary funding for additional training. Compared to the police and fire departments dedication to keeping training a high priority, the legislature should acknowledge the same training for officials and inspectors. I feel we are only part of the way into the tent.
- Changes that the legislature institutes outside of the building code process.
- The code is enforced at the local level, but it still is a on going educational challenge to make homeowners as well as contractors aware of the code and the changes that it goes through.
- Special interests have optimized control for their products/industries. Participants have implemented requirements that do not meet the definition of Florida specific and have been successful in inserting these requirements into the Code. The code is still not enforced uniformly statewide. The Florida Building Commission is mandated to update the Code frequently which causes confusion in the field and is very expensive to maintain books causing non-compliance.
- The enforcement and application of the building code.
- All of the special interest modifications to the basic IBC code.
- It takes to long for the new codes to be issued. We are always a code cycle being the IBC.
- To much paper work that is never read, is read by non professionals that don't understand the submittals and calculations or whose job is only to check a box in a submittal form.
- Education of Contractors and Design Professionals we keep seeing the same problems they are learning from the reviews and/or inspections. There is little room for home rule issues that effect or concern south Florida sometime hamper or have little bearing on the northern two-thirds.
- Still work to do on making the Codes consistent with each other.
- Private Provider. This does not work well. Many of these individuals, although able to pass a test, do not have the knowledge and skill to perform the work. I know several who refuse to even buy a code book. Additionally, it is more subject to abuse as the private provider is working for the owner and not independent. If he/she sides against the owner to follow the code, he/she is likely not to get the job again. Therefore, they are tempted to look the other way or ignore the code.

- Changes, glitch amendments, a veritable rainbow of page colors makes it essentially unusable in a field environment. Far too much divergence from ICC base code. Totally out of synch with ICC and always late. The 2007 FBC based on the 2006 IBC came out in 2010! And it was still screwed up (there are only two people in FL who understand the energy code; one is dead and the other is in an insane asylum)!!! Lack of coordination w/NFPA-101 & FFC!
- The cycle of amendment of new codes is rushed to quick with two years cycles. The TAC committees & the board approval must be stream line in a manner. That the comments from the public & TAC committees of using the moderations of Roberts Rules Of Order, The act of double negatives in the order of voting or a method of confusing the promulgated order for the code for the intent for which it written or designed to help the citizens of the State of Florida.
- Too many resources are devoted to changing requirements in the code that are not Florida specific. - Out of state design professionals sometimes experience time delays in permit approval because they are not familiar with Florida specific requirements. - In a few cases, something will be allowed in one code edition and will not be allowed in the next one, causing difficulty in explaining issues to owners, contractors, and inspectors. - Too many manufacturers are trying, and sometimes succeeding, in inserting criteria that is too burdensome to document, plan review, and inspect for issues that are not high priority life safety.
- Not applied uniformly in all jurisdictions within the state.
- Licensure for building code officials and code inspectors has not been user friendly and is confusing to a first time user. Department of Business and Professional Regulations website lacks information regarding testing requirements as well as where to find test information.
- Code: The Florida Building Code has too many modifications of the base code that do not have a Florida Specific justification. Commission: Lacks leadership and members that have building expertise. DCA support: Spends too much effort manipulating the commission. Facilitation: Does not add any value to the process. Enforcement: Needs more state funded training Code cycle lags too far behind publication of the base code document.
- The code is generally accessible through the books and on line but it is very frustrating that the code sections cannot be copied and pasted for plan review and inspection comments. I realize this is due to copyright infringements related to ICC but it is too bad this couldn't be rectified. It's not like the Code doesn't get copied. I would think the big issue would be somebody besides ICC making money off of selling it.
- The legislature's continued and confusing meddling with the codes without any real data or knowledge to support their actions. Special interest groups manipulating the Code process with out keeping the overall intent of the code in mind. Lack of education of many users in using codes.
- Most jobsite construction staff of contractors are not knowledgeable in the requirements of the FBC, and a large portion of licensed contractors are not directly supervising (they rely on their staff) their projects. The result is that many times the only person really knowledgeable in the FBC is the building inspector.

### **3. Respondents general recommendations for enhancing the Building Code System.**

- Streamline the FBC update process to be not more than one year behind the most current editions of the International codes.
- Allow for proper funding to the Florida Building Commission to permit timely thoughtful deliberation.
- A simple easily understood code written in brief performance based language (setting forth the required outcomes or results rather than prescribing the how to) that is stable over time (not subject to continuous review and revision as in the current process), and based entirely upon sound scientific evidence and research.

- Adopt the I- codes and provide a Florida specific addendum publication.
- Don't go to a dentist for a heart replacement...let the experts in the code process do their jobs...don't have the legislature pretend they know more than the experts...convince the experts to follow their convictions.
- Do not adopt codes until annotated interpreted version is available in searchable electronic format publish fully descriptive comparison between adopted code changes and previous code section.
- The statutes need to specifically spell out the professionals that must sign and sealed projects based on the occupancy.
- Allow the design professional more leeway in resolving code related issues. They are the licensee professional and should carry not only the responsibility, but the authority as well.
- Change the FBC to simply incorporate the IBC with no, repeat no, state changes.
- I would prefer that Florida adopt the International Building Codes with amendments. In that way the differences would be easier to determine.
- Simplify.
- Other than hurricane issues, it is more problematic to have a separate Florida code rather than following a Federal or international code. It puts Florida architects at a disadvantage to practice in other areas, and vice-versa.
- Take it out of the primary legislative process and allow the professional organizations and conferences weight the statutes and compliance.
- Adopt the methods and policies of IBC and adopt that code.
- Former Codes such as the SBC only required new work on an existing building to meet the current Code. The FBC should take that approach.
- Better coordinate the FBC with the FFPC and remove conflicts.
- All tables have to be restudied, coordination of the code between sections, and other codes specially with Fire code. Use of same nomenclature between the different codes.
- Adopt the system utilized by Indiana where the state adopts the I-series of codes and issues exceptions on 8 1/2" x 11" sheets of paper. Adopt time limits for incorporating code changes.
- Make proponents of code modifications really prove the unique conditions for code modifications, including detailed cost assessments.
- Force the code committees to have to live with a drop-dead deadline. Get us back on track so that when the 2010 code is issued in 2012, it is called the 2012 code and not the 2010 code. Drop the annual supplements to the code. Gets too confusing for architects and building officials to know when they are issued. It makes using the code an annual updating thing instead of a triennial updating of the code. Hold the supplements until a new code edition is issued.
- Let ICC code be the standard with a Florida attachment for Florida code interests.
- Stop making wholesale changes to the Code! Tweaking is important, but gee whiz.
- Continue to reach out to all of the enforcement communities in an effort to provide uniformity.
- It does not need to be added too. Language needs to be more specific. When the plan reviewer does not understand what the rule says, and can not get an answer, i.e., what is a truss?
- Issue amendment as inserts into existing codes - let codes stay in effect for at least six years before printing a new one.
- Consider having smaller sloped roof for buildings to present more economical designs especially in Broward and Miami-Dade counties.
- Interact with those that use the codes daily and work with them more.
- Make the inspectors and plans examiners state employees to create a cushion between them and local influence (A lot of good inspectors and plans examiners do what it takes to keep their job). Require a min. of 10 years experience in a trade before qualifying for licensure (Practical experience can not be replaced by reading a book or taking (cram) classes). Do away with the 1 & 2 family licenses (There is too

much for one person to properly review inspect for code compliance and enforcement).

- Simplify, simplify, simplify.
- Use only the building code as it relates to construction.
- Define terms that appear to be common yet in context require interpretation. Define the simple terms that have an underlying meaning that is not readily or easily discernable or has obscure meaning that is difficult to uncover. Perhaps providing a cross reference to the glossary the writer use when the term is selected would be simple to add.
- More information on ADA outdoor requirements to include curb ramps, door swings, slopes, and routes. Integration of USGBC requirements. Updated references to the new ISO for fire flow demands. Specific guidance of the disposal of floor drain water, condensate water, and chiller plant blow down water.
- Use the ICC codes completely.
- Better defined rules of product approval (details about each method) and more feedback to the applicants during the review process.
- Easy to follow.
- Again, for the Product Approval System, Technical Validation rather than Administrative Validation would help, but not eliminate the unbiased review process. Only independent reviewers, not selected by the submitting engineer would give credence to the process. The ICC-ES has independent reviewers (as does Miami-Dade BCCO) and their product approval/report is more reliable, but much more expensive. It seems that cost controls the FBC system, rather than Quality of Product Evaluation, Validation and approval.
- Make both codes available online. Make them searchable.
- More consistency.
- Just make it a little more functional for looking at page to page listings.
- It has been my experience and always the number 1 topic of discussion of how difficult it is to deal with DBPR. It is a challenge to get a new inspector certified rather than a process. Try it yourselves. Put more local integrity in the system and give more authority to Building Officials to validate qualifications, etc.
- Take out Chapters 11 and 13 out of the "Building" code book and put them in their own books. Our jurisdiction can not afford laptops with installed code for field use and the upkeep of the software.
- Organize a team and inspect the school systems management of the FBC. You will be horrified. Recently, HB 663, was passed, requiring a surcharge (FS553.721) for each building permit be collected and to be paid to DCA. How come we have to find out about it thru the Florida League of Cities newsletter or casual discussion with other CBOs. DCA should send each jurisdiction a timely message on it.
- Consider looking at the Uniform Codes.
- Instead of a glitch cycle, allow any change to be made and approved but consider waiting till the next published cycle for implementation (allow commission discretion for life safety and certain other criteria). Allow certification programs with certain credentials (i.e. ANSI) to be acceptable in lieu of the BCIS. Do a random audit of one certified products per manufacturer to confirm effectiveness and manufacturer would pay the standard fee for that application review. Have prescriptive compliance options for each component individually, require that every home/building meet either the prescriptive path or a certified performance based path, have the inspector confirm and sign off on actual installed components on both methods.
- Open the 'system' for all users.
- Streamline and update in a timely manner the commission and TAC information. A method needs to be found to communicate to all members recent decisions by the commission and TACs. DEC statements, code change processes, etc. An electronic newsletter would be valuable.
- Do what the code states and don't allow interpretations with as few exceptions as possible.

- Residential fire-suppression is overkill in most cases. This section should remain voluntary.
- Consistent code enforcement.
- My recommendations for improving the building code system to just use the IBC and IFB with just one chapter in each that only deals with the important, non-political, make sense code issues. Now how to do that I have no idea; I'm just an opinionated code person completing 38 years in the business.
- Involve the Building Officials - we do it everyday.
- Have Building Inspectors employed by the State so that pressure of loosing one's job would not influence how the Codes are enforced.
- For those building departments that are genuinely interested in duplicate certifications (i.e. s.633.081 fire safety inspector), they should do much, much more than simply send people to the core 200 hour curriculum. The state's curriculum barely scratches the surface of the necessary requisite knowledge and skills needed for fire safety inspectors.
- Save energy by enforcing the code we have.
- The code works fine and should be left alone once it has been printed and adopted. The glitch amendments need to be put into the next upcoming code change instead of constantly putting out amendments. This is what upsets the balance of enforcement of the code.
- More training in the field for inspectors. Less legislative interference that takes the "common sense" out of building.
- Make a clear delineation between the FRC and the FBC. One example is appliance protection which is not in the FRC, but is enforced per the FMC. The FRC needs to have all requirements in it, not a reference to FBC for other code requirements. FRC is applicable up to 100 m.p.h. All of Florida is 100+ wind zone. Eliminate all areas of the code dealing with under 100 mph details, charts, etc.
- Have less exemptions with Fire Rating Separations.
- A good clarification of Fair Housing Act.
- Plan Review should be required to be electronic. We are 20 Years behind of the construction industry. All Design Professionals are now using a software to draw and we are still reviewing drawings in paper against the green alternative and the advance in technology.
- Continue to simplify the Code to make it more user friendly. The web based search tools are of great help and speed up the process of searching and staying up to date with the updates to the Code.
- The Florida Fire Prevention Code needs to delete areas of reference that are already covered in the building code. This duplicity causes great confusion.
- Continued refinements as a result of user comments.
- Increase the minimum standards relating to energy efficiency and address poor construction practices. Review and inspect projects with a consistent level of scrutiny.
- Change the period of issuing new Code cycles to nine years. Allow "glitch" or amendments to happen every three years - nothing in between. The practice of construction has not changed significantly in the past 100 years. There is no need for the Code to change every year. Do not allow manufacturers to have as much input into selling their products by mandating items in the Code that account for their survival.
- Chapter 11 remains the most misinterpreted chapter. Illustrations should be revised to agree with the text.
- Fully adopt current IBC - no amendment.
- Make an all inclusive FBC, without a separate FFPC.
- If we could get the application process and requirements somewhat standardized it would be wonderful.
- Get rid of special interest and legislative input and rely more on the input of the Building Officials to the Commission.
- Schedule more regular meetings.
- Reduce the number of updates each year. Additional training for design professionals and enforcement officials.

- Allow only Florida not national codes.
- Stronger enforcement.
- Further coordination with Florida Fire Prevention Code.
- It is better that such amendments, if not an immediate threat to life safety, be forwarded to the next model code edition distribution. However, I concede that immediate threats to life safety (i.e. Chinese Drywall) must be implemented immediately.
- Sunset ALL Florida specific code changes every three or six years and force re-adoption if there is a true Florida specific need. Do not automatically continue the current Florida specific code changes into the new code. Streamline the time frames in the code adoption process.
- Take a different approach to the product approval system.
- Enhance training for Fire Officials.
- Work closer with Fire Service and other agencies to insure all Code and life safety requirements are met. Enhance training to make sure that all inspectors understand that the most stringent code will apply. If the Fire Code or Building Code is more stringent, that does not present a conflict, it is what it is and the most stringent code applies.
- Have the Code be effective for 5 years instead of 3 and then make just 1 set of revisions at the 2 1/2 year mark. There is no reason why the Code has to change every 3 years and the revisions do not get approved and printed before the next edition comes out. Also, the revisions dates for the Building Code should be the same as the State fire Code so that the gap between the code change-over will be eliminated.
- I would recommend that we amend the requirement in the law that requires Florida to adopt the Base code after 6 months after promulgation by the code body. We should become part of the code processes of the base code. The chairman of the commission has admitted to me that he has never attended a code change hearing of the base code.
- Stop deviating from International Code and NFPA 1010.
- Keep following the IBC lead!
- Plans review need to be rationalized as a cooperative endeavor between A&E - Builders and Public Code Enforcement. It's a bit too adversarial.
- Let the Fire enforce the fire codes in the building code.
- With the present state of the economy, I think that financial burdens and safety have to be matched and considered as closely as possible.
- First of all, skip a code cycle and take a breath. The current code has been tweaked enough. It is impossible to keep up with the changes that occur through supplements and legislative actions. It appears as if the goal is to sell code books.
- Keep up the working groups to help remove the few existing conflicts between the codes.
- Some conflicts still exist.
- Life safety issues in the building code and fire code should mirror each other, such as when sprinklers and fire alarms are required.
- Provide more than an appeal process. The individual enforcement officer must be held to a standard of performance and be accountable via a licensing appeal board.
- None at this time.
- Adopt the model codes as written without any "tweaking" by lobbyist.
- Do not print the code until everything is 100%. The Glitch amendments are cumbersome and confusing.
- The fire department adds value to the new construction plan review.
- Cross training, not only for the building code, but also for fire safety inspectors to understand the building code intent.
- To include the fire department in plans review, inspections, pre-plans and the development reviews. To take life safety more seriously. In the fire department we cannot keep track of how many fires we prevent

or how many lives we have saved with the current inspections and the current implementations. The goal is that everyone goes home. I do not want my husband, who is a firefighter, killed because some architect wants to cut corners to save money somewhere down the line. You cannot put a price on a life.

- Maintaining the fire service in the plans review loop.
- All parties need to recognize we are here to serve the public, for me that is the end user, not the builders and developers. It is our responsibility to make sure end users get safe, code compliant buildings.
- Eliminate code conflicts. Find a way to utilize the latest editions of the codes. Provide enforcement capability of fire protection requirements of the Florida Building Code to the Fire Official.
- Provide stricter enforcement at the AHJ level and an avenue for conflict resolution without political influence. Create law that makes political influence or intervention a crime.
- Leave the core competency alone!
- Merge the language of both Codes to being the same when dealing with occupancy separation, fire barriers, construction supporting fire barriers, and the hourly rating.
- Some sections can be explained in more detail and statements a little simpler to understand.
- Simplify, simplify, simplify!
- Develop code with minimal exceptions.
- Cross train or combine the FBC and FFPC with public safety in mind and not profit margin for the construction industry.
- Annual Building Code in sections of commercial structures would be a great way to ensure the communities safety especially in hurricane prone areas.
- Continue to work with the Florida Fire Prevention Code entities to reduce and eliminate conflicts and difference in requirements.
- I'd like to see more flexibility when it comes to alternatives and/or equivalencies, especially when it comes to resolving differences between the two codes and officials. Applying the language of s.553 for conflicts, it would be nice to see language that helps quantify equivalencies, similar to what Chapter 43 of the LSC attempts to do. The area of intumescent coatings is one that could stand a lengthy discussion.
- Continued coordination efforts eliminating comments noted in question 2.
- I think an improved search by topic, or item, that is past the headings for chapters, etc. would be.
- Eliminate conflicts with FFPC.
- Get the state fire marshal and fire inspectors out of the building code business.
- Create uniform statewide forms.
- Require legislators to have the Commission hear and solicit comments from the professionals in the field of enforcing codes, prior to passing code related laws. Adopt the ICC with Florida amendments.
- For ADA purposes, use the ICC's standard without adding all of the unnecessary Florida misunderstandings.
- Include more pictorials.
- Better coordination and update information from other state permitting agencies such as elevator inspectors.
- Institute a request for approval of interpretation and reduce the hodge podge of different interpretations that result in loose interpretations based on personal opinions.
- Adopt ICC Code as base and issue a Florida specific addendum.
- Use the ICC and have only one small book to handle the Florida Specific changes that might be better or really necessary. And somehow keep the legislators from making code. Let the code making processes work and maybe only change the code every five years. And only have annual changes that pertain to life safety issues. Having all these code books only make the publishers rich.
- Keep the currency with national standards such as NFPA.
- Better coordination of requirements for such items as sprinkler protection, fire alarms, rated walls etc.
- This is a no brainer. The code cycle should be limited to every 5 to 7 years. The three year cycle is simply

too short. About the time you get used to the new code another issue comes out. This simply leads to a higher potential for errors, etc.... Physics isn't changing but the codes constantly are. Something is very wrong with that.

- In the FBC, make reference for schools K-12 to State Requirements for Educations.
- More education and training is needed.
- Trash it and go to the ICC System and Codes.
- Do not allow changes to the code between cycles.
- Go to the ICC.
- Do not deliver building codes that are not ready. I would rather wait another year or two and have a complete set of codes that I do not have to constantly look at the updates for a complete understanding of the code.
- Get a handle on sprinkler requirements and fire rated exiting requirements including doors, glass, and ratings. Make it Obvious. Simplify it.
- Revamp the existing building code and how product approvals work.
- Drop the Florida specific stuff and accept the code as written that is published by ICC, and adopt the current edition.
- Continue with revisions to the base code, as before, but allow Commission members or others to get involved more directly in the ICC code development process to influence and help guide their base code to be more Florida-specific from the start. As an alternative, encourage the ICC to establish a Florida-specific code development subcommittee that would issue a base code that is more Florida-ready than currently is available.
- More funding for code promulgation, maintenance and education
- Let's keep it simple and in laymen's terms. Provide analysis and charts builders and contractors can use. We can still achieve life safety.
- Keep legislators out of writing Code.
- Somehow assuring universal acceptance from all departments/agencies in the state.
- See above. More restrictions on outdated and expired permits.
- Resolve known/identified conflicts with other codes.
- Clear up duplication with clear concise legislation.
- Move to a 5-year code cycle- not 3. Too many changes too soon. The code is now getting too large and all encompassing. We will soon get to the point that the code will weaken itself as it covers too much territory. The unbelievably far-reaching requirements of the energy code are a prime example – it's getting more complicated than the Federal Tax Code and when code (or laws get too complicated they are either applied incorrectly or ignored.
- Keep the Florida Building code. Do not weaken it. We need a specific code for our use. We are unique.
- Consider NFPA 5000 or IFC. Our system of state modification of the codes is ridiculous.
- A more up to date adoption with the IBC and the FFPC.
- More deemed to comply in simple terms. There are still a lot of Owner builders and less skilled contractors.
- Real and practical training of inspectors and plans examiners on the code.
- Put the elevator code in the state building code. It is awful, dealing with elevator inspectors who decide what to and what not to enforce. Every inspector gives you a different interpretation to some extent. It is even hard for the design professionals to deal with and as a building official I find it very unprofessional and almost impossible for me to also do an inspection to see that we are getting what we should be getting. Put the code requirements in the building code.
- Speed up the endorsement process.
- Make it more internet accessible or searchable. Make it more piecemeal printable. Make clear that new innovations or technology is welcomed. Remember that costs (both construction and code



- implementation) need to be reduced as a goal of the code. Adopt the ICC.
- Rather than adding more requirements to satisfy the Health Department or special interests simplify the code.
  - The lack of affordable housing is a principal cause of homelessness in this state. Either we need to examine every requirement in the current code from a cost benefit standpoint or develop an inhabitable shelter code that provides all the basic needs at an affordable cost.
  - Have audits to verify the code is being enforced evenly and fairly, and have the building department report to the state not the local administrators for code issues.
  - Work toward adoption of the ICC codes with fewer Florida-specified modifications.
  - No changes in Code until the next cycle is adopted.
  - Require Florida specific justification for deviations from the National Model Codes with code change submittals. Prohibit (good luck) the Legislature from amending code requirements to appease a few citizens who wish to ignore national safety requirements.
  - Enhanced safety is good but we still need to keep costs in line so that people can afford homes.
  - Adopt the ICC International code in its entirety. Include everything, seismic, wind, hydraulic and let the Code Officials apply what is relevant. Drop the Code Specific Florida Edition.
  - HVHC code.
  - Put some common sense in it instead of just listening to special interest groups and architects/engineers. The fire code requirements for many commercial uses are just plain ridiculous.
  - Have the building and fire code agree.
  - The Building Code Commission should get together with the State Fire Marshal's Office and provide joint training for both the fire and building officials.
  - Adopt the ICC codes and make your changes there.
  - See above.
  - Closer relationship with other codes and regulations (NFPA, FFPC, etc.) to further unify state requirement as well as manufacturers in order to work with them to allow for more innovative advancements in technology that are code compliant..
  - Make both codes equal.
  - Leave changes to code people not politicians.
  - Not exactly sure, but would love to be able to see a FFPC book that references the FBC codes. Or maybe one book subdivided.
  - Provide better information on approved products. Each should have complete installation instructions. It is difficult to find these at times.
  - Limit "Florida specific" changes to absolute minimum.
  - Similar as stated in number 2 above.
  - Get rid of the Existing Building Code book. It is so confusing, and no one interprets it the same. A few guidelines are all that is needed. Also, it sounds as if lawyers are writing the book. The code has gotten extremely hard to interpret and is can be conflicting from one area to the next.
  - Try to identify the conflicts and correct;
  - Consolidate Residential, Existing and Building into just Building.
  - Consolidate Residential, Existing Building and Building.
  - Publications of the mid-year and glitch amendments are available too late. And the volume is overwhelming.
  - Adopt the International Codes.
  - Stop the competition with ICC and NFPA and better align fire and building codes.
  - Training, Training, Training. Only one or two hours of code training are required every two years for licensees depending on the profession. At least half of the required hours of CEU's for license renewal should be in the code. One of those hours should be in the code development process. If most

construction industry professionals were familiar with the code development process there would be more involvement.

- When determining the areas needing revision the process should not look at those areas where it is not a Florida specific need or where the base code is in agreement with other model codes.
- Would like to promulgate use of the ICC.
- Stop issuing revisions/changes between the dates of the three year code period.
- Provide the Code on time and do not provide a glitch amendment in the middle of the triennial period. Rather than working on glitch sheets use that time to modify the Code for the next cycle.
- A continued effort to reduce those discrepancies between the building and fire code. I feel this has been very successful so far. I would like to see a stronger stance from the building code in regard to residential fire sprinklers, which has been adopted on the national level in the fire code and ICC.
- Restrict changes to once every 3-5 years. Use the ICC as the base code.
- Eliminate as many of the Florida amendments to the base code as possible and focus on code changes at the national level.
- Adopt the international code and leave the Florida Specific out all together. Adopt the national electric code as the state and mandate the latest addition. Do not allow special interest to be involved.
- Streamline the process somehow and limit input or time of presentation to a specific limit, which would move items along faster.
- Updating every 3 years.
- Get complete and right before releasing it the first time.
- Issue codes in same year they are dated. Only one set of updates within a one-year period following issue date. No more changes until next code update. That will provide a two-year window to start preparing the new code, without issuance delays.
- Put someone in charge of the committees that has the ability to get things done properly.
- Correlate FBC and FFPC to reduce/eliminate conflicting code requirements. At times, the FBC is actually more restrictive than the FFPC. Often, these restrictions are expensive on the builder/developer, yet do not provide a higher level of protection for life safety or property protection.
- More knowledgeable plan reviewers and field inspectors in the interpretation and application of the Code and better supervision and accountability for both.
- Go with ICC codes and amend specific Florida regional items.
- Remove local control over wind loadings for specific areas and include them in the code.
- Get rid of all the sweet heart deals for special interests. An FBC is written and then immediately amended. This is crazy.
- Create steps for resolving these issues that the first tier of review officials can follow. Allow them to use common sense! The officials we have worked with all seemed to genuinely want to help, but didn't seem to have the authority to do so without consulting someone else first.
- Equalize the product approval process and criteria. If there must be a difference between HVHZ and all other areas, then make the criteria for both clear and equal so there is a STATEWIDE baseline standard of performance for each. Encourage plan reviewers to follow similar interpretations. Publish interpretations of major issues for all to reference.
- Simplify and revert to a base code with provisions for the areas in Florida.
- Make training and outreach a high priority.
- Remove the ability of legislature to make modifications outside the code process.
- No opinion here, steady the course.
- Return to the base code on a tri-annual basis, and adopt that version within one year of publishing. Further, create a separate Florida supplement that would be updated on the same three year cycle for consistence, education, clarity, convenience and reduce costs.
- Additional training and spot checks on the enforcement.

- Reduce the influence of special interests, and stick with the national code.
- It would be much better if the FBC codes could be issued sooner so that we are more in the same cycle with the IBC code version that is being used in most other states.
- Simplify government regulations and create a Code that make buildings safer and forget stupid details/dimensional items that have no contribution to safe structures.
- Find a way to educate the Contractors and Design Professionals. Leave some latitude for home rule.
- Education for both the public and private sectors.
- Get rid of private provider. It is subject to abuse by incompetent or unscrupulous individuals who are looking to keep getting hired to do a job and are being paid by the very ones that they are working for. There needs to be independent oversight. Let them hire the consultant, but make the County Building inspectors and officials responsible for the buildings. The same for schools who have their own inspectors. It is a travesty that they are allowed to govern themselves. We have seem numerous abuses of this system and CHILDREN are at risk.
- Adopt the ICC when it comes out. Publish a minimum of FL specific changes in a SHORT addendum simultaneously! Better yet trade off w/ICC and get them to incorporate a HV wind zone in their (our) code to clinch the deal. Then publish a VERY SHORT addendum that addresses FL specific issues.
- (1) Keep the codes in their present form for which they were written & established for. (2)Limit the times it can be commented on.(3) MAKE the TAC team or a member that has submitted the request for the code change be present at the Florida Building Committee to explain the basis or intent of the code change within part or associate code(s) related. This also needs to apply to all code request changes by any manufacture or product distribution. All products seeking code approval must first complete a Florida product approval certification.
- Have the Building Code mirror Fire Code.
- Restrict subjects to those that are Florida specific, such as: - Issues mandated by the Legislature or State agencies - Compatibility with the Florida Fire Prevention Code - Other issues specific to Florida, such as hurricane force winds, heat and water intrusion, termite protection, etc.
- Continued adoption of sound and reasonable construction and engineering requirements.
- Include more detailed information on the Department of Business and Professional Regulations webpage. Specific areas need to be expanded to include additional information and testing.
- Code: Needs to return to the base code with a minimal number of modifications that are truly Florida Specific. Commission: Needs more members that are experienced in construction and code enforcement. DCA Support: Replace staff with third party contractor. Enforcement: Needs more state funded training. Code cycle needs to be completed within one year of publication of the base code.
- Nothing to add apart from the comments above.
- Find a better way of vetting the individuals who sit on the Building Code Council, Building TAC and Fire TAC. I have attended meetings for each of the committees and several of the members appear to have very limited knowledge of the Codes or their intent. Some did not even know why or what they were voting on. There also appears to be individuals who are only interested in special interest and base their decisions on what it will cost or opinion rather than facts and unbiased data. A good example would be representatives of the schools. Their votes appeared to have nothing to do with safety, just cost and protecting their turf. This will sound ridiculous but educate the legislature as to how little they know when it comes to life safety and construction.
- Licensing and continuing education for construction superintendents, and changes to contractor licensing laws to include specific requirements of what constitutes supervision by contractors.

## VI. THE FLORIDA BUILDING CODE AND THE CODE DEVELOPMENT PROCESS

How well is the Florida Building Code and Code development process working?

Ranking Scale	5	4	3	2	1	Average
Total	37	94	113	38	29	3.2

### 1. What is working well with the Florida Building Code and Code the development process.

- Staff support, meeting organization and facilitation.
- The process is open and transparent.
- A model is set up and we follow it to a tee...then we cross our fingers and hope all the free volunteer work we do in the interest of public safety does not get killed by the legislature who sometimes plays politics wit issues all in the name of "this is the way the game is played".
- The fact that we have one, flawed as it may be.
- New interpretations and reasons for explanation are being incorporated at a frequent pace.
- We should not be investing governmental effort in tweaking codes, but rather in enforcement of rational codes, even if they may lack some specific we feel necessary.
- Seems like the Commission and committee process functions well.
- They send out plenty of notices.
- Conflicts and misapplications are beginning to be addressed and clarified.
- Provisions for public input.
- Having the Code available on disk is extremely valuable. It saves time and aids in finding Code issues. The Code is substantially more definitive and complete. Cross referencing and definitions are better. Including ADA and Life Safety issues in the Code is good.
- The code change process has improved over the years.
- it is always necessary to have a standard to which to adhere.
- I am kept up to date about what is happening. This allows me to inform our sales staff of impending changes that could impact cost.
- It is getting better but I see things implemented without full consideration of their ramifications, and them hasty modifications.
- The development of a comprehensive regulatory document.
- responsibilities are clearly stated, lots of work goes into the development process.
- Understanding and listening to the concerns of the market place.
- Development information is readily available.
- The legislatures do what they want with little or no input from the code officials.
- E-mail updates and conference calls.
- Do not have experience with need development just follow what is sent.
- Have not been involved in the development process, so it is hard to comment. The development process, from a technical standpoint appears to be good.
- Proposals are listed online.
- Three year development cycles.
- The entire process and each persons ability to address the process.
- Easy to enter data.
- Frequency.
- Code development cycle except for the glitch cycle which had arbitrary rulings on whether a change was a glitch or not.

- Customer input.
- Having the interest groups meet and discuss issues is very valuable.
- The Internet submission process helps facilitate input, review and comment on the various individual ideas regarding changes and "fixes" to the codes.
- The process
- It seems that the Florida Building Commission has a far greater authoritative grasp of the building code process than their fire service contemporaries.
- The development process of the code works fine and should be left alone once it has been printed and adopted. The glitch amendments need to be put into the next upcoming code change instead of constantly putting out new amendments.
- Electronic notification of meetings and subject matter is effective.
- It is good that it is revised and that anybody can add comments and that those comments are analyzed by a board before it is approved.
- The development process is satisfactory and the periodic updating and enhancement of the Code to respond to time and new requirements is a must.
- The continual review of ongoing issues and new technology.
- The technical groups assigned to develop the Code seems to be adequate.
- Updates can be submitted and reviewed for inclusion.
- The information about what is going on and the process is quite helpful.
- Overall process is working well.
- Up to date with the newest technologies included.
- The TAC's do the real work. The experts on these committees is really how our codes are developed.
- The ability of the code to be revised each year.
- New and existing issues are brought to the light.
- All of it.
- The modification process is very user friendly.
- I have not been involved in the development process.
- Everything is working well beyond my expectations.
- The recent web site developments are wonderful. Much better cooperation and communication between industry, contractors, designers, building officials and fire marshals. Better consistency in interpretations of the code.
- There seems to be adequate notice of the process and information as to what is being considered.
- Not sure.
- Standardizing requirements across the state.
- The process is always dealing with old technology. I participate in both systems and the Florida process is always behind, and has never come out at the same time as required enforcement dates. It does not work well.
- Florida does not need its own code.
- The 3 year cycle.
- Not much.
- Building Code and Code the development process is working well.
- Constant re-assessment.
- Nothing. Too many changes. The code as written is fine. It does not need to be changed in total every three years.
- It seems to be getting better at meeting the required deadlines.
- Generally works well and is responsive.
- See above.
- Important issues are making it into the Code.

- The interaction between the fire code and building code officials.
- Not involved with this process, I only see in field inspections how building code effects fire standards. It's hard to require something that was missed in the review process after CO has been issued. The fire inspector has to make due with what is left.
- Currently the plans are being submitted to our local building department and reviewed by the Life Safety Plans Reviewer.
- Fire department input in plans review of new construction.
- Issues are brought forth and include both building and fire input.
- The TAC committees have begun the process of coordinating the requirements of the Florida Building Code and the Florida Fire Prevention Code. However, more work is required in some areas.
- An avenue is presented for change as needed.
- Developmental meetings.
- Good meshing together of the fire and building code.
- Coordination with other codes, specifically the fire code.
- The Code is good, covers almost all area, it is continually under scrutiny.
- By adopting national codes by reference into the Florida Building Code has helped with interpretations and understanding the intent.
- Members give lots of their time in developing code.
- That they are trying to develop common codes.
- Alignment of fire and building codes.
- Input is crucial to the revision of the code.
- Archiving of codes with annual supplements. Future research into what code a building code a building was built under will be confusing if not impossible. This is important for any future changes/ alterations to the building.
- The process seems to be evolving as technology changes.
- I especially like to authoritative controls of the commission by way of comparison to that of the SFMO.
- Depends on the jurisdictional authority.
- No comment.
- The relationship that exists between the Commission and outside agencies like the SFMO.
- Hearings are well advertised.
- Seems to be open for discussion.
- Don't know.
- Providing opportunity for stakeholders to have input.
- The overall process seems to be working well enough.
- Ditto above.
- Florida is a leader in implementation of national standards to protect the people of Florida.
- Not familiar enough to answer.
- Access to information and online tools is working well.
- Nothing.
- Being involved with Plan Reviews.
- Everything.
- DEC statements.
- The ability to have input and actually be listened to is great.
- Same comment as above.
- Nothing!
- Nothing. The process is on-going and would require full time attention to the nuanced writings of the accessory industries and building officials who are writing to promote special interests or conditions.
- I don't know.

- Same as the answers above.
- Identifying the inconsistencies between the base code and the other codes and standards that must be enforced in the Florida built environment.
- Public accessibility to the current code. 2. Consensus code development process. 3. Public input to process. 4. Industry Representation. 5. Product Approval.
- The correlation of change from one discipline to the next.
- People, if able are able to add their point of view to the process.
- Single set of guidelines to follow.
- Difference in code requirements have been greatly streamlined with the FFPC.
- Communication between various interests.
- In general the process is acceptable but greater participation is always to be encouraged.
- Nothing. Too little time and consideration is given to the modifications.
- It appears to react in a timely manner to the need for adjustments to harmonize with changing processes.
- Again, it is a good thing that we have one building code throughout the State.
- Being accurate and consistent with the code interpretation.
- A process does exist to do so!
- Nothing.
- The code quickly responds to events after they occur.
- The standard code is being enforced state wide where a inspector or building official can move to any part of the state and have a good start on what is required in each jurisdiction. The code is reviewed and changed every three years for changes in materials, methods, and needs of the public.
- The process allows for plenty of input from stakeholders...maybe too much.
- Extensive meetings.
- At least Florida is modeling their code after the ICC.
- As a fire official it is hard to comment.
- The publishing of the building code commentary.
- Important changes are added to the code.
- NA.
- New base code every three years!
- The general process.
- The comment and review process is generally functional. Some of the needed changes are implemented in the process.
- I am not involved as much as I was in the development but information and updates by email are excellent. Webinars are a great idea.
- See above comments.
- It is up to date.
- Too slow too many special interests.
- The process appears to be detailed and well thought through. A lot of work is involved in the process. There is a need to pause there are no other conflicts with other codes in place or from other agencies.
- Unifying the code statewide.
- The updates and request for information from the commission staff is frequent and clear.
- The code is easier to apply now than the old Standard Code. There are endless recourses via the internet, DCA staff support BOAF network and commentary.
- The positive to the process is the knowledge base of the people involved in the process.
- No comments.
- Not involved in the Code Development Process enough to comment.
- Same as above, not sure of the difference between the "code system" and "Code development process".
- Nothing.

- Not very much.
- Again, same answer as before.
- Utilizing the ICC building code as a boiler plate design.
- The numbering system is at least correct.
- It is inclusive of other code entities such as the State Fire Marshal's Office in creating more synchronous Codes.
- Yearly write in of complaints is a good idea. None of it is being acted on.
- Not familiar with the process.
- It actually happens.
- I appreciate having input on what is included in the Code.
- Nothing.
- It is currently working toward a more uniform system that does not change so often. It remains to be seen.
- Building requirements being uniform throughout the State has made the development process work very well. Specific direction provided in the code for design and plan submittal has greatly improved the process.
- Hearings are well publicized.
- Not involved with this at this time.
- The ability for special interests to have specific products, methods and materials contained in the code.
- The process permits input from the users.
- It meets the specific needs of the state of Florida.
- This process allows for recommendations to be heard and discussed prior to voting by the committee.
- Positive changes that are making Florida buildings safer for the public increased consistency.
- The TAC Committee is working well. The stage of the Board allowing for TAC items to be pulled and resubmitted are in question at this time. A more stream-lined system would perform at a more efficient speed and help keep code change in their pure form.
- There is an increased level of uniformity in administering the code statewide. Code hearings are easier to attend, since distances are typically shorter. There is more unanimity in how to develop the base code for Florida conditions.
- It is done periodically.
- The Florida Building Code has made great progress since 2000 when it was reorganized to become a statewide building code. This is due to the development process instituted by the Commission for a better building code.
- There is more uniformity in the Code across the state than there used to be but still a long way to go due to differences in interpretation.
- The Building Code is generally easy to use.
- The Florida Building Commission.

## **2. What is not working well with the Florida Building Code and the Code development process.**

- Time constraints to adequately fulfill legislative mandates.
- It much too cumbersome, often not based upon scientific research with verifiable results. Most often based upon a consensus opinion rather than demonstrated fact. It is much too political and driven by the agency itself.
- The Florida specific amendment process creates complications when combining it with the I-Codes.
- Everything works well as designed with exceptions as previously noticed (legislative interference).
- There is no need to keep trying to reinvent the wheel.
- The myriad of amendments to the code, and the fact that it is years behind in its implementation.



- There are too many revisions. Every time we turn around we have to buy another book.
- The development process is driven by the insurance carriers and abandoned the life safety ingredients for occupancy/use.
- Our efforts toward revision and insistence on the uniqueness of the Florida exposures divert us from full knowledge of a stable code and from more complete compliance and enforcement. If you want to keep people confused then go ahead and change the rules just a little bit each year...exactly what we are doing. If we don't receive, vet and make annual changes, the bodies charged with doing so lose their reason to exist. The Florida Code is a great example of wasted government effort when a satisfactory alternative is at hand. The model code organization is likely also at fault as they too must also have more people to support all of the "state" codes promulgated off their base. What started out as a uniform code has become only a prototype for governments to play with.
- Again mid-cycle supplements.
- The Code does not need to be changed so frequently. Every 5 years is sufficient.
- Too many revisions and still too many conflicts and inconsistencies with "interpretations" between the FBC and FFPC.
- Too bureaucratic.
- Process is taking too long and is fraught with errors.
- Because the Code has changed so radically each time it has been revised, no one has confidence in its consistency. Codes Administrators tend to err on the side of caution which usually means a more restrictive interpretation. Owners seem to find it too complex or confusing, so they try to skirt compliance altogether. They will often try to hire unlicensed Contractors or try to get work done without a permit. Quality Architects, Engineers and Contractors endeavoring to comply with the Code are circumnavigated by prospective Clients because they know they can get it cheaper by hiring unlicensed or unscrupulous Designers or Contractors.
- Perhaps the transition to the ICC base code in its entirety has been misunderstood and led to too many Florida specific code items.
- Some areas have become too overly complicated. The code should be easy to understand and follow.
- There are several large manufacturers of buildings that build much heavier modular buildings than mobile home or office that contain high voltage and low voltage distribution equipment, which could help provide some design insights or additions to the FBC.
- Seems that the majority of the work is implemented by political appointees, that little interest is paid to the field people. Codes should be well thought out before implementing them, i.e. the existing building code - it is a work in progress but has much work needed to fix it.
- At code change cycles there are too many changes to the base code with personal preferences. The energy code (which I like) is too complicated for most and not enforced in most parts of the state that I have seen).
- Can get complicated, especially for public.
- Clear definition of who represents each committee.
- Why change a code that would work and is universal for all locations.
- Some changes implemented without public knowledge.
- It is the evaluation and validation process that is very weak. Administrative review is not working. Too many FBC approvals are questionable.
- Need more frequent updates to the software code compliance program, Energy Gauge.
- When you are entering data it takes you to the next screen before you are done selecting other criteria to look up.
- The law should allow the FB Commission to adopt supporting codes such as the NEC as it applies to the FBC. Time gaps in adoption is ridiculous. New codes are almost out before the old one is adopted.
- It is strictly ICC and does not give any other organization a chance to have input.

- Lengthy process.
- The glitch cycle which had arbitrary rulings on whether a change was a glitch or not. We need to not alter the model codes as much as we do.
- Legislative intervention in the code development process is the top problem with the system. Leave the technical decisions to the experts and keep the legislature out of it. Florida specific amendments are also a problem.
- Inconsistent implementation dates, glitches, mid-cycle changes or addition to the codes, delays in printing the code and lack of identification of changes in the margins.
- The Florida Code lags behind the Model Codes.
- Once again, Special interest groups who have no idea what they are talking about are influencing the code development process.
- The development process of the code works fine and should be left alone once it has been printed and adopted. The glitch amendments need to be put into the next upcoming code change instead of constantly putting out new amendments.
- No reason to not use I.C.C. codes.
- We "The Code Enforcement" people are too busy in our daily duties that we don't have time to comment in the code.
- The time that it takes to update the FBC and keep in line with the national standards appears to be long and somewhat tedious.
- The ability for product manufacturer's and other lobbyists to push certain agendas into the code for profit and unnecessary financial hardship on to the general public.
- Too many amendments.
- Insufficient input from Architects and Contractors.
- Insurance companies and vendors are having far too much input into what to regulate. You can not totally make people responsible for their actions by legislation. The Code should be developed to maintain health, safety and welfare without becoming a burden on the constituents.
- That it is a process and that few have real access to that process.
- Updates are not always given a complete review. Also, too many supplements. NEC adoption is at odds with the FBC schedule.
- There is still too much effort in creating "Florida Specific" amendments to the code. More emphasis should be on updating the base code at a national level.
- Installation of archaic and outdated information.
- Too many code officials see it only from view point and usually are not willing to accept another point of view.
- While it is an advantage to have updates each year, it also creates a training issue for code officials and design professionals to keep up with the changes.
- Mid cycle code changes are hard to keep track of.
- Too much micromanagement, political interference, and over analysis of even the simplest of code amendments.
- Legislative involvement in the code development process. The legislature should not write code. Delays in adopting the next edition of the Florida Building Code to keep up with the model codes. Codes should not be adopted prior to the published version and electronic versions being available to the users. Too many glitch changes. Too many Florida specific code changes. Florida is not that different from the rest of the nation. The lack of updates and improvement to the Florida Accessibility Code.
- Too many special interest groups on the committees influencing the code development.
- The fact that we are always so far behind the most current edition and standards. .
- There have been recent rumblings about some in the building industry wanting the requirements for plans to be approved by a State Certified Fire Inspector before a permit is issued being removed from

the Building Statutes. This would be a grave mistake that would jeopardize life and property safety in the State. It will cause a severe wedge to form between the fire and building officials as well as public outcry when occupancies that have just received a CO are shut down, cited, or fined because they don't meet the minimum Life Safety and Fire Code requirements. The system we have works fine now. I would strongly advise not to change it.

- Too many 'exceptions' - i.e. High Velocity Hurricane Zones - it just moved the old Miami-Dade codes to their own special section. Does not make it a 'statewide' code.
- It is not current.
- Florida does not need its own code.
- Special interest groups lobbying for things that are not needed.
- Out of date with nationally enforced IBC and NFPA standards.
- Is the Special interest groups taking out life safety codes to suit their own agendas.
- Cost considerations.
- Too long, too many changes, too many legislators instead of code knowledgeable people. Confusion is created. The cost of travel and the ability to commit time is very limited due to economic conditions. The ability of special interest to impact the code changes such as stacking a room with fire personnel to get residential fire sprinklers added is clearly evident.
- Need to ensure that the code development process is kept on task and on schedule.
- Should be run by the State.
- Florida product Approval can be confusing at times.
- The number of modifications to the national code that causes the adoption of the most current code to be behind schedule. This causes the state of Florida to be behind the times with adoption of the most current codes.
- Not in the process.
- The thought of wanting to eliminate the fire department from reviewing plans, inspecting buildings and development review.
- Florida legislature deleting certain requirements for the Life Safety Code.
- It seems the building code implementation schedule is woefully behind. Not sure why.
- Too many glitch amendments. They are still conflicting requirements (primarily in Chapter 9 of the Florida Building Code) between the Florida Building Code and the Florida Fire Prevention Code. Fire alarm requirements in Chapter 11 of the Florida Building Code have not kept up with technology.
- Not enough participation from the knowledgeable professionals.
- Timely communication of meetings --Michael Couture, Palm Bay Fire Rescue, Fire Marshal
- Way too many code amendments.
- Lack of transparency with non-binding interpretations.
- Should be more cut and dry. District/Asst. Fire Marshal/Plans Examiner
- Code development is not a problem. Jurisdictions need to survey their zoning codes so there is no conflict with the building code. In most cases, it is not the Building Code that is a problem it is the Zoning Code and the interpretation of the code.
- Do not believe they are considering safety as the most important part.
- The elimination of the fire sprinkler requirement in single-family residential occupancies will result in overall higher fire protection cost for all citizens and taxpayers.
- We are running typically 2 years late of code updates. The current system is too cumbersome and political.
- One issue is the budgetary restriction on the number of inspectors. It is also important that plans reviewed be done by persons trained in each discipline.
- Adoption must be done in a more timely manner.
- The effects of the changes to construction methods and application of the code seems to have a trend to reducing the fire resistant nature of construction.

- The code development process is okay but the method by which information is put out for comment, is unwieldy and hard to understand as changes.
- Conflicting codes and jurisdictions and plan check and inspections from the building departments and the fire districts!!!
- Delays in the process and running behind cycles.
- Website is not user friendly.
- The inability of code professionals to participate in the process more. Commercial and residential construction business interests have hired lobbyists to work strictly on code issues.
- Too much discussion.
- The method of receiving and tracking approved revisions.
- Suggestions from people who profit from the building industries looking for ways to obstruct implementation. If they are successful it will only take one fire or hurricane to prove the code should have been implemented as intended and not weakened.
- Too frequent and the codes are always implemented well after the year they are supposed to be.
- The code change process is too complex and exhausting. Glitch fixes need to be limited and adoption of all state/nationally based codes needs to be performed at the same time.
- It is too cumbersome. Way too many hands in the cookie jar -- way too many "Good ole boys". You've got to be kidding.
- Time lines for adoptions.
- Sometimes it seems special interest may have more input than common sense and or safety.
- The process is too slow. The political interference is out of control.
- Everything. The day-to-day Architect is getting left behind because the Code Gang is round the clock grinding out new code.
- I don't know. It seems we are just adopting ICC requirements.
- The time lag and delays in issuing updates and revisions needs to be improved.
- Building code enforcement with public school board
- Political and legislative interference in the code development process.
- The wind design let's keep it simple.
- Takes too long and special interest is sending, yes paying people to attend, speak and vote their way.
- Sometimes too vague in the interpretation and not enough people readily available to provide interpretations.
- Advertisement of code hearings.
- Too much influence by select groups who benefit from what is or not required by the code.
- The addition of anything that comes directly or indirectly from legislators or special interest groups (insurance group/realtors, etc.).
- Takes too long to get the latest codes adopted. Too many changes that should go through the ICC code change process. Too many glitch amendments.
- The whole process needs to be properly funded and supported by an educated support staff that can provide guidance to the committees.
- There are still some areas where it needs to be compared with the FFPC and a common position taken.
- Inspectors need more training and be held accountable.
- Some feel that such process is a little too bureaucratic. As suggested above, some complex or specialized design needs exclusions or qualifications in relation to applicability. Likewise, deminimus structures may need an out from being a "structure" one example would be certain types of "coastal engineering".
- Write the Code, adopt the Code and then live with the Code until the next version is adopted. Don't change the Code every year with blue pages, yellow pages, etc.
- To many changes, overwhelming at times. Chapter 13 Energy HVAC has become a nightmare.
- There is a strong sense that we need to "Upgrade" the requirements with every cycle. This is what allows

manufacturers to come in, convince a group within the development process that the manufacturers product is needed and it becomes a requirement, ensuring the manufacturers business and increasing the cost of construction.

- The process of updating the code does not come out in a timely manor, is changed before the books make it to the public.
- Too much modification to the base ICC codes.
- Some requirements are not clear on all issues.
- Too many amendments requiring extensive meetings. All amendments to the national model code should be Florida specific only. There are very few if any Florida specific reasons to deviate from the national codes.
- Florida works way too slow. Effective Code writing must be instantaneous, otherwise the implementation is always a day late.
- Went to 2 day code thing in September. Thought each member had their own issue not the codes issue.
- It takes too long. The Building Code Development is Constantly holding up the process. Last update it was about six months behind the Fire Code. This creates a problem where Developers and even code officials don't know what to enforce as well as a period where some buildings are constructed that don't totally meet the code because one code has yet been adopted to support the changes in the other.
- You only get the input from legislators who don't know construction.
- Way too long.
- Still have many code sections that are left open to interpretation.
- Need more input from the fire side to make a better code for all.
- Takes to long.
- We get three years of changes at once from the base code and then make more changes to satisfy Florida special interest. Everyone involved in code development have to split their development efforts between ICC and Florida which is a waste of resources. The ISO ratings for every community in Florida suffers a loss because we adopt a code more than three years old.
- The comment, review and glitch amendment process is onerous at best. When it takes a 1,000 plus page glitch amendment to clear up the inconsistencies in the code there is a problem with the process. Because of the process when Florida adopts their next addition we are automatically 3 years behind.
- The national Electrical code should be adopted in the year it is intended to be adopted in. There are safety reasons for a quick adoption.
- Very nice web site and is user friendly. Again, make sure up to date information is provided on the web site.
- Too many non-trade persons sitting on the board.
- Too many lawyers and engineers, not enough trades people.
- The amendment and adoption process is monumental without additional benefit. Florida lags behind the I Codes by 3 years and at tremendous expense for no additional value.
- The length of time allowing comments would be shortened if the Codes were better aligned with ICC and Fire.
- We seem to have gotten away from Building Code basics. We seem to have a mind set of, If something is not very likely but could possibly happen, then we need another code requirement. We can't make all construction totally hazard proof. Unfortunately some things just happen and that will always be the case.
- There are special interests involved too many times in the process. The process takes too long to adopt in a timely manner.
- Less change is better.
- The adoption of the next cycle of the building code appears to be delayed beyond the triennial term.
- It is cumbersome, duplicative of the national process, and to political.

- You purchase a code book then you must purchase several hundred pages of changes. When the code goes in to effect no changes should be allowed.
- The time it takes to modify the boiler plate design to accommodate the Florida requirements. Why not include the HVHZ requirements and other "costal" into the ICC code and adopt the code. Code cycles are too frequent. Why can't revisions be utilized when a change is necessary?
- Final review of code prior to issuance.
- Right hand has no idea what the left hand is doing.
- Again, lack of consistency between FBC and FFPC. Also, FBC is extremely slow in adoption process. Runs a minimum of 6 months behind FFPC, yet these two documents are to work hand in hand?
- The ability to implement the approved changes in a timely manner and the "egos" of some of the committee members tends to get in the way.
- Take heed from the building industry regarding code modifications and enforcement.
- As an architect I have MAJOR problems in the field getting contractors to follow the building code. A test on the code needs to be part of all contractor and CM certification.
- Timing and cost of replacing the code set every three years.
- It would be nice to be able to have some workshops at the local levels about upcoming changes or additions so that we understand what is coming and can provide input.
- Too many special interest groups involved with the process.
- Florida is not as different from the rest of the country as many tend to portray. Codes have been complicated rather than simplified. The goal of making the code uniform throughout Florida has resulted in varying interpretations that tend to frustrate contractors. A code section should be written so that a six year old could understand it, not needing interpretations. Most code officials are not even aware of the process and the task of commenting on the codes seem daunting. More education should be provided directly to the building official. Most do not voluntarily admit their shortcomings.
- The process is arduous and confusing. The construction industry as a whole does not know what the requirements are due to annual updates and changes. DCA staff works very hard to simplify and clarify what has become a bureaucratic nightmare. Understanding of the code between designers, contractors and enforcement personnel is unattainable due to frequent changes and inconsistencies with the base code. Designers working in other regions are confused by the inserting of yellow and blue pages that change the intent of certain sections without the clarity of knowing how or why a change occurred. Education is difficult due to the length of time required to get courses accredited, then go through the licensing Boards and then to advertise, register and present the classes. By the time an advanced class can be presented, the code has changed and the class is not permitted to be modified.
- Cannot get people to participate in the process.
- Some of the committee members appear to be bias or uninformed as to the proposals.
- Legislation that would weaken the Code.
- You're kidding; we are going on five years out of synch & still have a screwed up, unusable code! The whole process is broke!
- The Florida Building Board Of Approval, the large members to the board and the wide spread issues that appear before the board I believe are the most confusing agenda of all. If items or code changes to be added to the Florida building code must be categorized and presented in a manner that they are related to the code and to the code reference to which they apply. The Hearing or meeting I attended items were presented in such a disorder that have the board members were either confused or disorganized, this noted and enhanced by the type of question that were being asked before the vote was taken.
- In an era when resources are scarce, too many resources are used to duplicate changes to the base code. - There is too much of a time lag between the IBC and the FBC editions. - Yearly revisions make it difficult for all parties involved to ensure code compliance. The following comments apply to the Dec. 6-7 meetings: - Code development hearings did not appear to follow Robert's Rules of Order. - Facilitator's

directions were unclear, but continually repeated. - Voting members had to ask Facilitator, "These are my intentions. Do I need to vote 'Yes' or 'No' at this point?" - Code modifications and amendments to modifications were not kept clear for the voting members.

- The process succumbs to much to political pressure and special interest instead of focusing on what should be the main purpose, construction of structurally sound and Life Safety friendly buildings.
- Commission members do not understand issues. TACs do not have any authority and waste time and resources. DCA staff spend too much time and resources manipulating the commission.
- I attended the Dec. 7th Florida Building Commission where Code modifications were considered and was frankly appalled! The Technical Advisory Committees are supposedly the committees of the experts and their recommendations seemed to have been ignored as much or more than they were followed. The various layers of considerations from the Code modification to the TAC recommendation and then potential amendments along with whether the motion was to support or deny whichever layer the motion addressed was totally confusing. It seemed to me that the subject of the vote and the result of a yes vote vs. a no vote got so convoluted I had serious questions as to whether the commission members had a clue what they were voting for. That was evidenced when, after a 25 minute discussion of the vote, a commission member raised his hand and asked "now what does a yes vote mean?" This system has GOT to change! People are likely finding their vote did not mean what they thought it meant. Also- and this is hugh- the annual updates have got to stop. It is hard enough to digest the Code in 3 years time, much less have it changing every year. And the Florida amendments to the ICC base code have got to be reduced to the point where amendments really are only those specific and unique to the unique conditions of Florida. All other Code changes should go through the normal process at the ICC hearings and Florida should come in line with the national codes, not go down a trail that takes us farther and farther from the rest of the country on issues that aren't based on anything unique about Florida. Every proposed code change should not be considered until there is proper rationale for it addressing some issue that is unique to Florida such as hurricane issues. If we could get back to base ICC codes we could get in sync with the most up to date codes rather than lagging behind a whole code cycle.
- Florida Changes..... other than the changes that are in place to eliminate conflict between fire and building codes there are very few changes to the Florida codes that are really necessary.
- It is not independent of the Florida Legislature.

### **3. Respondents specific recommendations to enhance the Florida Building Code and the Code development process.**

- More money and more time.
- Initially base it upon the IBC without Florida specific revisions. Require that it be left stable for at least three years with no revisions of any kind. Let it work! We have never had a code that was stable for a sufficient period of time to actually determine what works and what does not work. The energy to tinker and revise has been much too hyperactive since the initial process. Any revision should be based solely upon sound and defensible research - never upon opinion.
- Minimize Florida specific addmendments and provide an independent supplemental publication for Florida specific.
- No changes works great...let it work...stop interfering.
- Publish fully descriptive comparison between proposed code changes and previous code section.
- Stop the state code development process in its tracks, stop trying got reinvent the wheel. Use the in-place IBC code development process.
- The process is fine. But again it seems a bit redundant to redo all the IBC is already doing.
- Get back to the basics: life safety, health and welfare. Don't micromanage.
- Th entire code should be available on line so we don't have to keep buying books. The on line code

could be constantly updated. There should not be any charge for this.

- The more we move toward a standard international code, the more we can incorporate those standards into universal software such as Revit. This benefits good design because we can spend less time researching codes and more time on creative exercises, LEED implementation, and client satisfaction.
- The government of legislating the building code and its statutes has complicated the process but has united the field of users. Strive to better communicate the newer changes and create more continuing education courses for addressing the questions from the users. --Bennett Shuman, AIA
- Retreat to the standard version of IBC.
- Adopt the IBC.
- Send everyone home for one year after the new Code is published.
- Fully coordinate the FBC with the FFPC and make the interpretations clearer.
- Eliminate the TAC process.
- Stop making wholesale changes to the Code! Think about our competition in this environment. All the foreign workers in this country and foreign manufactured products are being produced in an environment where workers are not as mature, trained or well protected as US Workers. Foreign workers have been trained to accomplish specific repetitive tasks, efficiently, accurately and at very little cost because of no OSHA, EPA, NFPA or Building Codes. No wonder all of our manufacturing has gone overseas.
- Eliminate as many Florida specific items as possible to align more closely with the international community and the ICC.
- Simplify it - it is too big. Do not leave anything open to interpretation.
- Add a special category of Modular Building that house electrical equipment.
- Never enact something until it has gone through a series of reviews.
- Stay with the base code except for hurricane and wind requirements.
- Concentrate on what end result is the most beneficial to public safety.
- Refer to survey question 1 response 3; and an illustrative version such as that provided by NFPA 101 would assist young professions and contractors in better understanding intent.
- Private practice chairs for specific sections of the FBC.
- Do away with the Florida codes and adopt the ICC codes.
- If possible, give affected parties some warning in advance.
- Encourage building officials to send the front line workers (plans examiners and inspectors) to the hearings.
- Give Florida the mission in total and let them do it.
- Allow the Uniform Codes a chance to present their codes.
- Rely more on the IECC for many parts of the code already published.
- Instead of a glitch cycle, allow any change to be made and approved but consider waiting till the next published cycle for implementation (allow commission discretion for life safety and certain other criteria). Don't wordsmith the model codes to death Don't worry about deleting sections or data not relevant to Florida. Make changes affecting FL at the I-code hearings.
- Set up key meetings via teleconference so that all participants don't have to travel to the meeting site (i.e., TAC meetings, Commission meetings, etc.).
- Florida specific amendments in the codes need to sunset every three years. This will force the commission and TAC to look the true need for Florida specific amendments. Florida specific amendments are typically a problem because they create unintended consequences. Allow the commission to have full control over the accessibility portions of the code. The accessibility code is a mess.
- Stick to a true 3 year cycle for adoption with enough lead time for those of use to get a handle on the changes while still doing a full day of inspections and reviews.
- Go back to identifying the changes in the margins or highlighting them like the NEC does. Otherwise we



have to read the entire code and compare it to the old to check for changes.

- Get into cycle so that the current Code is the same as the Model Code plus Florida additions.
- A greater level of communications and working relationship with fire service interests would be helpful.
- Start doing what is good for the people and the economy.
- The development process of the code works fine and should be left alone once it has been printed and adopted. The glitch amendments need to be put into the next upcoming code change instead of constantly putting out new amendments.
- Adopt ICC code, have standalone wind codes.
- Stop some of the special action requirements for splinter groups with special interests. It seems we almost had to add special sprinkler systems for fire in single family homes. Fortunately this was stopped. The arc fault detector for more than the bedrooms was not stopped.
- I think that it should be a duty of the Building Officials to encourage comments from Inspectors, plan reviewers and chiefs from the code so each city send comments to the code. We more than any other industry live the problems daily, but we don't find the time too comment.
- Move towards a smoother implementation of the IBC synchronization with the Florida needs. Determine what aspects are close enough to the IBC that Florida can simply incorporate as our standards. Work on removing sections of the Code that are not pertinent any more.
- Realistic and real life evaluations of proposed code changes. For example, the idea of a fire sprinkler system to be required in every single family residence is a great idea for a perfect utopian world. However, when you add the realistic scenario of providing the water lines to each house, maintaining the system, possible accidents/leaks, use of an already diminishing resource of water, and the financial burden, then it isn't feasible.
- Develop stricter criteria for code amendments. "Florida Specific" doesn't seem to be working.
- Provide more information to architects engineers and contractors for their input. Do via email.
- seriously needs a better and more transparent interaction with practicing architects, engineers and contractors.
- Mesh the NEC adoption with the FBC. Reduce supplements or extend code for longer time period.
- Direct code change proponents to the ICC so as to limit Florida amendments.
- Limit hearings on the technical amendments and move on.
- Get more hands on people on the TAC.
- To reduce the number of updates for each cycle. To get back to the base code and reduce the number of Florida specific requirements. To limit the number of participants for the development process so that it is not a one-sided affair. In other words, limit the number voters from a specific group and let each specific group have the same number of voters.
- Smaller panel groups with complete experience and knowledge in the trade and enforcement thereof. Remove outside political interference since herein lies the problem. Particularly remove those who have no clue of what a hammer and nail is much less mixed separations and engineered systems.
- Sunset ALL Florida specific code changes every three or six years and force re-adoption if there is a true Florida specific need. Do not automatically continue the current Florida specific code changes into the new code. Streamline the time frames in the code adoption process. Need to find a way to update the Accessibility Code Provisions in a more timely manner.
- Some way has to be found to streamline the legislative delay in adopting the code.
- Adopt IBC without revisions.
- Go with the base code and strive to concentrate the states efforts to get these code changes as the BOAF has been working on with limited resources. as a person how has participated in the code change process since 1966 I believe I understand the Process and a proponent of uniform state code.
- Use ICC International code.
- Keep up with IBC/ICC as the model code. Filter special requests through TAC groups.

- Be up to date.
- Stop the special interest groups from lessening the life safety codes. This would also include any statute that would do the same.
- Cost considerations.
- Create a way to simplify the process and allow for input from those who cannot be at hearings. Limit the special interest influences-such as fire services.
- Stay as close to the national code as possible.
- Keep the fire department in the process and stop procrastinating when it comes to life safety. The longer they wait to implement a requirement the more money it will cost in the long run and in the mean time the more lives it will jeopardize. Including our loved ones. It will only take one tragedy to make you change your way of thinking. Why wait for that to happen?
- Code development process working well. Florida should adopt the Life Safety Code in its entirety.
- Remove the design requirements of Chapter 9 of the Florida Building Code or coordinate those requirements with the requirements of the Florida Fire Prevention Code. Remove or coordinate conflicting fire alarm installation requirements for mercantile occupancies. Remove the fire alarm notification requirements of Chapter 9 and Chapter 11 in the Florida Building Code in favor of the requirements of NFPA 72.
- Provide for wider participation in the creation of standards.
- Make sure meetings are announced to outside professions consistently.
- Something must be done to reduce the amount of code amendments. While we continue to add new provisions to the codes, we don't take a serious look at obsolete or older code provisions that may be removed.
- publish on each months interpretations on line.
- Reduce the language and make it black and white, remove any vagueness. Bonita Springs Fire Control and Rescue District/Asst. Fire Marshal/Plans Examiner
- The Building Commission, Building Officials, State Fire Marshal and Fire Officials need a conference/Seminar to meet once a year or every two years to network. This would allow all of us to better serve the citizens of Florida.
- Even the sides in the process of code development. Development, planning, building and fire should all be included.
- Adopt the requirement for the installation of a fire sprinkler system in all new one and two family dwellings.
- More inspectors and broader authority to inspect existing structures. There should also be increased penalties for work without permit including criminal penalties.
- Adopt the International Codes with Florida specific amendments, this will allow much easier archiving.
- Continue the bifurcated system (FBC and FFPC) to provide a fire-safe environment for the citizens to live and work in.
- Work as closely as possible with the SFMO's office to make the two codes more seamless, keeping in mind how important this is, can't be overemphasized. The fire service is stuck with a building for life once the C. of O. is issued, so no effort up front is too great to consider. Consider doing everything possible to delete duplication of services. Perhaps best identified in an ad-hoc or technical committee forum, duplication of services is problematic in many areas. For example, exhaust hoods, who should really review plans and issue permits? In years past, my B.O. and I worked out an arrangement this way; if the hood was exhaust only, i.e. no extinguishing system, the building department cared for that in whole. Conversely, if the hood included an extinguishing system, the fire official cared for it in its entirety.
- Developing a concurrent appeals process between the development process and State Fire Marshal's Bureau of Fire Prevention.

- Make the changes more clear by titles and words and not just sections or TAC modification recs.
- Put the fire marshal back into fire work not building work.
- The statewide code can only be uniform when state code forms are uniform.
- Have a more user friendly website and more advertisement of the issues.
- Require voting by representatives of the various jurisdictions on code amendments, with weighted votes for the jurisdiction based on population.
- Discourage loud mouths offering their ideas of convoluted nonsense.
- Consensus agreement between building and fire code as to what constitutes a mixed occupancy and separate occupancies as it relates to schools; especially assembly type spaces.
- Make sure that qualified and professional regulators are doing their jobs for the benefit of all Floridians.
- We need a 5 year cycle. The 3 year cycle is expensive and just about the time that code enforcement officials, engineers, architects, start to be more proficient with it another whole new code comes out. Which of course is always larger. Its not that change is bad. But the three year cycle is horribly inefficient and extremely uneconomical.
- More code change education and training is needed.
- Same as above -- trash it and adopt the ICC systems and Codes.
- Working together.
- Publish the FBC and do not allow changes until the next code cycle.
- Adopt and use the ICC.
- Simplify it and leave it alone.
- Do away with the Florida code development process it is a duplication of services, costs the State a lot of money, the real code development process takes place at the Code development hearings with ICC.
- More funding for code promulgation, maintenance and education. Set achievable goals given the reduction in resources.
- When I started Building back in the 60's we had one small pocket size code book. Those buildings are still standing. The building code reminds me of government. It grows and grows and grows.
- Let the model codes develop, then choose one on a state level to adopt.
- Call centers staffed with more knowledgeable people.
- More advertisement of code hearings ~ so more can attend and be heard.
- Limit number on committees to equal representation from all stakeholders.
- Again, I suggest a 5 year code cycle and prevent the "growth" of the code into areas that do not directly relate to life-safety issues.
- Use the ICC codes and their code change process to avoid additional cost by the state to maintain its own code and code change process.
- In the development process, do a side-by-side review of the FBC and the FFPC and address conflicts at that point.
- Adopt the ICC.
- I like BOAF's new proposal to use ICC codes and issue a Florida specific book.
- Require a cost benefit analysis and or pay back analysis based on a thirty-year payback period including interest and the expected life of the product.
- Have the commission work sooner on changes to hash out any changes to the code before publication, so all the codes are more in line with the ICC time frame.
- Work toward eliminating Florida-specific modifications...not adding more.
- Require Florida specific justification for each code change.
- Adopt the ICC Code in its entirety. If amendments are required for Florida specific situations, let ICC incorporate them into their International Code.
- Have the building and fire code agree.
- Go with ICC codes and code officials will have input into the code development process instead of

legislatures who don't know construction.

- Our specific (FL) changes to the model code should be carried over to the next cycle.
- Florida should adopt the ICC codes as is as soon as they become available and only keep the two "Florida specific" chapters. Florida Energy Efficiency Code for Building Construction, and Florida Accessibility Code For Building Construction.
- Adopt the IBC as it comes out. Involve people in the ICC review and adoption process. We don't need to reinvent the code.
- The 3 year cycle should be coincide with all other codes in a 3 year cycle. Make sure it matches the other codes out in the field not to create a conflict. Give ample time for notifying inspectors of up coming changes.
- Follow more closely the ICC code.
- Eliminate the FBC and adopt the I codes.
- Make sure all Stake holders are well informed regarding the schedule and process. e.g., architects, engineers, contractors, code administrators, fire marshal.
- We should extend the code development process to every six years instead of every three years.
- Due to the fact there are so many pages in the glitch cycle indicates to me that more review should take place before the adoption of the updated versions.
- Address modifications to the base document only in areas where there is a Florida specific condition or where there is a conflict between the base document and other adopted codes in the state.
- Would like to promulgate use of the ICC.
- Inform municipalities through advertisement and/or training of the opportunities to be involved in Code Development.
- Possibly having a set date, unless if this prevents the process of resulting in the best adopted set of revisions.
- Restrict changes to once every 3-5 years. Use the ICC as the base code.
- Building Design.
- Eliminate as many of the Florida amendments to the base code as possible and focus on code changes at the national level.
- Adopt the International Code in its current version and leave it alone.
- Change the rules or make new ones which will expedite the process.
- Eliminate the residential code. Require all homes over 5000sf and all duplexes to be by a registered architect. Require architects and engineers to sign-off prior to issuance of CO.
- There are entirely too many chiefs and not enough Indians.
- Get the adoption/ implementation of code to align with FFPC.
- Develop a method to fast track the changes with less "red-tape" and potentially have an arbitrator or third party supervise or monitor the code development process to keep the "egos" in check. Also the voting method to accept or reject changes to me can be improved. To have acceptance or rejection of a proposal depend on who and how many individuals show up to where the voting is taking place seems to be very susceptible to manipulation.
- You need to debug sections of the code that are in conflict with each other. e.g. Glazing on exterior exit balconies in condos. NFPA has provisions in conflict with FBC. Revised ADA standards conflict with FBC.
- Also ask the question if the code has interfered with development. At times this is a good thing - but not always. Having a record would allow that data to at least be collected and evaluated.
- Increase the revision period from every three years to every five years or more or don't make revisions effective until the issuance of the next cycle. Make all revisions effective once at the same time/date each code cycle and not at interim periods within each cycle.
- Hold local workshops that Architects can participate in.

- Go to a basic code with overall provisions to comply with the actual needs of the consumer.
- A study group should be appointed to determine why there are so many different interpretations of the code language prior to implementing new code changes. From my perspective, most issues arise from the Florida specific changes not being written very well.
- The State should provide better direction related to the administrative portion of permit expiration and permit renewal.
- Keep the state legislature from making specific changes outside the committee process.
- Ensure any modification to the base code is truly Florida specific and meets the criteria for such change. Create a separate Florida supplement that can be prepared independent of the published document in order to expedite the process, decrease costs and make the process more streamlined. Allow changes to be made only on a three-year cycle after going through the code modification process. Prohibit statutory language or changes that would preempt or modify the code. This will create the need for code changes to be thought out, allow for implementation and training before modifications would be made and create a consistent environment for training, education, enforcement and application of the codes.
- To stop allowing every interest group to modify IBC codes. Let them do it at the national level.
- Send out summaries of the topics prior to the meetings for both the public and committee members.
- More input from a local level on proposed changes.
- Limit it to ONLY FL specific issues and refer all other issues to the ICC.
- Stream line the process of code change. (2) Redesign the order of the board. (3) Limit the process of the TAC committee, manufacture or Product items want to be input to the building code(Guide lines) for all to follow. (4) The presentation to the board must be in reference to the code section, use, and the enhancement of the change. (5) a member of both committees must be present to represent their side of the code change. (6) If a member is not present then the code change is given (1) one chance to be tabled and revoted on.
- The maintenance of existing structures is not addresses in the code (101.4.5 Property maintenance. Reserved). The code does not address the issue of unsafe structures. (SECTION 115 UNSAFE STRUCTURES AND EQUIPMENT RESERVED).
- Have more input from municipalities, and less input from special interest groups.
- Only deal with Florida specific issues. Leave all other topics to the IBC.
- Return to the Base code. 2. Move modifications to a supplement and remove those modifications that do not address a Florida Specific need. 3. Eliminate TAC and hold hearings with all commissioners present. Technical council could be available as needed 4. Code cycle needs to be completed within one year of publication of the base code.
- The TAC groups need opportunity to verse the committee on the reasons/rationale behind their recommendations. It seems that some visuals during the Commission considerations of Code modifications would greatly increase the clarity of what the motion, what they were voting on, what a "yes" vote means and what a "no" vote means. Spell it out so that everyone gets on the same page and reduce the confusion.
- Cut back on the number of Florida changes that are approved unless it is for eliminating conflict. Using the criteria chose the code that provides the higher degree of safety or better construction.
- Code changes should be voted on and approved by building officials in a process that is used by the ICC and previously by the SBCCI. And it should not be subject to changes by the Fl Legislature.

## VII. THE FLORIDA BUILDING COMMISSION

How well is the Florida Building Commission functioning?

Ranking Scale	5	4	3	2	1	Average
Total	48	96	111	32	17	3.4

### 1. What is working well with the Florida Building Commission.

- We are closer today to uniform code enforcement than ever before in the history of code regulation because of the Commission venue.
- Accessibility appeals and declaratory statements.
- The facilitation process and conference call for TAC meetings when the agenda is limited. Also the accessibility waiver and Dec statement process works well.
- Most current technologies and innovations being used...consensus is reached and the public is served well,
- Seems to be doing an adequate job.
- Unifies all in the process.
- It provides employment for staff, and importance for commission members.
- They send out sufficient notice to changes.
- They meet regularly.
- Good input from all of the TACS, well thought out discussion, good input from staff, stop unnecessary regulations, improve existing regulations, delete unnecessary regulations, listen to the public for their input, add changes to the code to protect the public.
- They must be in some ivory tower! Their primary task seems to be to create and update the Codes, no matter what! Increasing costs for construction without concern for the economic environment is not a good thing.
- Everything the Commission does is above board, professional and fair.
- The Commission communicates well. That is most appreciated.
- Never been to a meeting, but read the minute and it appears that the board is doing a very good job.
- Fairly well organized.
- Active in the building community.
- Just another bureaucratic organization.
- Willingness to answer questions.
- I like all the updates I get via email. They are informative.
- Decisiveness of decisions, number of issues dealt with.
- Chair, facilitator, and staff work well together.
- Conference calls have generally worked well.
- Conference calls that have been tutorials have been very helpful.
- Communication between interest groups.
- For home inspection certification- new law passed- how can you have a one and two family license issued by the state to do every inspection on new construction- and not be grandfathered in to do home inspections, someone can sit in a classroom and get qualified- this is why people think government is a mess.
- It seems that the building code commission has a far greater authoritative grasp of the building code process than their fire service contemporaries.
- Consensus Building Technical Advisory Committees.
- The employees from the DCA are very knowledgeable and do good recommendations to the board.

- The contributions of the Commission to the organization for the industry standards are undeniably positive. It is working exemplary well, and the Florida Building Code is the representation of such good work.
- The consistent notification of public meetings.
- The Commission is working well in light of the sharp decrease in funding.
- a half decent on line accessibility.
- From the meetings I have attended the commission seems to function and interact well in moving forward on issues.
- Overall working well.
- Florida Building Code.
- The staff!
- Public is allowed to be involved in the process and the meetings are run great.
- All of it.
- Good communication.
- Better organized.
- The facilitator's skills and ability to move the group have made a HUGE improvement in the process. Staff is very supportive.
- The member seem to be well versed in various disciplines which allows for informed decisions.
- The Commission works well but is hamper by the way the law was promulgated.
- It is not needed.
- The process of formal hearings, appeals and rulings.
- It does exist and that it does strive to foster uniformity among all jurisdiction.
- Is the special work shops around the state, vary good locations.
- Safety concerns and again always re-assessing safety issues.
- They are becoming better organized.
- The commission works.
- Declaratory statements.
- Code updates.
- Provides a forum for all parties with a direct interest to be heard.
- The Florida Building Commission is providing transparency in their meetings.
- Thorough examination of the proposed changes.
- Development of a good Code with safety in mind.
- As a Fire Official, I believe the Commission is working well and needs our support for future code development.
- That they are trying.
- FBC is doing a great job .
- Seems to function well.
- As noted above, I especially like to authoritative controls of the commission by way of comparison to that of the SFMO.
- The Commissioners are fair minded and well versed in the code.
- They adopted the international building code.
- They are doing a good job of reviewing materials, listening to their stakeholders, and responding to the needs, to the best of their ability, with the limited resources at their disposal.
- Nothing.
- Gets job done.
- Communication of meetings and topics of discussion.
- They meet regularly.
- The implementation of the Florida Building Code.

- Ability to appear and make comments for concerned issues.
- The commission is working really hard and seems to be getting better organized with each code cycle. Reports and online communication is really good.
- Nothing.
- The process of consensus building is a good process.
- Nothing. It is an abstract and remote entity from my practice.
- We are getting more rulings that work for consistency.
- The cross-section of membership for broad-base input.
- The staff and leadership of the Commission have a strong level of commitment to the process notwithstanding the significant cut-backs in funding.
- I am surprised they can come to a consensus with all those board members.
- Seem to be embracing technology.
- Updates in the reporting. Triennial reports. Communication has improved but can improve further through broader communication.
- Not familiar enough to make comment.
- The informal interpretation process.
- They issue timely informal opinions at no cost.
- I think it is good that the Florida Building Commission tries to address the conflicts between the Building Code and Fire Code. We need a body to resolve those issues.
- I think overall they are doing a very good job.
- Citizen and user satisfaction has been high.
- Very little.
- The declaratory statements are helpful to interpret the code. The Florida building codes are close to that of the international codes.
- The process for declaratory statements and accessibility waivers.
- Strong attempts to make the system work.
- They do a great job with what they have to work with.
- As a fire official it is hard to comment.
- Updates on the code.
- All looks good.
- Commission's availability to dec statements.
- The commission functions well.
- Trying to please everyone is difficult but there is always an effort put forth.
- It has come a long way. To have nothing and attempt to get it together in the short life time speaks volumes.
- As a current commissioner the diversity of the commission to me works very well. You get to hear a different perspective than what you have. I have to admit sometimes during commission meetings when I think I know what's best for the State of Florida, someone makes a excellent point that never entered my mind.
- Right now there appears to be balance on the Commission.
- They listen well and have not heard of many complaints.
- The ability to provide a waiver from vertical access.
- I have limited experience due to time in my position. My only input would be the influence the building industry has had on fire sprinklers in residential occupancies.
- The Commission is working very hard, but have too many constraints.
- The Florida Building Commission works well with the State Government and also has a very good rapport with the individual entities; municipalities, counties, districts and all Government body.
- They meet regularly.



- Slow.
- I have not had any problems or heard any comments to make me believe it is not working well.
- The online information is very accessible. Not sure what else the commission is involved in.
- About as well as any inefficient government / quasi-government board (i.e.: not great)
- Ease of contacting personnel.
- All issues are discussed in length and public input is possible.
- Review process,
- The Commissioners seem to get along well.
- You can get informal questions answer on code issues.
- They function fine under the guidelines given, but they should be directed to avoid all the Florida specific changes.
- The number of hearings concerning the Code updates and potential changes.
- Appears to be working well.
- The thorough investigation of tabling items based on hear say and not information that is presented in Electronic, paper or digital fashion. The commission has been very good at weeding out issue that are not relevant to the building code. They have tried to move at a better speed. they have tried to maintain a steady flow of information to all personal involved with the code changes.
- Product approval at the state level.
- They attempt to do the right things in most circumstances.
- The Florida Building Commission is performing the task of managing the development and administration of the code very well. Their work has enhanced Florida's construction quality, and provided better health and safety for all citizens. The new Florida Building Commission has strengthened and increased the enforcement of the building codes in the State of Florida.
- I think that apart from the Building Code which is a primary concern and function of the Commission, it functions relatively well with the other things it considers.
- A few educated individuals that keep the goal and intent of the commission in mind when making decisions.
- The code is acceptable.
- Addressing the issues of construction.

## **2. What is not working well with the Florida Building Commission.**

- Insufficient time to accomplish work.
- The entire process is flawed in my opinion. If the code was allowed to be stable there would be very little for them to do routinely except deal with appeals and declaratory statements.
- I think the travel mileage recent changes creates a further inconvenience and has questionable cost savings.
- The citizens are fortunate to have such a wealth of knowledge for free at their disposal watching out for their safety and well-being.
- it is a complete waste of a substantial amount of time and money.
- Has elevated its role to complexity and multiple exceptions.
- It is wasted time and effort that in the end is counterproductive.
- They are doing unnecessary change.
- They are the broken cog in the wheel.
- They meet regularly.
- Sometimes the legislator places time lines on our staff that makes their job harder and can cause problems in the construction.
- Legislation has an affect on the duties and responsibilities of the Commission. When legislation requires

the Commission to create code to specific percentile, the affect is less and diminishes the code change process.

- Seeking input manufacturers who make specialized buildings as ready to install for AC and DC power distribution according to IEEE, NFPA, NEC, ANSI, and ASTM standards.
- Controlling changes to base code.
- May be out of touch with reality.
- Enforcement.
- Little or no input from the code officials.
- Decisions to change approval process should be communicated better.
- Product Approval system.
- Far too many conventions and/or meetings.
- Too many minor issues to be dealt with.
- Need to get agendas published on the web sooner, at least the blocks of time for each TAC and the adjournment of the Plenary session.
- No specific fire service representation on the commission.
- On March 1, 2002 we began the implementation of the Florida Building Code with the idea that one uniform code will make consistent enforcement throughout the State. In reality, the SBCCI Codes, even different editions were used, provided for a consistent code. The real challenge is not the code but bringing 67 counties and a lot of municipalities to a common understanding on how to implement the code uniformly. Instead, the FBC takes the position, in many instances that it is up to the local building official.
- The FBC allows the privatization of the Building Official by private companies. This undermines the public office, period.
- Private providers given too much leeway with little building department overview. Homeowner contractors should be required to qualify via a test.
- There seems to be a total misunderstanding of the requirements of what design professionals do. The actions of the Commission a year or so ago to permit Interior Designers the right to sign and seal drawings for building permits shows a total lack of understanding of education and experience to construct buildings. Politics should not become the primary reason for Commission actions.
- On-line reference to the code's referenced standards - no one has a complete code reference library.
- Commissioners do not seem to be as well prepared as they should be.
- Too long for decisions.
- Certification approval process.
- Conference calls.
- Influenced too much by special interests groups and politicians.
- Meetings do not start on time. People show up late with no concern about the people waiting for the meeting to start.
- Still not friendly with fire code officials and fire and life safety initiatives. We as fire marshals are not the enemy despite opinions to the contrary.
- The decisions of the commission are not communicated very well down to the local government. DEC statements answers, plans for code development process, etc need to be distributed via an electronic newsletter to all interested parties.
- I believe there is still a gap, even if perceived that fire officials are not behind the commission.
- The commission is not given the support it needs to function due to the way the Law was passed.
- It is not needed.
- Lobbying for special considerations.
- I don't here form them until the adoption of a new code cycle.
- Is the Special interest groups influencing the Florida Building Commission to taking out life safety codes

to suite their own agendas.

- Cost considerations.
- Has the appearance of being run by the construction industry.
- Leaning too far to accommodate the construction industry. Negative impact on life safety.
- Keeping an unbiased opinion of the proposal changes.
- Need to minimize changes.
- I believe the Commission and Fire Officials need to work together to develop future codes that meet the demands of today.
- That they are trying. Without a clear idea or direction that is safety first for all buildings.
- The FBC seems to have its roots in the construction industry and overstep its bounds as far as recommending changes to the fire prevention requirements.
- They are never 'on time'.
- To even consider taking the Fire Service out of the new construction process is shameful. The fire service is the one organization whose sole purpose is to protect life and property, in that order. Part of that goal starts in the plan review process and inspections of new construction. There have been many times that I have reviewed a set of signed/sealed plans that were designed by an architect and signed by an engineer that did not meet the requirements of the Florida Fire Prevention Code. Some of these errors would have been quite costly if found after the building was built and had to be retrofitted. The fire service reviews the plans to protect the occupants of the building but also to protect firefighters and the needs of the fire service, example fire department access to the building. I think it is ironic that there are certain people that would like to build a building but expect the fire service to respond, enter the building they built and fight a fire. Of course you will not see these individuals taking on this task, they have made their money and are long gone. Doesn't it make sense that the people that are going to respond to the building in an emergency should have a say in the way the building is built. They have the most to lose and most certainly have a say in how it is built.
- Limited manpower and resources hinder their full functionality. Uninformed or improperly informed Legislative input forces less than desirable product. Lobbyists can dominate the opportunities to speak to the Commission.
- Out of date code cycles.
- Product Approval website.
- They are captive to a flawed development system.
- I hope the Commission will hold its ground even during hard economic times. Every one is hurting, but do not let self-interests water down what has previously been done.
- The commission is slow to respond and react to needs in the industry.
- Everything --- let go -- we are not unique, we do not need the extra levels of a government that wants to exist purely for appearance.
- Too many changes. Too many people needing to make changes. The best game out since Chutes and Ladders.
- Too many committees.
- Too much time is required to code development.
- Teleconference meetings.
- They are not communicating to the masses. What happened to them sending out a e/mail or mailer to let us know what is going on.
- Not able to get universal acceptance. Need to negotiate with agencies like the FDEP more.
- The length of time to sometimes get an informal interpretation.
- I think the Commission hears too much from construction industry and may act too early before considering the regulatory agencies.
- too many layers of the decision making process.

- Time for the process is not as short as could be.
- Egos.
- Very little is known about them.
- The commission is still vulnerable to political pressure and special interest groups.
- Too much emphasis on "code development", "amendments", and "updates".
- Special interest influence. Does one industry have preference over others. I recall significant influence from a construction product stakeholder who had a close relationship with a House leader. The freedom to upgrade or totally change the current system.
- They are too slow with the code development process.
- Too many members do not know construction.
- Need to recommend or try to implement local ordinances etc. into the code.
- Special interest groups have a large influence on code decisions.
- Legislative and Executive branches of Florida's government mandating a requirement and the commission tasked with figuring out how to apply the requirement. All when the commission as a whole may disagree with even having the requirement in the first place. The commission is the appointed experts let them make the decisions in regards to the Florida Building .
- The Commission entertains recommendations from special interest groups.
- Their meetings should be held where audience can sit down and better hear what is being discussed.
- The time it takes to obtain a waiver when the Board only meets every two months.
- Too many meetings discussing too many code changes too often.
- It is cumbersome, duplicative of the national process, and too political.
- The way the current rules are they will always be behind.
- I have not participated in the Florida Building Commission to a great extent but the sacrifice in time and effort put forth, from what I can see by listening to the BOAF discussion group or at the BCIS site shows a great commitment to all of us in the industry.
- Way too much power building among commissioners.
- Process for awarding design work.
- Very slow in expediting the adoption of code in cycle. Constantly postponing implementation date.
- The Commission seems to modify the Code for their own enrichment rather than for the betterment of the building industry.
- You need to start dealing with new technology e.g. Fabric Tensile Structures, Green Building Standards, high strength concrete etc. The FBC is always late coming out, so one never knows what is grandfathered in or not.
- Lack of public awareness regarding what their scope is.
- The public is not heard over the special interest groups from outside the hands on people.
- Need improved certification processing time.
- Too many special interests with each one looking out for themselves and not looking at the big picture or what is best for Florida.
- They are not the most timely in their response.
- The influence of special interests changing basic IBC standards and codes.
- Politics and wasteful spending.
- Uninformed members and/or bias to issues.
- If they are responsible for the code they are doing a poor job.
- No uniform order for their items or the code changes for which they are presented to the board.
- -Code development of non-Florida specific topics. -Amendments to the Code should not be part of the legislative process.
- Declaratory statements are hard to obtain. Time taken to receive a declaratory statement may exceed the construction time available and the cost incurred with work stoppage to wait for an answer.

- Commission chair need to be subject to term limits 2. Commission members need to have building construction and code enforcement experience 3. Code hearings need to be held with all commissioners, not TACs 4. Commission work plan needs to be limited to Florida Specific issues 5. Commission needs to be financially supported through permit surcharges not book sales 6. Bureaucrats need to stop manipulating the process.
- Apart from what I stated above under Code development, I question the effectiveness of individual members in dealing with things that are not in their area of expertise. It seems to me that there is not much time or explanation that allows them to really grasp the issues.
- Too many uneducated or special interest individuals on the commission that only focus on protecting turf or saving their special interest groups money by reducing the requirements of the codes for no reason other than money.
- It is not organized to provide the best, safest codes for the citizens of Florida. It is organized so there are representatives of certain "stakeholder" groups on the FBC regardless of their code or construction knowledge. It is organized politically rather than functionally. Also, the FBC is not the final decision maker on the Florida Building Code, the FL Legislature is. This results in some code decisions being political rather than based on fact.

### **3. Respondents recommendations to enhance the functioning of the Florida Building Commission.**

- Hone it down. Reduce the size to a manageable size and use only commission members that possess demonstrated professional, technical and scientific expertise on the commission. The Commission probably need not be larger than six to eight persons.
- Stay the course, all works well.
- Eliminate it.
- There has to be a more simple process for servicing the Florida users. Perhaps more inactive software for research and topic questions.
- Termination.
- Send everyone home for one year after the new Code is published.
- Revamp it; get rid of it. Give it required deadlines with consequences if they are not met.
- Let them be the source of advice on code application only.
- I felt that if a TAC votes unanimously to approve or deny something that the entire board should take that vote seriously and not simply override it. We have members on these TACS because that is their area of expertise.
- Leave the FBC's budget alone!! Stop legislating the code.
- Consider requiring education to be in line with the license's held and require adequate amount of hours per license (14 not enough for multiple license's).
- Focus on what is needed for public safety (end result).
- Enforcement staff.
- Adopt the ICC codes in their entirety.
- Meetings should be every month.
- Consider using professional engineers, on staff, to review product approval application.
- More conference calls or web connects.
- Get agendas on the website earlier, at least the time blocks for the TAC's, Workgroups, and the Plenary Session. Detailed agendas for those can follow slightly later. We seem to deal with an incredible amount of window related issues: 2/3rds of all windows made in America wear an AAMA label; put AAMA staff on the Commission to enhance the process. Even if it is a non-voting appointment, it would help.
- Add two fire service individuals to the commission.
- There should be a State Building Official just like there is a State Fire Marshal. The Office of the State

Building Official would provide direct support to the local Building Officials in the performance of their duties. The relationship between BOAF and the FBC is more about sharing the wealth and less about us being successful as Building Officials, which is the key to the success of the Florida Building Code. All the codes and rules in the world won't matter if we can't enforce them because of the political game or lack of local support from the FBC.

- Would suggest that the DCA staff would assist the Commissioners on follow-up with specific tasks assigned to each Commissioner to make it easier for the Commissioner to respond to the FBC needs and tasks. I sometimes find it difficult to figure out where I can help.
- Other sources of funding for the commission to operate on need to be identified.
- A more comprehensive on line access to the code and ALL referenced standards, statutes and rulings.
- streamline the process. Stop special interests.
- Make the certification requirements black and white...not up to the board to make a determination.
- More meetings face to face.
- Attempt to remove special interests and politicians from pressuring the commission.
- Improved input from fire officials.
- Remove turf wars between Building and Fire. Basically get rid of the egos and power trips both sides seem to have developed over the years. View the relationship of Building and Fire as a cohesive relationship of understanding what code will work best and why it works well. In my city, the relationship I have with our building official is communication and collaboration resulting in who's enforcement provisions are best suited for the customer and not our egos. The good ole' boy approach no longer is viable in this day and age. Create a cohesive relationship understanding the parameters of responsibilities, enforcement, and authorities. Fire needs to be an effective stakeholder in FBC and FBC needs to be an effective partner in FFCA and FFMIA.
- Keep the facilitator contract. Some of the best money that has been spent.
- I would like to see a more prominent role for the fire service as far as membership on the commission.
- Takes too long for changes to be approved and issued.
- The Commission should be more of a review board for code disputed as well as approving continuing education programs. We should not be producing a new set of code books and not calling things that are not code specific that does not deal with natural uniqueness.
- Use ICC code.
- Keep the consensus process in our FBC code development process.
- Needs to be better plugged into the general A&E build community.
- To not allow this type of action.
- Keep up the work toward getting the group more solvent and in line with the required deadlines for the development process.
- Should be run by the State.
- Include NFPA codes as written in code adoption.
- Work closely with the fire service.
- Create the Office of The State Building Official.
- Review the language to make the Code simpler to understand and to be more specific.
- Include all parties involved in the construction fields.
- Continue the bifurcated system (FBC and FFPC) to provide a fire-safe environment for the citizens to live and work in.
- There needs to be more fire department or fire personnel on the commission if the commission has input of fire related codes.
- Also noted above, do everything to make the commission's activities more closely aligned with those of the SFMO's.
- Developing a concurrent appeals process between the development process and State Fire Marshal's

Bureau of Fire Prevention.

- Better communication between all parties involve.
- Update the code every 6 years... 3 yrs is too often.
- Ensure members understand the purpose and are committed to that purpose.
- Provide them with more resources and autonomy. Limit lobbying opportunities to the Commission. Adopt the ICC with Commission involvement limited to Florida amendments.
- Stay with the ICC code cycles and basic code books. Leave all of the personal, political and nonsensical activities out of the process.
- Organize website so data is sorted and accessed in smaller amounts to make it faster and easier to find information.
- Quit trying to have a Florida code base on editing to suit the several interests involved in process.
- Every one is hurting, but do not let self interest of water done what has previously been done.
- Access to the commissioners via "town hall meetings" or other informal sessions is needed across the state on a wide range of topics.
- Restructure ... get rid of the present Commission -- add new blood -- all Code workers ... Start over .. accepting that what we have doesn't work.
- Eliminate the Commission.
- I believe the Commission should have more power to give interpretations that are binding.
- Meet once every 10 years.
- Set achievable goals given the reduction in resources.
- Now that is big government in progress.
- Cut the staff in half, as a reminder to the rest to work for the good of us.
- Utilize authority better.
- They need to adopt a stance on preventing code requirements from "slipping in the back door" via legislative/statutory action.
- Streamline decisions---make a decision.
- Look at the process and see if the time for more routine actions can be shortened. That does not mean that complex policy and changes should not receive an adequate amount of review time.
- Adopt the ICC.
- Limit input from politicians and lobby groups.
- Keep politics out of the code adoption process - this is about safety and property value, not getting re-elected.
- Give them the freedom they need to improve and enforce the proper systems. A little help from the President would go a long way also.
- Work closely with fire officials.
- Speed up the code review process for code updates.
- Adopt the ICC codes so they are written by code officials and not legislatures who do not know or understand construction.
- Adopt The ICC Code.
- Provide a Fire Official to serve on the Florida Building Commission as one of the members. This would help to avoid conflict between codes and create an understanding between codes.
- What I propose of course would require action by the Legislature, therefore I'm not holding my breath but here goes: Make it a violation of Florida law to use funds collected by the Florida Building Commission for purposes other than Florida Building Commission or Florida Building Code business. Make the necessary changes to put the Florida Building Commission fully responsible for what goes in the Florida Building Code. Legislative and Executive branches of Florida's government should not have any say "what so ever" over what goes into the FBC.
- When a small business wants to lease an existing space on a second floor they often find out about

vertical access at the last hour. Many times they are spending less than \$5000 for minor modifications to suite their particular business. The AHJ should be allowed to waive vertical access based on disproportionate cost. It seems a waste of time and energy to apply to the Florida Building Commission when almost always they grant a waiver for vertical access based on disproportionate cost.

- Restrict changes to once every 3-5 years. Use the ICC as the base code.
- Follow the ICC model and not have politically appointed commissioner making code decisions.
- Adopt the International Building Code and leave it alone.
- Provide more outside help.
- We need commissioners that can function as a team.
- Pay 3 short listed firms to do concept designs. Require at least one impartial jury member.
- Utilize the commission for specific Florida issues and keep us current with the ICC.
- LISTEN to the industry people, the architects, engineers and contractors regarding the needs of the industry.
- Add a link that explains its function/roll.
- Don't be so influenced by the insurance companies. they already hold us all hostage to there 'legalized racketeering' agenda in the name of 'Health, Safety and Welfare'.
- Seek input from the actual people involved with construction. Cut down on hearings and time to process a new code.
- Get the legislature away from code writing.
- I do not know if there is a "fix" for this. Both NFPA and ICC appear to have similar problems at times during the process. The voting process at ICC helps to eliminate many of the special interests and may be a good model for Florida. A vote of the stakeholders for the final decisions, not the members of the Commission would be a good start.
- To reduce the amount of changes allowed to IBC.
- Disband it and just use the IBC without all the local politics of South Florida and other regions. Save a lot of tax dollars.
- Find individuals that truly want to be there for the purposes of having a Code that is specific to Florida's concerns.  
Eliminate it.
- Smaller board. Provide information for only what is on the agenda.(example: a gentleman stood up and wanted a water restriction on faucet(S) & toilet(S) in Miami-Dade County for HVHZ zone. A restriction more strength that the ICC code already) a County or City can already adopt a more strength guideline if they desire. The commission or the State does not have to enter fear with a locale agenda.
- Eliminate the influence from special interests groups.
- Utilize the IBC with minor Florida supplements.
- Develop a system to issue declaratory statement in a timely manner.
- Term limits for the chairman 2. Stronger criteria for commission members 3. Reform the code development process 4. Reform funding 5. Reform commission support with a third party administrator.
- Seek ways to better inform the Commission members of the pros and cons of the issues. Perhaps a venue for the various sides of the issue to present in writing their concerns and the background of what they wish to achieve. I'm not sure what venue or means exists currently for this to happen.
- Stop using the commission to modify the code except where the changes are needed to eliminate or reduce conflicts with other codes. The code that provides the highest degree of life safety or better construction should prevail. Florida is not that unique that we need our own codes.
- Majority of the FBC should be code officials.



## VIII. LOCAL ADMINISTRATION OF THE CODE

How well is the local administration of the Florida Building Code functioning?

Ranking Scale	5	4	3	2	1	Average
Total	69	106	84	35	15	3.6

### 1. What is working well with the local administration of the Code.

- A better understanding of the process has led to more consistent code interpretation and enforcement.
- Only the fact that it is local and usually convenient.
- While there can still be different interpretations I don't get near as many complaints about differences between jurisdictions. I also think the informal interpretation process works well.
- Generally they play well with friends...Declaratory Statements clarify positions when they stray off the road.
- The code is clear and relatively easy to interpret. Therefore more uniformly administered.
- The ability to regulate at a local level.
- They have jobs even if most have left the private practice.
- In my experience the Code officials and staff try hard and are generally successful in properly administering the Code.
- Plan review and inspection is generally consistent with the exception of SE Florida.
- It is confusing as ever.
- The building department does a great job. While commercial department is slow but still does a great job.
- Overall, Local Codes Administrators seem to be trying to administer the Code with proper discernment and care. However, this changes from City to County and within surrounding counties. One of the primary objectives of the Commission has been thwarted by the Codes being constantly and significantly changed every time a new one is issued; and the supplements and /or addenda are unbelievable.
- The FBC is providing the information.
- It is fine as long as building reviewer's adhere to the code.
- The administration appears to be streamlined well without a lot of unnecessary management levels and red tape.
- The local administration seems to be working well with the code.
- Inspectors generally know what to look for.
- Many of the communities we work for use a pick and choose method of enforcing the FBC.
- Having a book is good.
- Flexibility to obtain "one time approvals".
- Building officials are now accepting FBC product approvals more uniformly than a few years ago. Acceptance of the system seems to be widespread.
- Most inspectors/plan reviewers are knowledgeable and able to interpret the codes. The BOAC site is great.
- Most jurisdictions interpret the code well, efficient.
- Adhering to the statewide code.
- Access to local officials.
- More consistent interpretation and enforcement has occurred since the FBC has been adopted. The BOAF informal interpretation process and the BOAF email discussion groups have gone a long way toward solving these issues.
- Self-administering is going very well, local agencies pretty much play by rules.
- Much improved consistency in code requirements across the state as compared to prior to 2001.

- no response.
- Generally, there is consistency from one permitting jurisdiction to another.
- I have no direct knowledge from which to comment one way or another, suffice to say that in my jurisdiction, things appear to be fine.
- The local administration of the code works fine.
- We generally have uniform guidance from the towns of Crestview, Fort Walton Beach and the County.
- In my City we discuss any issue that arise and look for the support of the Miami-Dade Code Compliance Office and of the Department of Community Affairs.
- It is great to have a common Code regardless of jurisdictions.
- No troubles.
- Greater quality of formal training for code officials and inspectors - therefore a much more professional group.
- A state-wide code is being used for plan review.
- Local enforcement is good generally.
- Allowing the latitude of the CBO for decision-making.
- Consistent application.
- Not much.
- I believe that it is working well at the local level.
- Our city building dept works well with fire officials to ensure the needs of the public, building officials and fire officials are met.
- Most of the count workers enforce the code properly.
- It is the wishes of the local's not based of a code 1000 miles away with not idea of the local issues.
- New construction compliance.
- All of it. Good attention to Code compliance.
- Effective partnerships with Building Official in comparing and contrasting the differentials of the code language agreeing to the most stringent applications. Communication is the key.
- Better cooperation between Fire Officials and Building Officials. These relationships are much improved over 15 years ago. The BOAF informal interpretation process in so very valuable. This helps all parties resolve interpretation issues quickly and easily.
- There seems to be good cooperation between building and fire officials.
- All Building Departments have the same Building codes to work with.
- The local Building Official working with the documents in spite of the way it has been old technology and always late and the number of irritations that have occurred edition after edition.
- It is not interpreted consistently.
- Administrators seem to be adhering well to the principals of the code.
- Increased professionalism and .
- The same code allows for discussion between jurisdictions without local code revisions in an effort to create consistency.
- It is slowly getting better.
- As above. Generally even enforcement.
- The Code is being administered.
- I think the code is being enforced in a more consistent manner.
- Local building official demonstrates respect for and works with local Fire Marshal to ensure fire codes are met.
- Code enforcement, local input into code changes.
- On a local level our Building Official stays very informed.
- We have a great CBO currently who believes in the importance of fire prevention. Is willing to meet on a regular basis to resolve any conflicts between building and fire code. Works together to provide unified

- front in meetings with builders/ developers.
- Building Officials and Fire Officials are working closely together to provide safer buildings for the public. Local code enforcement is good.
  - It's available.
  - The Palm Bay Building Official works closely with the Fire Marshal throughout the review and inspection process.
  - Most Building Depts. seem to have a good grasp of administering the code.
  - As a member of the Pinellas County Construction Licensing Board and the Fire Marshal for the City of St. Pete Beach. The Building Official and I work very well together and we attempt to meet once a month if possible to discuss any issues.
  - The building Official and I confer on all buildings and projects and determine who and what needs both disciplines to be involved.
  - In our community we have always had a good working relationship between the building inspectors and the fire inspectors. We recognize each other's strengths and weaknesses and work cooperatively to reduce conflict.
  - Great oversight of the construction in the community.
  - Training opportunities abound for local code officials.
  - Seemingly, it all works well in my agency.
  - Coordination between the CBO, Code Compliance, and Fire Marshal Fire Prevention Bureau.
  - Good relationship with local officials.
  - Our officials are actually terrific to work with, and willing to explain and discuss issues. Ideal!
  - We stay within the code in the school board.
  - The ability of the local government to write their own Chapter 1 to the FBC. The hosting of the codes online. The limitation on technical amendments.
  - Local yokels have to read the code.
  - Suwannee County officials are well versed in code details.
  - Building official has good knowledge of code requirements.
  - The ability to be able to administer the code locally is resulting in projects being completed faster..
  - The volume is being handled in most cases at present.
  - Building departments are becoming more efficient and consistent across the state.
  - There is a hint of Local AHJ – familiarity.
  - Working together with our Building Official.
  - It depends on the AHJ.
  - Available information.
  - Nothing. Its a gotcha document.
  - We are continuing to function in very difficult economic times.
  - It's what we do! Give us a code and we administer it.
  - Accessibility to information.
  - Consistency is getting better. Inspector
  - Attempt to follow it by all municipalities.
  - Good working relationship with building official.
  - Our department concentrates on life-safety issues as a matter of priority and in that area the code is fairly clear and somewhat easy to apply.
  - Keeps the decisions locally, which reduces the length of time it takes to get an answer.
  - An attempt is being made to be consistent.
  - Construction plans reviewers work side by side with fire plans reviewers and address any differences at the plans review stage. Both agree that the most stringent will prevail.
  - I have a good working relationship with the Building Official.

- I believe it is working well.
- Education with the public from the bldg dept and education of inspectors and plan examiners.
- Generally, the buy-in of local officials is very good.
- Quality people at local level.
- BOAF discussion web site a tremendous help in sharing opinions and clarification. This is especially helpful for small jurisdictions.
- Local administration is surprisingly consistent across different jurisdictions.
- Training for enforcement of the code. Most jurisdictions try to keep in line with other municipalities.
- Local officials are easily accessible for consultation and prompt plan review.
- Knowledgeable team.
- We follow it to the best of our ability.
- In my jurisdiction the working with the building official and fire official has worked well.
- Everybody is working out of the same book.
- You adopt and we enforce.
- Building departments with City employed reviewers and inspectors.
- Our County does a great job in administrating the code.
- Having a uniform code throughout the state.
- The local jurisdictions know how best to work with local conditions.
- The process, implementation and enforcement procedures.
- Code officials are proficient with working in the parameters the code allows.
- Most are applying it evenly.
- Fire Rescue and Building Departments working together.
- In the present economic condition, we all are customer friendly and attempt to assist with projects location within our areas. The common goal is not to compromise public safety and work for a common goal.
- One agency rules on all code issues.
- The BCBRA is responsive and fair.
- The good part is that in spite of the hurdles, local administration seems to work..
- The flexibility of the administrative section of the code is functioning well allowing implementation without fee increases.
- Although it's far from perfect there's more uniform enforcement throughout the state than before the Florida Building Code.
- The building department and the fire department officials work very well together in the plan review and inspection processes.
- Florida building code web site is great. Contents of the Florida Building Code and Florida Fire Prevention Code work well together and easy to administer. Few conflicts.
- The enforcement of the code appears to be very consistent among our local building departments in Brevard county.
- Local administration works well. Within a particular municipality with one Code official it is easier to administer the code and be consistent.
- I have had good experience in working with the local building code officials in Manatee County in regard to enforcement of building and fire codes.
- Building Departments are starting to see themselves as a place for customer service, and a partner is completing the safe construction of a building.
- One code.
- We are following the rules provided to us and I feel the work of the Building Inspection, Plan Review and Administration are making the citizens of Florida a safer community.
- Generally the codes are very specific. Which is a good thing.

- The local authorities have the knowledge and ability to oversee the code.
- There are some good people who are very knowledgeable, but not in a position to make a difference or enforce when necessary.
- Those we work with (Leon County) are very helpful, accessible, and service oriented.
- Local answers to local issues.
- We are very fortunate in Bay County to have local administration that promotes open communication. They are very easy to talk with and offer their expertise when asked.
- A written guide to requirement is available to the naysayers.
- The BOAF association is basically the driving force of making the administration work well at the local level. Participation and communication within the BOAF is tremendous.
- All aspects are working fine in our jurisdiction.
- Increased uniformity statewide. Consistent training.
- The code officials have become more knowledgeable and professional.
- Creates many code reviewers in creating government sector jobs who are just putting in time to retirement.
- The fact that the Codes are similar allows for a better and more compliant facility.
- compliance is up due to an extensive educational program and more frequent inspections.
- We focus on public health & safety and try to apply common sense to a confusing and constantly changing reference.
- The correspondence and discipline of the state building code is working better. This is base on that better training has been provide from outlets like ICC, B.O.A.F., F.A.G.M.I., Central Florida Fire College, F.E.E.T., IAEL, State fire College and local chapter(S) of the Building Official Association in several county through out the state. all of these groups are working to improve the safety of homeowners for the state of Florida. Which needs some state funding to help continue these programs.
- There is good cooperation between the Building Officials and Fire Officials to resolve differences that result in plan review or field inspections.
- Availability of BOAF for unofficial code interpretations.
- All local jurisdictions have uniform codes to enforce.
- Local administration of Codes increases the quality of enforcing the standard Building code throughout the state. Local administrators are able to deliver Code inspections and administration in a timely manner.
- One statewide code has improved consistency of enforcement.
- I think that local administration of the code is working, perhaps, as well as can be expected.
- In my experience it goes well with educated officials who are looking at the intent of the code when making decisions.
- It is local, and the building officials and inspectors are licensed.

## **2. What is not working well with the local administration of the Code.**

Funding for enforcement has led to performance deficiencies.

- Local administration is highly variable from jurisdiction to jurisdiction. Often highly variable within certain departments depending upon the individual reviewer and their level of expertise. Competency of personnel is often lacking as a result we are often confronted with overactive exercise of authority and added levels of procedural complexity. An appeal of a departmental decision is cumbersome, time consuming, ultimately expensive and incestuously interconnected to the very department whose opinion brought about the appeal.
- We receive frequent changes in the code or enforcement due to legislative interaction each year.
- Generally things work ok...the locals don't usually try to buck the Commission...when they do things go

to court.

- It is as frustrating to local administrators as it is to design professionals.
- The lack of consistency from jurisdiction to jurisdiction.
- Every jurisdiction has its own way of enforcing the code.
- Every building department, jurisdiction, etc has their own interpretation of certain things - and this is not efficient. There are often conflicts between the building department and the fire department - and neither seem to be interested in working with each other because they are not accountable to each other. The same issues affect zoning - such as "dark sky" policies, etc.
- Never have I ever seen more disparity on the part of those served by the public. There is no consistency and review glitches get missed on a regular basis. The field enforcers are poor at best with little coordination knowledge requiring access to multiple code provisions.
- We ask our local officials, those on the front lines of enforcement, to spend too much time learning what the newest changes are. Less change would yield better enforcement. A modest requirement achieved will be superior to a rigorous requirement not enforced through oversight or ignorance.
- Various building departments interpret differently. They are unrealistic on changes Existing Buildings.
- There are still some discrepancies in interpretation some portions of the code, but most are willing to talk about each situation and strive to reach an amiable agreement.
- FBC and FFPC conflicting interpretations.
- Enforcement of special inspection provisions of the code is inconsistent from one jurisdiction to the next.
- Still too many interpretational differences between building officials and architects/contractors (wind exposure, accessibility requirements). Plan reviewers now desperate to hold onto jobs so they are criticizing things on plans that are petty or not relevant just to make comments and have work for another day. Permits taking longer to get now than they were 5 years ago at the height of the boom. Had an inspector come back twice with the same plan comment that did not even pertain to that job. Building department using canned responses in their plan review system to click on a few comments to show that they have promptly responded to a plan submittal. Relevant comments are welcome and a good checks and balances. Irrelevant comments are a waste of time and a client's money.
- Lack of consistency.
- Because the Code has changed so radically each time it has been revised, no one has confidence in its consistency. Codes Administrators tend to err on the side of caution which usually means a more restrictive interpretation. Owners seem to find it too complex or confusing, so they try to skirt compliance altogether. They will often try to hire unlicensed Contractors or try to get work done without a permit. Quality Architects, Engineers and Contractors endeavoring to comply with the Code are circumnavigated by prospective Clients because they know they can get it done cheaper by hiring unlicensed Designers or unscrupulous Contractors.
- The local administration is not required to stay up to speed on what the FBC is doing.
- Ever increasing requirement.
- Too much code interpretation by building reviewer's. They have gotten to where they do not accept the word of the design professional.
- A better definition of technical resources and how to seek help for those who are new to the process.
- Political pressure and personal goals.
- Too many "fly by night" individuals and companies and natural disasters - sheer volume of work precludes effective inspection and enforcement.
- Some local administrations (Not referring to Tampa) have forgotten the intent of the code and regulate only to the letter.
- Uniformity.
- Getting updates in a timely manner from the State.

- Code interpretations vary great deal. What's acceptable for the State Committee not always acceptable by local.
- Building officials do not follow the code requirements uniformly. I do not believe that will ever change.
- Enforcement of code interpretations that are not correct interpretations.
- This is not generally in the administration of the code but give the Residential, Building and General contractors the authority to install all types of roofing. For God sakes, we let them build almost everything else but they cannot install a simple metal roof.
- Some jurisdictions either don't interpret the code as others do, or can be argumentative.
- Enforcement of window provisions, code requires labels for DP and energy performance. Manufacturers taking the right steps question why they should keep doing those steps if code compliance is not enforced and they must compete with those that don't.
- They still have their own interpretation of the code. what works in one community does not work in the other.
- Coordination across jurisdictions / uniform code application and enforcement: what is permitted in one area may not be permitted in another.
- Still too much local interpretation and variations in enforcement.
- Fire department personnel lack of International Code provisions. NFPA too bulky to use as building code-even fire department personnel are confused by it.
- Too much locale opinions, not consistent.
- Contractors and designers are not learning the code.
- Private Providers and private companies are undermining local Building Departments, mostly due to perception of the construction industry. If you are a diligent Building Department and enforce the minimum code you are perceived to be over-the-top. This mix and match the State is allowing is diluting local enforcement.
- Many permitting jurisdictions have passed ordinances that circumvent FBC. Interpretations are still happening while projects are under construction.
- Building Inspectors & Building Officials need to be removed from the employ of the Jurisdictions were the Codes are enforced. County Commissioners & City Managers interfere with the Administration of the Code due to pressures from the voting public.
- Code too confusing to interpret correctly...example: residential townhouse independent wall provision.
- An inspector may make certain items a priority and enforce an interpretation incorrectly.
- We should be given time to comment in the code when commentary sections are open.
- Building Dept. is inconsistent in review and inspection process. Building technology and design exceeds the departments understanding. Review process takes far too long and often focuses on minor points, while missing the big picture.
- Uneven enforcement. Many Building Officials and Plans examiners are not well educated to provide the authority over the professions they rule. Very few have college degrees in construction, engineering or architecture. How can they be expected to review plans without a more thorough knowledge of the fields?
- failure to accept project specifications as part of the contract documents unreasonable demands for documentation for Florida approved products.
- The individuality of the application and requirements process.
- Still some rogue Building Officials that are enforcing their own version of the code.
- The growing bureaucracy and no enforcement of the statues on the municipal jurisdiction for political encroachment into the Building Departments.
- The code officials have one view and are usually not able to see another side.
- Customer service from the locals.
- Some of the county workers have their own codes they try to enforce which takes time to correct. This

includes the Fire Department.

- The code tries to address the whole state.
- Very little follow up on remodeling or inspection of existing structures.
- There still seems to be some variation in how the code is interpreted and enforced.
- On a local level; none. --Christopher Weir, Florida Fire Chiefs Association-Fire Prevention Section
- Not enough timely information is passed from the Commission to the local government. This creates inconsistencies in code interpretation and application.
- The fact that there are still conflicts between the building and fire codes.
- Differing levels of reviews provided on a county by county basis. What is accepted in one county may not be accepted by another.
- Building officials should be required to take CE courses every time the Code changes.
- The lack of clarification that has come from the commission. If it wasn't for the efforts of BOAF discussion group trying to get uniform interpretations on clarification that make sense of the edicts that come from the commission.
- It is not interpreted consistently.
- Note sure, I suppose the perennial differences of the NFPA codes with FBC and the never ending series of conflicts that continue.
- The codes and standards have become so complex that the design build community is routinely tripped up by over zealous enforcement of minutia. A more cooperative means would be better.
- Building permits being issued without the review of the fire official and C/O issued without the sign off of the fire departments.
- Very little or no support and lack of code information and knowledge.
- There is still an attitude in some jurisdictions of how they want it and not how it is written. There also should be a mechanism in place to get interpretations of a code section without paying fees and begin specific to a certain circumstance. A State Building Official with all jurisdictions under that authority would also eliminate the local political pressures being put on local enforcement personnel. The economic conditions have created a situation where many are being told you are lucky to have a job. There are some jurisdictions that are clearly not doing legitimate enforcement of Building Codes and enforcement personnel who are profiting in this manner. The private provider law is outdated and needs review. An example would be that private provider inspection personnel are allowed to work as contractors in the same jurisdictions as they perform inspections thus they are inspecting work of competitors as well as the work of their own sub contractors.
- The concern is with the constant allowing of facilities to occupy the building and start operations PRIOR to any issuance of a Certificate of Occupancy or release from both the Building & Fire Official in accordance with the Code. Also the problem seems to be many times that the Engineers and Architects are not reviewing the Building and Fire Codes to ensure the facility is compliant. Many times plans come through and they meet only one base code. When they are sent back denied the Architect or Engineer calls and states this is compliant quoting Building Code.
- As above. The exceptions from even enforcement, whether department or individually driven. Uneven enforcement cost a contractor or builder/developer at the very least a lot of time, at the most a lot of time and money. This is patently unfair and makes all levels of enforcement look bad.
- There is too much 'rolling' on the code from pressure from contractors.
- I don't think technical amendments should be allowed.
- Communication and education to include both departments.
- Some local building officials do not actively enforce the requirements of Chapter 9 (Fire Protection) of the Florida Building Code stating that Fire Protection is the responsibility of the Fire Department, but the local Fire Officials do not enforce those requirements because they are located in the Florida Building Code, which is administered by the Building Official.



- Too much political influence, reduction of personnel, failure to educate the inspectors.
- The possible elimination of the fire service input.
- Still some areas that enforce the "Me Code" without reference to code mandatory provisions.
- Local officials are using the code to cause extra expense for design professionals and their clients.
- Interpretations and requirements vary by local jurisdiction. Codes will always be subject to interpretation, but there should be some type of consensus among all building officials who enforce the code.
- Many code officials are not proficient in administering the code, especially as relates to design requirements for wind loading. Also, many code officials impose arbitrary requirements that they don't understand and they are unwilling to allow the architect or engineer to provide documentary evidence of compliance.
- Here at St. Pete Beach, we work well together.
- Conflicts between the FBC and FFPC.
- The intent of the Florida Building Code was to provide consistency from jurisdiction to jurisdiction, that has not happened.
- Contract building departments the focus is always on quantity and not quality.
- Inability to remove unlicensed contractors doing work without permit.
- While "one code" exists within the state, the enforcement and interpretation of that code varies widely throughout the state.
- While some improvement could be made, improvements are a matter relegated the local authority and it's staffing which could stand some improvements.
- Fire depts. and fire codes.
- There are some cities and counties that adopt ordinances that are above the code.
- Every local administration does it differently. Procedures, Forms, Licensing, Permitting.
- The required manpower to monitor the changes put forward in the code through supplements and glitches. Process for formal and informal code interpretations and declaratory statements is cumbersome and time consuming. Late publishing of code changes after implementation dates have passed. NEC adoption information unavailable and out of sync with the major code body.
- Local yokels can't read.
- Fire and building don't always agree, even when it is in writing.
- The Admin has been weakened and we have less control for the public safety.
- I specialize in health care facilities. I see local jurisdiction letting facilities do things that are not consistent from one authority to another.
- Too many various interpretations.
- There is still too many "local" interpretations of the FBC that is not consistent with the general consensus or accepted practices.
- Lack of uniformity -- in enforcement , interpretation and understanding ... Confusion reigns.
- It depends on the AHJ.
- Time in obtaining info.
- Too many variables for a plans examiner. Even preliminary design meetings do not prevent revised opinions at the submission of construction drawings. Oh, and what version of the code is being used in this jurisdiction?
- Very little oversight and consistency.
- There is often too much inconsistency by local enforcement agencies in interpreting code.
- A perceived disconnect from local jurisdictional input into the process.
- Local level consistency.
- Municipalities not knowledgeable enough about it.
- Code conflicts take time to resolve.
- Too many sections of the code are written in a fashion that makes understanding or interpretation

difficult. This may not be easily addressed or fixed but needs to be taken into consideration when re-writing code.

- Personalities.
- Way too much time in review, nit picking of obscure rules in references to the main code.
- Inspectors in the Building Dept need more training on code plan review and enforcement while doing the field inspections and not rely so much on the contractors and special inspectors.
- Politics.
- Occasionally the "old school" folk still think "whatever I think is the way".
- Constant changes, yellow pages, blue pages, etc.
- We do not use them. They take too long.
- Local clarifications and issues do not appear to be published, posted or distributed. Should be a way to let everyone interested in Building Code know what clarifications are available. We need to be more open and share information. Word of mouth is limited.
- The number of required inspections has grown substantially slowing down the construction process and increasing the cost of construction.
- Political pressure from influential contractors and property owners. Local preferences to sections of the code as to what to enforce or not. When someone does not like the fact that they have to change.
- Local officials are not always as well educated as necessary on code related issues and updates.
- Too many meetings.
- With all the amendments it is tough to get your hands around the Code.
- There are some differences between the fire code and building code.
- We still have territorial disputes and there has not been a process established for joint training. This would go a long way in helping both sides better understand each other as well as to develop a better relationship better both fire and building code officials.
- Too many hands in the pot.
- Some Cities are opening up to outside or third party reviewer and inspectors. This is a conflict of interest in that the third party is brought on by the owner/architect. Turn around time on issuing binding interpretations.
- Not all Counties administer the code equally. We hear all the time, "well that's not how they do it in..."
- Varied interpretations of the code.
- Some local administrations hold personal opinions as more relevant than the code.
- Differences in the levels of enforcement through out the state, depending of the jurisdiction.
- Glitch amendments, When the code comes out and not even a month later there are 1,000 plus pages of changes it creates a problem with administration of the code. We now have a situation that when enforcing the code we have to look at what month the building is being permitted in to determine what code applies.
- A difference in opinion where common sense was not applied. It increased the cost and did not benefit the people the codes was written for. It was a "because I said so" ruling". Not good for the public and not good for the end user.
- Inspectors do not look at the code in the same light.
- Their verdict is law, no one higher to appeal to.
- The problem with local administration working well is that the uniformity promised by the advent of the Florida code is lacking.
- With the down turn in the economy local Building Official's are given responsibilities outside the scope of there duty. Local governments are cutting back and Building Officials are directed to oversee various functions that before were handled by other local government employees that are no longer there. These added responsibilities gravely interfere with the Building Officials ability to carry out her or his primary responsibilities of Florida Building Code enforcement. The job of today's Building Official has an

enormous responsibility and has little room for an extra duty that takes away from the safety of the public. This leaves almost no time for supervising and training of Inspectors and Plans Examiners.

- Contractors still run into differing interpretation of the Code. That is getting better in our area due to BOAF, FAPGMI, IAIEI participation.
- I cannot think of anything really wrong with the local administrative process in dealing with the code.
- Out of state architects, engineers, and contractors not familiar with FBC. Material suppliers selling products that may not be code compliant.
- Local administration across several adjoining cities is not as consistent due to different levels of experience, opinions and interpretations of the AHJ. And most designers do not participate in Local Meetings or Associations.
- No recommendations.
- Requirements to get a permit vary greatly from jurisdiction to jurisdiction. Same for onsite enforcement of the code, it is inconsistent, sometimes within the same jurisdiction.
- Inconsistent interpretations.
- Can not keep up with changes .
- The difficulty in getting projects out of certain Government entities has put a damper in the function, as a whole, of our industry.
- Local administration / interpretation is not always implemented on a level plane. What is good for the goose is not always deemed to be good for the gander.
- Not having a decent code to enforce.
- Education at the local levels. Inconsistent interpretations.
- Plan reviewers not making calls with respect to the codes.
- More detailed knowledge of the code is needed by local reviewers and better dissemination of the local requirements and interpretations.
- Some members of the local administrations work well with the industry while others interpret the code to their liking even after the Code Review has approved and approved the documents for permit. The "field" administrators re-interpret the Code as they see fit and sometimes direct the contractor to make changes which effect the cost of the building without providing a written interpretation and sighting Code paragraphs.
- As a licensed Architect, I think Flu's building code inspection provision under Chapter 468 seems to create a licensing jurisdiction contrary to the provisions of Chapters 471 and 481. Many states do not allow non-licensed Architects and Engineers to assume the job of Plans Review and Inspection in each respective Construction Division. Of the FL State Agencies that enforce this professional licensing requirement, only AHCA seems to differ.
- Seems to be a certain amount of competition for tax revenue and special exceptions to get variances.
- The officials are often not aware of local ordinances and how they impact the codes. These are often at odds with one another. For example, local ordinances were trying to encourage the use of canopies along one public corridor - but the code did not allow canopies to hang across the property line (sidewalk was owned by the City - the ones passing the Ordinance). These issues are often very time consuming to resolve.
- Lack of precedent for reference and uneven interpretation by local officials. Can't always get a clear answer. local officials must sometimes consult 'Tallahassee' for clarification.
- There are some adjacent counties whose building officials and staff are very rude, hard to talk with and nonresponsive. This makes it very difficult to do business in those counties.
- to complicated to enforce.
- I have heard several building officials comment that they like "grey" areas as they can not be held accountable. Many do not tend to follow statutes such as "exemptions" procedures in 553 F.S. This tends to lead to confusion for contractors and employees of a jurisdiction. If not in writing, what is the policy?

- This is a sensitive area. For a small jurisdictions, but busy, such as ours, time to review codes. Since the City needs a maintenance dept. a zoning enforcement dept. code enforcement dept., implementing the building code is not the only priority for some City management. When permit fees do not cover the total cost to operate the dept., even when at minimum staffing, additional responsibilities are given to building code staff. Most of these other responsibilities take away from the attention to building code enforcement. Perhaps additional funding from the State to keep minimum building code enforcement staff operating only within the building code arena when jurisdictions are operating below revenue should be considered. Therefore better enforcement is conducted in Cities where staff only focus on building code issues.
- Not all local changes are submitted to state.
- 4 different jurisdiction entities in our area, doing inspection that our consistent in all areas is difficult some times.
- Consistent enforcement. Separate documents for each and every municipality and different interpretations of the code between jurisdictions and even different people in the same jurisdiction.
- It was originally intended that there would be no local additions to the code and there are still some counties issuing additions to the code.
- Local officials don't know what they are looking at. Officials reviewing documents don't have qualifications or education to understand submittals or calculations. They just check submittal boxes on forms. I know a city that laid off the qualified reviewers and put the responsibility on novices that had not passed any exams.
- Bowing to the local political pressure. Specifically, our Building Official was chastised by the Commissioners for an action he took, which he had to take because of the Code on occasions and now seems reluctant be had some of the needed hard-line decisions.
- new businesses are not doing their research and try to put occupancies in building not properly constructed or equipped.
- Not enough education. More regulation on who can inspect and who can review plans.
- We really don't have a code. The wind is blowing, it is raining and there is a code question. No one in the office will answer their phone and you have never been able to collate changes into your code book which has changed over and over with the real meat (Concrete, steel, masonry) in references you may have never seen. At that point the code is what I say it is and I could very well be wrong.
- applying the state guide lines for TAXE(s),diverse funds for separate issues, implicating the new state mitigation for hurricanes that were designed by and for the insurance lobby's. the re-roofing mitigation imposed in 2007.
- Building plans examiners seem to leave the fire protection system review portion of the FBC up to the fire plans reviewers. Design professionals often do not realized the differences between codes such as the FBC and the FFPC or when to apply provision of the Florida Administrative Codes, therefore causing delays in plans review process.
- Changes every year, sometimes not collated for months after implementation. - Commentaries are not available on a timely basis. - Licensing examinations are not available on the same code that is enforced.
- Sometimes uniform application of the codes.
- More training is necessary for code compliance personnel.
- The biggest problem with local administration is lack of uniformity in interpretation and application.
- Some officials do not follow the code or create their own "codes" with out going through the proper process. Design professionals submitting plans that are not code compliant then playing politics to get their way. Local legislatures forcing code officials to deviate from the code.
- Designers can be a problem. Often in meetings with them they tell us that they were allowed something in another jurisdiction and then pressure us to approve certain designs despite specific code references that do not allow it. There is no way of proving whether this is true or not, and even if it is our

municipality cannot base code decisions on deficiencies within other jurisdictions. Also I have noticed that within specific disciplines, persons are not consistent with enforcing the code.

- Contractors in general are not knowledgeable in the requirements of the FBC.

### **3. Respondents specific recommendations to enhance the local administration of the Code.**

- More money.
- All code personnel should be properly educated and licensed architects, engineers or general contractors in Florida with a minimum of ten (10) years verifiable field experience. In other words - fully competent. There needs to be an efficient, effective appeals procedure that is inexpensive, quick and totally independent of the department whose opinion is being appealed. IE: Not administered or processed by the department whose opinion is being appealed. The operative word - Independent!
- Educate locals.
- Do not adopt codes until annotated interpreted version is available in searchable electronic format publish fully descriptive comparison between adopted code changes and previous code section.
- Get everyone on a level playing ground.
- There is no feedback on an administrative perspective and there is no concern on a public agency's part to perform better in the face of less and less quality documents coming through the process. A person is far better to under specify and under illustrate any project in order to allow questions to linger that are minimum code performed. Renovations are indeed more difficult than ever to adapt the Existing Statutes section of the code.
- Use the model code. Leave it as stable as possible. Enjoy the resulting compliance.
- Generally only new work on an existing building should be required to conform to the current Code.
- More carefully review the definitions and make them match so that code interpretations are consistent.
- Clarify special inspection requirements for building officials, plan reviewers and inspectors across the state.
- Tighten up the gray areas of the code that force interpretation differences by the users of the code.
- Learn from the other jurisdictions and adopt a customer friendly attitude.
- Speed up approval and be courteous to the permit applicants. I personally have not a problem, but the general public seems to have a problem. However I did not personally see this happen , so it is just a complaint.
- Stop making wholesale changes to the Code!
- Make it a mandatory requirement that any licensed building code administrator be versed in the working of the Florida Building Code and its Commission.
- Make sure that building reviewer limit themselves to following the code instead interpreting it. The be no interpretation required of what is written in the code.
- List all authorized third party inspection and test agencies in the code.
- Make the inspectors and plans examiners state employees, or Audit local building departments on a random basis.
- Simplify to what is really important for public safety that can be assessed efficiently.
- Use the FBC.
- Adopt the ICC codes in their entirety.
- Better, more uniform training.
- Better review of Building Officials performance and administrative policies.
- Local inspectors need to review code interpretations with state officials before enforcing these interpretations.
- Possibly an exchange of commonalities between Counties.
- Ratchet up enforcement, particularly at inspection. If a builder has to replace fenestration one time, he

will likely never make that mistake again.

- Implement recurring workshops for code officials to enhance uniformity of code application across jurisdictions. This is important for large companies and (state) agencies that have similar projects around the state.
- Provided continued funding to the BOAF informal interpretation process as a high priority.
- Oversight of local agencies that choose to abide by the rule that some agencies are permitted to self-administer.
- Mandate a continuing education process for code officials to keep current in the codes and administrative practices.
- The FBC needs to support, empower, and educate local building officials to be successful at code administration. The BO needs to be a Local Officer employed by the jurisdiction. If the jurisdiction wants to contract for inspectors or examiners that's ok, but there needs to be a Public Official in each jurisdiction. The FBC needs to educate local commissioners, county administrators, city managers, etc. as to their role in enforcing the Florida Building Code. The FBC needs to ensure the BO can do his / her job without interference. Longevity of the BO in a jurisdiction will go a long way to consistent enforcement. Every time there is a change it all starts over again. Many BO's move on rather violate their ethical standards or Florida Statute.
- One permitting jurisdiction that I am aware of practices that there is on manual to follow, the FBC. From what I understand so far, they try and address the questions and issues during permit review.
- Have Building Inspectors employed by the State so that pressure of being fired by a County Commissioner or City Manager for doing a thorough job would not influence how the Codes are enforced.
- The glitch amendments need to be put into the next upcoming code change instead of constantly putting out new amendments. This is what upsets the local administration of the code.
- Require building inspector departments to meet and agree in a county at least once a year.
- Make the department more responsive and efficient.
- Require higher education. Perhaps institute degrees at vocational schools that will better prepare plans examiners to perform their duties. Look toward the Charlotte, North Carolina building department and how it is administered. One of our local officials noted how well it was run - by architects.
- Greater access for preliminary project reviews consistency in interpretive rulings by far better cooperation and coordination with allied departments and agencies.
- State support of the specific statutes for building code administration.
- Take them out of the process.
- Put reasonable time limits on the plan review process and the inspection process. More customer service training. Sometimes people forget who we are working for.
- Make sure the workers know that they cannot make up their own codes and red tag jobs without cause.
- Make the code more minimal and let the AHJ do their job.
- A stronger focus on fire inspections would help.
- Let's get along, park the egos and power trips that do not exist and build an effective collaboration when there is a code discrepancy. There is not a code language that cannot be worked out effectively. We need to maintain that effective partnership. Never say I hate fire marshals or I hate the building official. Time to get along since this effective team relationship is a must and it is a positive step to help our customers, the taxpayers, future economic developers of the jurisdiction served, developers, architects, engineers.
- Creation of an electronic newsletter. Continue the BOAF Informal Interpretation program.
- Remove the conflicts from the codes.
- Send emails to Building officials and professionals once or twice a year with any interpretations of the Code that may be useful and share information.
- Mandate the city administration to allow participation in the process by the Building Officials and

- inspectors. The administrators, the cities and counties do not understand the importance of the code,
- Use ICC international code.
  - Have more unity with Building and Fire department reviews.
  - If local code enforcement does not want to feel like the enemy, they need to begin to work more cooperatively.
  - To not allow any permits to be issued without the review of the Fire Official. This would include demo permits as well, since the fire officials have more knowledge of what systems are in the buildings then the building officials. C/O would need the signature of the Fire Official before the building official would be able to issue a C/O.
  - Create a State Building Official much like a State Fire Marshall.
  - Building Official needs to ensure that the facilities are fully aware that no occupancy is allowed until all inspections have been completed and released by both the Building and Fire Officials. Better training and education needs to be placed on the Architects and Engineers to ensure that they have reviewed the plans for compliance with both codes. This will help alleviate many of the hold ups on projects during plan review when they have not even bothered to do their homework. The Fire Code is online just as is the Building Code so they do not have the excuse that they cannot afford the book. I am even sure if they would ask their local Fire Code Officials they would be more than willing to provide a class to better facilitate a closer and more friendly working relationship as I would. We all need to work together for the safety of the public.
  - Provide more than an appeal process. The individual enforcement officer must be held to a standard of performance and be accountable via a licensing appeal board.
  - Have some type of enforcement of the Code.
  - Prohibit technical amendments.
  - Make it easier to work together to make our jurisdiction safer for everyone.
  - Remove or coordinate the requirements of Chapter 9 of the Florida Building Code with the requirements of the Florida Fire Prevention Code and/or provide the local fire official the authority to enforce the fire protection requirements identified in the Florida Building Code.
  - Provide for stricter laws that limit any obstruction to reviews, provide for minimum manning for municipalities. Educate!!
  - Leave it alone! It's working fine.
  - Would like to see some additional training for both the building and fire service.
  - Specific language should be added to provide for approval of documents that have been signed and sealed by a registered design professional. After all, the signing and sealing professional is the person with the professional liability for his acts or omissions.
  - City – NONE. County - as needed with proof of need.
  - We are a small community and the building official and I work well together. Do not believe changes locally need to be addressed.
  - Continued joint education opportunities where building and fire code enforcement work together to understand the role of each player.
  - More accountability for city and county leaders.
  - Working together we can move forward to enhance the cooperation between Florida Fire Prevention Code and the FBC to better protect our communities.
  - Continue the bifurcated system (FBC and FFPC) to provide a fire-safe environment for the citizens to live and work in; emphasize elements of the FFPC in the contactor training requirements and permit fire code-related training for continuing education for contractors.
  - Again, matters of a local nature over which the commission would hold no authority.
  - Enhancing coordination efforts between the CBO, Code Compliance, and Fire Marshal Fire Prevention Bureau.

- Keep the line of communication open.
- Get the fire people out of the building business.
- I personally do not think cities or counties should adopt ordinances that go above the code requirements. This makes it difficult on a business.
- Create specific requirements and procedures for local governments to follow.
- Thorough code development completed prior to the cycle implementation date, with coordinated publishing dates. Include NEC adoption cycle with the major body code cycle.
- State level interpreters who have the guts to take a real position and not use or say the words "well that needs to be interpreted by the local AHJ".
- Provide better coordination between fire and building.
- Locals still have their own ideas about what is permissible due to the continuous glitch process and items in conflict with Florida Fire Prevention Code.
- Be careful of local jurisdictions minimizing the positive impact of the Florida Building Code. In hard times budgets will be cut and implementation during that period will decline until the next building failure.
- SLOWER building code cycles and more education.
- More training and education in general is needed.
- Restructure education, training and licensing. Mutual aid.
- Oversight of overzealous AHJ's.
- Clarity and understanding from beginning to end of review.
- Smoke control maintenance, inspection and implementation. Specifically the current trend to outsource this discipline has not worked smoothly with us.
- Have a better rules and appeals process.
- Strongly encourage local enforcement agencies to permit their staff to join the local chapters of BOAF where members discuss how each interprets various code sections. Some local governmental officials go so far as to discourage their staff from joining local chapters, which should be reversed. One step to encourage increased membership and participation is to grant continuing education credits for membership and attendance in local chapters.
- Meetings in areas throughout the state, enabling local officials to attend the meetings and appreciate the process of code development.
- Keep those commentaries coming.
- We have a specific code. Now let us have the same forms and policies throughout Florida.
- Training of staff members.
- Resolve known/identified code conflicts.
- Continued education.
- FBC needs a little more education of local building officials. Maybe we need to mix the educators as being the user public, the architects/engineers/landscape architects in more with the building officials.
- Adopt the ICC.
- More training and sharing of information.
- Develop inspection guidelines for building officials designed to minimize the number of trips an inspector must come to the job site.
- If complaints cannot be resolved at the building department the complaints about the enforcement of the building codes are to go to a special commission not to the council, commissioners, or administrators of the local areas.
- The more we stay with the national codes the less demand of time and effort it is on its administrators.
- An upturn in the economy would allow the revenue to afford additional Code Officials and therefore be more effective in Code Enforcement.
- Have the building and fire code agree.



- Establish joint training between both building and fire officials as well as some with the contractors as well.
- Adopt the ICC codes.
- City must stay in control and regulate the review and inspection process in order to insure code standards are not being interpreted and/or used in a manor to lower the requirements in order to benefit the owner/architects/contractors. Speed up the code interpretations process.
- Maintaining a uniform code.
- Education, and a state interpretation database.
- If a 3 year cycle is what is going to be used, then use a 3 year cycle. Utilize a process similar to ICC or NFPA where proposals are considered only when the cycle is open. If an emergency occurs (which should be rare) then implement a TIA (Tentative Interim Amendment) process where a review and approval can be expedited.
- Apply common sense also.
- Continuing education.
- I find it amazing that with our Code cycle running 3 years behind the I codes. We still have glitch amendments once the Code is published. Why can't the Code be correct when published?
- Mandate Building code enforcement personnel must concentrate on enforcement of the Florida Building Code. If a jurisdiction doesn't have enough permits for a full time Building Official they can contract with another jurisdiction or have someone part time. This is too important to allow city and county managers to take away such a vital representative for public safety.
- Would like to promulgate use of the ICC.
- Participation in local Building Official Associations by contractors and designers, as well as all municipalities within a particular county helps tremendously with consistency in code enforcement.
- Have a clearing house so that when an issue is questioned, that it does not have to go to a meeting of a board and is scheduled for "sometime in the future". Empower lower level employees to make the call and then publish it for all to follow in every jurisdiction. If a party then wants to challenge the interpretation, they can take the longer path.
- Mandate more training. 14 hours every 2 years is not sufficient. Mandate funding source for training. Mandate code development participation with funding.
- Administration must have a more direct hand in the efficiency of work being produced by staff under their supervision.
- Code needs to have more leeway on older existing buildings. Costs and complexities to comply with current codes is prohibiting any consideration for many buildings.
- Give the local authorities a good code to enforce.
- Obtain more qualified personnel to perform the plan reviews.
- The "field" administrators should be required to review the "permitted" interpretations prior to performing "field" reviews to assure both are on the same page.
- I think it is only fair that Plans Reviewers working for State and Local Agencies should be licensed as Architects and Engineers to qualify for Building Plans Review and Inspection jobs. Architects and Engineers after all, are the ones assuming the liability for their designs when they are required by state statutes to sign and seal their construction documents.
- Get the politics out of it. Have a corruption task force people can report incidents to and weed out Good Old Boys taking care of each other.
- Work to either reduce the discrepancies or encourage review officials to read the code and make a determination. Again - there is a very strong fear of litigation.
- Maintain a reference database of issues / interpretations / clarifications accessible to local officials and design professionals and builders (at minimum).
- Promote not only open dialogue, but polite and friendly customer service. You don't have to be abrupt

to enforce the code.

- Cut down on the total inputs and require more training to the field installers what happened to Journeymen?
- Work needs to be done on the importance of administrative issues. Send memo to all building officials of the importance of following statutes and putting things in writing.
- Make building code enforcement the only responsibility for building code staff. No responsibilities other than building code enforcement should be allowed to be given to licensed building code staff. If staff is at a minimum needed, extra responsibilities should not be allowed.
- Consistency in interpretations and inspections.
- Create plan review and inspection "districts" similar to the water management districts around the State. Make plans examiners and inspectors State employees. Allow the local jurisdictions to maintain the Building Official position. This would create consistency regionally and then statewide and allow for the movement of personnel to busier areas without additional staffing or training, maintaining consistency.
- Get rid of politics in Code from the various areas. Adopt IBC. Simplify system so that if you have a project in Georgia or in Florida on the coast, you just have one organization with a consistent thread of life safety. Get rid of Product Approvals, other states exist without them and their buildings don't fall down or leak any worse than Florida.
- Find a way to take local politics out of the mix.
- A quicker code compliance process.
- More accountability of inspectors and plan reviewers. Too much is overlooked.
- Stabilize the code, provide more training in the code.
- Present the code or change to enhance the design of building in pure & simple form. This is an issue because the average person of interest or walk in consumer does not comprehend information over the middle school level (and sometimes lower than that @ grade school level). This is a problem that is left for the locale area county, city or municipalities to deal with. This issue always makes a simple task become so complicated that people will do the work without applying for permit(S) because they feel degraded. The state must look at a simple way of providing information to cities to help overcome the issue of red tape to a state of compassion to help the home owner who will want to stay in their homes, who want to improve their well being and establish their residential property as a home, not a house!
- Specific education developed to bring plans examiners (building and fire) and design professionals together to address code application concerns.
- Utilize the IBC with minor Florida supplements.
- Code specific education classes throughout the state.
- The way local code administration is currently organized, is working well. This is possible because of the Commissions work in development of a standard building code and issuance of declaratory statements.
- Provide more state funded training for code compliance personnel.
- Joint meetings between enforcement departments should be mandatory. Seems that advances in the arena of interpretation research could be brought about. Perhaps a central clearing house of code research results could be developed on line so that when a question comes up, building officials don't have to start their research from scratch. They could view the research on the question or code section/issue that others have already done and piggy back on that rather than reinvent the wheel.
- EDUCATION, require and provide more education on how to enforce the code, what design professionals should be submitting and ethics for all parties so that, hopefully we can reduce the impact of local politicians.

More continuing education should be considered for code enforcers as well as designers.

- Meaningful code education for licensed contractors.

## IX. COMPLIANCE AND ENFORCEMENT OF THE CODE THROUGH EDUCATION AND TRAINING

How well is code compliance and enforcement through education and training working?

Ranking Scale	5	4	3	2	1	Average
Total	33	113	95	42	19	3.3

### 1. What is working well with code compliance and enforcement.

- Continuing education requirements are in place to inform licensees of their responsibilities.
- Education and training has helped heighten awareness and raise the level of attention of the industry to their responsibilities as the first line of code compliance. But having said that more needs to be done in this area.
- There is requirements in place for code training CEUs.
- The process seems to be working well over all.
- The code enforcement people do a pretty good job.
- Required training on the code every two years is a good idea.
- Many jobs are insured telling us what just changed and what that means.
- In my experience the training of plan reviewers and inspectors is good, appropriate to their responsibility.
- Building department staff members are generally knowledgeable regarding provisions of the code.
- They talk to one another.
- On-site continuous education is available and well attended.
- Building Officials, Licensed Architects, Engineers and Contractors rely on Continuing Education to get updated on the Codes. Continuing Education Classes initially were educational and informative(sometimes interesting and even fun.) I attended a Building Officials (BOAF) CE Class one time and found it comprehensive and educational. Being an Architect and General Contractor I try to find Courses which allow credit for both, which is difficult.
- Providing the information.
- Getting timely feedback from the third party inspection and test agencies regarding code interpretation.
- Some classes are being offered by the state on key new issues.
- Courses are pretty accurate and thorough.
- Mixed bag.
- We have regular meetings within to interpret the code and keep on the same page.
- Presentations and publications are clear and understandable.
- The requirement for continuing education is a must and is working well in most cases.
- Very active FBCA with progressive thinking educators.
- The quality of the training through BOAF is very good.
- Due to economics I do not believe that all contractors and administrators of the code are not getting the education they need to enforce the current changes to the code.
- The inspectors seem to be up to date on latest changes.
- We have 14 CEUs a year from Miami-Dade Code Compliance office. it help us to be updated of any changes in the code.
- Training courses are a great help to the industry and should continue.
- No real troubles.
- Greater access for preliminary project reviews consistency in interpretive rulings.
- There is quality education on the code available due to stakeholder involvement.

- CEUs.
- All of it.
- DCA could provide more continuing education seminars at local/regional level.
- On a local level, I have no complaints. The interaction with the building officials and building plan reviewer is invaluable in where I have a grasp of the expectations of FBC and they have a grasp of FFPC.
- I believe that those that conduct inspections are better trained and enforcement used more than it has been previously.
- I don't think most building inspectors I have work with fully enforce the building code. They are more worried about protecting their own interests than insuring the buildings are properly constructed. They overlook obvious violation because they were missed during the plan review process. I find especially true for contracted private providers whose funding is reliant on the speed of issuing permits and how quick a CO can be issued.
- The required education works very well. It mandates all hear the current regulations to achieve uniformity of enforcement.
- The CEU seminar process.
- Constant education.
- We are constantly educating the Industry and the Building owners that they must get all inspections and releases PRIOR to occupancy. Training is well received as multiple visits are conducted on the job sites to assist the projects and ensure that no problems arise that may hold up the project rather than waiting till the inspections are called in at the end.
- It works generally.
- Education is helping with the consistent enforcement.
- Not working.
- Efforts of the Florida Fire Chiefs and Fire Marshals Associations. Training opportunities provided by these organizations help to professionalize local code enforcement officials.
- I receive information from emails and the building official, works well.
- The inspectors seem very competent, diligent, and believe in what they are doing.
- Classes are being provided to assist in code interpretation and enforcement.
- Experienced work force.
- Most of all the industry is better informed and educated on code requirements with the single code.
- There is always room for improvement but it appears to be work well.
- Everybody is trying to do their job to the best of their abilities.
- We should all work for code compliance and code enforcement as the last alternative.
- Code compliance is working.
- BOAF code education classes are excellent.
- One code provides a firm basis throughout the state.
- There seems to be a more cohesive opportunity for training and education through BOAF and the commission as compared to that of training and education opportunities of the SFMO.
- Riding the code of the exemptions from wind debris and unrealistic wind speed. Eliminating the exception for partially enclosed residential occupancies. Requiring structural/opening protection hurricane mitigation. Exposure categories.
- Fines, sanctions, and punishments.
- Works OK.
- Courses provided are informative.
- There are courses available.
- There is consistence even though it may not always be applied correctly.
- The BOAF and other state associations are providing good education and training throughout the year. -  
-Bryan Holland, City of North Port / BOAF

- Mandatory Licensing and education.
- Building owners Voluntary compliance.
- Mandatory education for inspectors.
- The code is written in English.
- We are full of violations that need a code board.
- The traveling CEU seminars sponsored by BOAF around the state are good.
- Building code enforcement with public school board.
- Code interpretation process through DEC statements and non-binding opinions.
- Training and more training thanks to the BOAF.
- We must continue to hold ourselves, design professionals and contractors to a high regard. Hence, no more bullshit. Hold everyone to the laws that exist.
- We need more education.
- The BOAF is doing good job of offering low cost opportunities to obtain the required training classes for license requirements.
- A statewide uniform code make for a smoother review and inspection process.
- The information and technology is there.
- The fact that the oppressed can point to the body of the code!
- We get updated through Jon Hamrick at DOE.
- Appears that a variety and interesting CEU courses are available.
- The opportunity for training is available to all that wish to obtain it.
- The code is being more uniformly enforced than previously, which has improved compliance.
- Has worked well for the building officials.
- Most inspectors are very helpful.
- CEU classes and instructors are excellent.
- There are classes available to building inspectors.
- Building officials in Jacksonville are reasonable and fair.
- Plan reviews followed by site inspections followed by annual inspection provide numerous and constant opportunities for verifying code compliance.
- More contractors are aware of the requirements.
- The enforcement workforce is getting more educated.
- The process, implementation and enforcement procedures.
- Building Official, Broward College
- Educational seminars presented on the Florida Building Code are very informative.
- Educational seminars.
- The FFMIA continually supports training in all jurisdictions to educate the fire service representatives in the proper use of the Florida Fire Prevention code and the building side of the house.
- Good information on the web site. Could not find needed classes for certifications or just general information on requirements.
- Over the past 2 years I think great emphasis has been placed on making education available for the parties involved. This year's BOAF conference provided better education than any of the previous years I have attended.
- DCA staff is first class when it comes to support of local building departments.
- The code once adopted is usually clear on the requirements. Once customers are educated about a requirement, compliance follows.
- Code is clearly written and there are few complaints from architects, engineers, and contractors.
- The experience and knowledge of the instructors is always key to getting good training.
- Manatee County Code Enforcement has been very responsive to issues identified in this department's annual fire inspections when they have been identified to them.

- There seems to be adequate educational opportunities.
- Not much. More education is needed.
- The help we get from State staff in performing our jobs by answering questions when proposed is very good and all professional organizations also are in the mix when Government staff calls on specific item questions.
- The BOAF Website is excellent for assistance.
- When the code is followed as close as possible to all parties it is a good thing.
- BOAF doing a great job.
- Training is very available.
- There is some training available.
- Registration renewal is dependent upon studying code updates.
- It is a good idea to require practicing professionals to stay current with the code. This is especially true for those that are not interpreting the FL Code as part of their daily job.
- An effort is being made.
- Continuing education that includes both the bldg officials and the architects promote teamwork and collaboration.
- The training is working for those that can afford to attend the sessions.
- Strong Building Officials Association here in our area; ongoing education requirements for trades and inspectors.
- The CE requirement for licensing is good. Most people try to keep current of the Code and changes. Most CE providers strive to provide quality education. The reporting process to DBPR is also good.
- Only know if the area in which I live but they are not consistence in review or inspection.
- Locally, not much due to political pressure.
- Intense education of the business sector, coupled with more frequent inspections has yielded a significant drop in the number of violation, severity of violations and the number of repeated violations.
- Training.
- Requiring design professionals and code administrators to complete a certain number of continuing education hours every year ensures they are reasonably up to date on current code changes. -Allowing online courses enables individuals in small offices the flexibility of obtaining continuing education without negatively impacting their work schedule. Continuing education courses for design professionals, contractors, and those governed by the Board of Building Code Administrators and Inspectors often can do double duty.
- Enforcement of the code is working well with local building code administrators and inspectors. Education provided for continuing education is well organized, professionally presented and applicable to code work.
- Training for design professionals, contractors and code compliance personnel is the best way to achieve code compliance.
- The 14 hour minimum state requirements are good but are not enough.
- Some jurisdictions try but with limited staff and time creating a local education program is difficult. We are in a position of doing Fire Code education one customer at a time we are seeing results over time but it is slow going.
- On a personal level I often use the FFMIA to consult with others in spirit of cooperation. I also consult with our Fire Protection Engineer. I also use continuing education courses to enhance my knowledge of the code.
- Licensed building officials and inspectors are knowledgeable.

## 2. What is not working well with code compliance and enforcement.

- Code Education oversight.
- Inconsistent application across the various jurisdictions.
- In the current economic environment doing training over and above the minimums is a difficult sell. I am hopeful the recent changes in the surcharge requirements will be helpful.
- The education and training needs to be generic to cover all practitioners. However the confusion is usually in the details that don't get covered.
- There is very little education and training for people who use the code. The regulators try, but the users resist as it seems an onerous task.
- There should be more seminars on the FBC and related codes.
- The quality of the inspectors is poor and is not comprehensive for public assurance of completion.
- Again the answers are the same as above...we are wasting time and effort on the part that is new and in the process distracting time and effort from the parts that are really important.
- Some inspectors too weak and others so outwardly bold that they tell subs what changes to specifically make in the field, even going above the architect's head. Hope they have liability insurance.
- They don't always listen to one another.
- Recently, it seems a lot of CE Courses are taught by individuals whose primary interest is to get the stipend and pass out certificates. Not a lot of instruction. I am going to try to find BOAF CE Classes or enroll at the U of F TREEO Continuing Education Service in the future. It has to get better.
- Understanding that the information is law.
- Dealing with gray areas where a particular building design is not well defined in the code.
- More needs to be done when modifying codes (20029 glitch amendments) and or adding codes (existing building code). If you intend to modify add things, there should be classes set up for trades people and code officials to go over and get an understanding of them prior to implementation.
- Getting people to come to the classes.
- Some local administrations (Not referring to Tampa) have forgotten the intent of the code and regulate only to the letter; Seminars are limited in number, difficult to find and in most cases very expensive.
- No uniform enforcement.
- Not enough training opportunities. Once a year is not enough.
- Current and up to date presentations and publications are hard to find.
- Need more free webinars that offer CEUs.
- Education of local engineers and designers.
- For the most part it is a boring costly process.
- Zone 1 appears to be a stand alone area thinking they have nothing in common with the rest of the state.
- Enforcement of window provisions of the code.
- Coordination across jurisdictions/uniform code application and enforcement: what is permitted in one area may not be permitted in another.
- 16 Hours of revert every two years is not enough for BCAIB inspectors/plans examiners.
- I live too far away to benefit from any offerings.
- Personal opinions, and differences, sometimes become evident in dealing with staff at the local level.
- Building Inspectors & Building Officials need to be removed from the employ of the Jurisdictions where the Codes are enforced. County Commissioners & City Managers interfere with the Administration of the Code due to pressures from the voting public.
- The glitch amendments need to be put into the next upcoming code change instead of constantly putting out amendments. This is what upsets the balance of enforcement of the code.
- The permit holder does not supervise his job site.
- At the builder level we are not always aware of the new requirements.
- The training should be diversify.

- access code enforcement officials on a cooperative basis can be limited for all but the most high profile projects.
- Not enough check and balance on the quality of education.
- Not varying the training.
- A lot is not.
- The code compliance process should be streamlined and shorter so that the project does not get put on hold for a significant amount of time.
- Very little done. They learn from their mistakes.
- The Cross training opportunity for inspectors is too demanding. Experience checking is too subjective.
- Still a long way to go in building relationships in most communities.
- The Fire Official training program has not been expanded in the last 25+ years to keep up with the increased competency expectations. Unlike the Building side, there is no specific license for fire plans examiner or Fire Code Administrator. The basic entry level competencies for fire inspector are way below that of building inspector. Significant improvements need to be made in this area. These improvements will provide better customer service, responsible and accountable fire officials.
- Additional recertification hours are needed for building code administrators, plans examiners and inspectors. Need to implement the reciprocity agreement between BCAIB and the SFMO.
- There still remains a wide discrepancy in how the code is enforced from jurisdiction to jurisdiction.
- Still get different answers and interpretations from one Building Department to another.
- The thing that is not working is when elected officials city managers do not respect the code and try to pressure the code authority to not enforce the code. for special interests. The Building Officials bill of rights is ignored by city administrators. We need more teeth in the law and a direct line to the States Attorney.
- It is inconsistent.
- Certain ASTM standards are not being enforced even though cited by FBC for examples ASTM 926/1063 for stucco, they are not enforced by the infield inspection process.
- Virtually non-existent in any meaningful form.
- Is the cross training of codes between fire and building.
- Cost considerations.
- Enforcement seems to be the most lacking area. Many facility owners are doing construction without obtaining the required permitting. Most of the time, this is found by the Fire Official during routine compliance inspections of existing buildings. When reported many times the building department refuses to proceed with the permitting of the work or to issue a stop work order when it is reported cause the facility owner says it has been that way for years. The Fire Official is the one in the building for recurring inspections and is better equipped to state otherwise due to the Pre Fire plan of the facility and knowing the building layout year after year.
- More educational opportunities for the building officials, fire officials and their respective inspectors.
- Understaffed and overworked. Need to eliminate enterprise zones so building departments funded out of general funds.
- Many jobs are being lost as a result of cut backs and the poor economy.
- Very few knowledgeable professionals. Code is enforced by gut feeling Vs. true code.
- New inspectors without much hands-on experience.
- Many different types of training programs out there, all teaching different things.
- Sometimes common sense is not being used.
- Can't answer this for others. We do OK at SPB.
- Enforcement of unlicensed contractors and work without permit is spotty it need more legal oversight and enforcement.
- Local interpretation and emphasis provides for differences in application.



- Process for formal and informal code interpretations and declaratory statements is cumbersome and time consuming. Often the question involved is slightly different than the context of the interpretation or section. Code logic is what is often needed and lacking in the few code commentaries that are available. Commentaries should be available for the trade volumes, as well. Late publishing of code changes after implementation dates have passed make it difficult to train staff.
- I have seen local building official types who refuse to enforce the Florida building codes. The State has had to work with the contractor to repair serious code violations when the local officials should have handled the problem.
- The inability to allow for more discussion during a course presentation.
- Understanding the term authority having jurisdiction.
- Agency for Health Care Administration.
- There is still great inconsistency across the state with enforcement of the codes. Training is not consistent across the state.
- Lack of uniformity Ever changing codes.
- License limitations - inability to qualify for licenses. Code enforcement personnel overstepping and enforcing areas without the necessary license.
- Everyone is an expert and can read whatever they want. There is so much code that it can be discovered every day during construction, and opinioned to mean just about anything to suit the compliance agent.
- It has to have political support to work.
- There is not enough training sessions by other providers. In addition, the cost for these traveling CEU seminars has become difficult for some, especially those out of work. This results in reduced attendance and more sporadic training.
- Education is limited to licensees and not being transmitted to the actual code practitioners.
- Lack of training provided by the state.
- Consistency.
- Comments during construction (after permitting) are too numerous.
- Training opportunities should be shared with a broader audience.
- Not enough education.
- I believe a 14 hour education every 2 years is not sufficient - I support 40 hours annually as required to maintain a license.
- The same mandatory training requirements limits the type of training and it seems like the same classes are offered year after year after year.
- Getting the information to the public.
- Code enforcers that still have their own "agendas".
- No local support for training. Some limits due to budgets, but Building Departments should to be proactive on training. Old school Building Officials do not support ICC certification renewals, probably because they are not ICC certified. Building departments should encourage and support ICC and BOAF membership. County Building Department stopped supporting BOAF membership, individuals must pay themselves. No support for ICC membership or training. New surcharge should generate training funds if fairly distributed.
- Most contractors do not keep up with code changes after they acquire their license and rely on the inspector or building department to teach them.
- There are still many variations in enforcement and interpretation from one jurisdiction to another.
- Funding source for training building officials but none for fire service.
- Some inspectors are still acting like they hold resentment towards working contractors, they need to know we pay the bills.
- The pinched economy has reduced staffs to a minimum.

- There is not an establish joint training program for both building and fire officials.
- Too little training. BOAF does not do a thorough job of training due to lack of time spent on each subject.
- I don't see any training opportunities.
- Some disciplines in the City relying on another to enforce or take control of their responsibility. Disciplines requirements conflicting one another (Zoning vs. ???).
- Need more training in all Counties to make the code equally administered throughout the State.
- The CEU classes do not seem to be helpful. Mostly they read the changes, something I can do on my own.
- Differences in the levels of enforcement throughout the state, depending of the jurisdiction.
- There are not enough training opportunities for people considering certification.
- I feel that the requirements for inspectors and building officials need to be re evaluated. It seems that in some places, whoever can pass the test can be and inspector without the real life experiences in the trade. This creates a situation where the contractor is much more savvy than the inspectors, and good or bad practices are not detectable.
- Cross training with other agencies would be great. Having different agencies in one room with a common goal yet hearing a different side is always good for education.
- Enforcement for unlicensed and unpermitted work is increasing due to increase illegal activity. Part of the unpermitted work is a result of some confusion related to Codes and changes to codes and more specific changes to "Florida Specific" codes. Reduced budgets make it more difficult to enforce unlicensed and unpermitted work.
- Only one or two hours of code training are required every two years for licensees depending on the profession. At least half of the required hours of CEU's for license renewal should be in the code. One of those hours should be in the code development process. If most construction industry professionals were familiar with the code development process there would be more involvement.
- There are still some conflicts between the building code and the fire code.
- There is an increasing number of non-English speaking workers.
- Training classes where the instructor reads a power point presentation is not an effective learning tool. We can read slides from our office.
- I have experienced insufficient third party inspections during the very busy construction boom. I have not had problems recently.
- Not enough multi-discipline inspectors. The requirements seem unattainable. If they are, they should be looked at and made more realistic.
- Lack of support from local government.
- The inconsistency of interpretations by different Government entities.
- When the code is not followed as close as possible by all parties then something is a miss.
- Not enough architects involved in the process.
- One training class teaches different meaning than another class.
- Not enough training or time to allocate to training.
- The state has not compiled an adequate training resource for those wishing to gain certifications and or cross certifications. It has been left up to the BOAF to attempt to do this. Private sector courses are incomplete to prepare inspectors to become certified. Also the State exam have become very much impassable, look at the passing rates based on the past. I have often pointed out...after all, these professionals acquired their certifications in the past without such requirements they have now shut the door on new recruits.
- Courses are not all equal and do not necessarily benefit the registrant.
- Architects should check architects, Engineers check engineers. Contractors check contractors. Too many non-professional plans examiners in small towns and rural counties. All major projects in Florida should

be required to submit engineering calculations for structural, mechanical and electric systems as part of the code review process. I work as a licensed architect. In California and the Western US Calcs are a standard part of the building review process. I have had way too many engineering screw ups in Florida because the engineers are not doing their work. I have had several buildings with retrofits while under construction due to engineering error.

- The cost of taking approved courses is sometimes excessive. Building professionals also become familiar with the code through daily practice - and that fact ought to be recognized.
- Statewide standards of interpretation are needed for statewide codes.
- Poor communication between the officials and architects.
- Annual training and educational opportunities seem repetitive with little new info.
- The CEU'S are short in time for an actual understanding of the code.
- Too many Boards are required to educate the "industry" on the code. Attendance at numerous Board meetings takes a large amount of time and has financial impacts for the provider. This causes providers to concentrate in a specific area of the industry, such as inspectors, which means contractors do not get educated, or at least the same education creating a knowledge void and problems that are perceived by the public as an industry that does not what it is doing.
- Only know if the area in which I live but they are not consistence in review or inspection.
- What City has proper staff in this economy. All I see is a lot of drive by inspections. They do not compare installation with permit documents and let contractors install whatever they want as long as the unapproved substitution follows code.
- Insufficient local training.
- The long time frame to get a violator to a hearing fines are routinely reduced or waived.
- Not enough education and oversight to make sure that it is done correctly.
- Have more training sessions that all parties could and would participate in together to help all parties involved to work together in providing a safe process for the planning, approval, building, and inspections of new construction in Florida.
- Florida specifics are a good thing, "BUT" this does not need to rule the Code Industries, if the states are to truly be of one code then it needs to be a ICC base code, with supplements of Florida building specifics codes. 95% of the code can stand as a basic code guideline.
- The design professional seem to be the least educated on the code. When a new code is adopted, many plan reviews seem more like fishing expeditions, as the design professional used the plans examiner to create punch lists.
- Constantly changing codes make it difficult for design professionals and code administrators to apply the correct edition of the code to older buildings. Working on new buildings requires constant code checking to make sure nothing has changed. Licensing tests are based on the IBC, enforcement is based on the FBC, so training can be confusing, especially for newer employees.
- Interpretations of the code between jurisdictions.
- Not enough hours mandated for design professionals, contractors, or code compliance personnel.
- Local jurisdictions do not have enough funding to provide adequate levels of training.
- For some individuals and departments the required 14 hours of CEUs are hard to get but some other kinds or training, not necessarily for state CEUs should be mandatory.
- Not enough education for all parties available. Building officials get one type of training, fire officials another, contractors yet another, and so on for each discipline.
- I really feel that more Code training is needed for code enforcement personnel as well as Architects and Engineers.
- Contractors in general are not educated and knowledgeable when it comes to the requirements of the FBC. Required code education for contractors is ineffective.

### 3. Respondents recommendations to enhance code compliance and enforcement, including education and training.

- Allow for adequate funding to audit courses and instructors work.
- We need to dramatically raise the level of competency across the board. A component part of accomplishing that may be found in more aggressive enforcement of the disciplinary procedures that already exist against licensed persons including architects, engineers, contractors and code personnel. The code can only be as good as its actual application "on the ground". All of the other stuff is just "process" that is wasteful of time and money at all levels.
- Provide for additional training for the actual workers.
- Do not adopt codes until annotated interpreted version is available in searchable electronic format publish fully descriptive comparison between adopted code changes and previous code section.
- Make the educational sessions more interesting.
- Try new training requirements and field reviews in groups to afford recognition of code deficient areas.
- Education and training are truly effective if one can build increase knowledge of the code base as opposed to working to keep up with and ever expanding and changing code.
- Find a way to reduce the cost of the books, cd's - every 3 yrs is a bit much, when you're not a public agency.
- Enforce provisions of FS requiring building department revenue to be spent on building department functions, not diverted for other uses; raise salaries of building department employees through general revenue supplement to local funding; encourage/mandate pre-submittal conferences with building department officials for all projects over a few million dollars; develop plan review and inspection checklists for use by architect/engineer staff members, contractor's superintendents in the field, with appropriate disclaimer that checklists are developed as an aid to facilitate code compliance, but are not a substitute for the code; increase the number of Florida-specific online CEU opportunities for building department staff members.
- Not fixable when working with people. Each inspector will look at a condition differently. Allow for a system of complaints by users that will not mean that the job will never pass another inspection again because the inspector finds out someone complained about him/her. Inspectors should not have dictatorial power and know that it is either their way or don't expect to pass another inspection without changes.
- Seek uniformity of application throughout the state by the State adopting a code in a timely manner.
- Stop making wholesale changes to the Code! Give all of us a chance to catch up and become comfortable and confident with what is going on.
- Provide better information and keep the heat on those that are not enforcing the code as required.
- Address the design of buildings intended for AC and DC power control.
- Set up classes designed around the changes and offer them all over the state before you kick in the new stuff.
- Require education to match trade inspecting or reviewing. The concept of CEUs is very good just not working as intended.
- Simplified codes would be easier for small contractors and public to understand.
- Increase learning opportunities for both the officials and the professionals at a reasonable cost in multiple locations across the State.
- Use the FBC.
- More local training throughout the year with different courses instead of the same ones over and over.
- Offer on-line training.
- Building Officials should have to take seminars offered or approved by the FBC, to better acquaint them with the code and it's interpretations. This may already be happening, but I am not aware of it.
- Need more local code review courses and review of code issue changes.

- More educational training should be supplied by the state in specialized areas such as ADA.
- Sit through some yourself and if you have you know.
- Try to get buy-in from Miami-Dade.
- Require a permanent certification label (AAMA, Keystone, NAMI, or WDMA) with the DP of that exact window on every product. Require a label with thermal performance on every product (note that ICC has ruled that this does not need to be an NFRC label, just that the number was obtained via the NFRC methodology).
- Implement recurring workshops for code officials to enhance uniformity of code application across jurisdictions. This is important for large companies and (state) agencies that have similar projects around the state.
- Increase the CEUs for BCAIB inspectors/plans examiners to 8 or 16 hours per discipline.
- Provide electronic offerings (on-line) of the various educational programs.
- There is very little education or training. Most of what is out there for CEUs and education is someone regurgitating the code by reading it to us. Oddly enough most of us can read. This is most likely a result of DCA or FBC not contracting with professionals to create quality training. Just because someone can create a PowerPoint Show does not make them a trainer or educator. First, start by providing quality classes for the Building Officials; educate us in compliance and enforcement techniques, how to survive political quicksand, and how to consistently enforce the code in Florida, etc.
- One jurisdiction started having meetings to describe/discuss their overview of FBC. That was helpful.
- Have Building Inspectors employed by the State so that pressure of being fired by a County Commissioner or City Manager for doing a thorough job would not influence how the Codes are enforced.
- The glitch amendments need to be put into the next upcoming code change instead of constantly putting out amendments. This is what upsets the balance of enforcement of the code.
- You may already do this. Have the local building inspector post electronically new changes for our area.
- We should have training from all different national recognized agencies: NFPA, ASCE, etc. The training should be specifically oriented to Code Enforcement Personnel.
- Would like to see more internet access to courses.
- I truly desire a more cooperative working relationship with the building department.
- Increase CEU requirements and place training online.
- Shorten the code compliant process. Increase training with the design professionals and enforcement officials.
- Increase education of contractors- continuing education programs.
- Fire Marshals would serve well to read the FBC or understand the function of its usage. Likewise the building official should take note to the fire and life safety codes. This also applies to architects and other design professionals who seem to complain that the codes are inconsistent when all they have to do is see what is the most stringent and get with the Building and Fire code officials and hash it out!
- Revise the Fire Inspector certification program to include: 1. Improved quality and quantity of initial fire inspector certification. 2. Include a field component for initial fire inspector certification. 3. Create a mandatory Fire Plans Examiner certification. 4. Create a mandatory Fire Code Administrator certification. Move the fire inspector certification programs to a licensing program from certification program in order to provide greater accountability to the State Fire Marshal's Office by local inspectors. For Building Code Administrators, Plans Examiners and Inspectors, the 16 hours every two years needs to be expanded to 40 hours every two years with some dedicated time to code changes each new code change cycle.
- More education opportunities on regional and state levels to better the uniformity of enforcement.
- Stricter quality assurance programs in the building inspection industry. Infield evaluation of inspection agency and inspectors by a regulator agency. Remedial training for inspectors who don't properly enforce

the codes or perform properly.

- The education works well. The city elected officials should also be informed. The building departments should be an independent department in each municipality. An idea might be to have a state department so the local municipality cannot pressure the enforcement Official. This will not have the municipality threaten the official with his job if he enforces the code.
- Use ICC international code.
- Stricter enforcement.
- Better, clearer information on a regular basis. Free meaningful webinars on all sorts of FBC topics and details would be an excellent start, particularly if offered as a resource for continuing education. (on a related matter, I find the courses available for mandatory continuing education mandated for license renewal to be relatively meaningless.
- To allow Fire officials to inspect all per-laths before building officials. And have more joint training between Building and Fire on inspection process. There are a lot of inspectors out there that do not have a clue as to what they are looking for, this would include building and fire.
- More classes should be made available.
- Education and training is becoming more difficult due to staffing levels and the inability to have people gone for any extended length of time.
- Make the enforcement process equal to both parties to ensure that the Health, Safety, and Welfare of the public are maintained. This is of the best importance since most times the Fire Official has been in and out of these buildings on a regular basis and is more familiar with the facility and when work has been done without the required permitting.
- To assist the building and fire inspectors in understanding their respective rolls, provide remedial training in the opposite field: fire inspectors receive building code training and vice versa.
- Cross training.
- Educate.
- Continue providing training opportunities. Adopt NFPA codes as written.
- Develop a program whereby fire inspectors can use background, work experience, and training to obtain building inspector licenses.
- In the current economy, you should provide a simpler method to allow state certified fire inspectors to become certified as building inspectors/plans examiners, to provide additional enforcement capabilities.
- Education and certification for inspectors and participants of the system.
- Penetrations, fire alarm systems, and sprinkler systems.
- Create a Building Safety Academy like other states. This would serve as the foundation for creating and delivering consistent code education programs and certifications. Must be under the jurisdiction of a state agency and not a non-for-profit organization.
- Individual education, application and follow through.
- Allowing inspectors (local A.H.J.'s, etc.) to attend seminars and training to be more proficient with their job, and getting to know the other side of the spectrum as they get to know the contractor's side in some of those seminars.
- Training and Educations is always the best way to improve.
- Improved multi discipline training.
- Establish a "cross-discipline" training recognition program whereby fire safety and building code individuals can receive recognized continuing education to satisfy the training requirements.
- I'd like to see a meaningful and productive interrelated relationship between the commission and SFMO, similar to what has been initiated with FFMIA and BOAF. While recent legislation seems to have put that into place, it needs to be accomplished sooner rather than later.
- Develop training opportunities similar to those offered through SBCCI, BOCA, Uniform, etc for plans review, code compliance, etc. for Continuing Education Units and other training.

- Ensure all parties involved receive the same education and training.
- I think the education required by the legislation is 'uneven'. Some instructors know how to present info to the specific audience, others are very boring and not direct.
- There needs to be more educational opportunities between the building officials and fire officials.
- Establish a panel of experts for each discipline to provide quick interpretations with logic to support them. Get codes printed quickly for distribution to staff. Adopt the ICC with Commission involvement limited to Florida amendments. Require code amendment proposals to be made at the ICC level or explain why they are Florida specific.
- Remind code officials they must work for the "public" and not their own interests. Educate all governments (County Managers, City Managers, etc.) by informing them their code officials must be replaced when their code officials refuse to do their job.
- Set dates for each region of Florida that cover specific chapters, that will make it easier for professional to schedule the classes ahead of time.
- Require more CEUs per trade, maybe ten per trade. Plus the legal, Handy and ethics.
- Recognize there are multiple authorities having jurisdiction and that the impact of inconsistent application of codes can create financial problems for the health care facility. Local says it is ok to do, state says no it is not and Federal, Centers for Medicare and Medicaid, reduce or eliminate participation in the programs. No reimbursement, no operation and patients, families and the provider suffer.
- Provide continuing education credit for Fire Plan reviewers in particular to help coordinate enforcement of both codes.
- Slower building code cycles.
- More training and education is needed across the state using different formats and technology.
- Stop !!! It is not working. Use ICC Exclusively.
- Simplify the code.
- Fire concentrates on CEU's specific to our jurisdiction. However, there is need and room for cooperation among the disciplines. Mutual CEU courses could be beneficial to bridging that gap.
- We need more support.
- Pressure ICC to reduce the cost for their portion of the traveling CEU sessions to help make the sessions more affordable for those out of work. Also, offer more CEU credits for training sessions that are code-related. This might encourage code enforcement officials to seek training that is code-related. Also, encourage providers to incorporate more "official" commentary as part of their training more consistent interpretation of code.
- Requirement for practitioners to obtain code education.
- Monthly training classes around the state.
- No more excuses.
- Assure code compliance during permitting.
- Improve notice of training. Limit restrictions on attendees.
- More classes on both the Fire Prevention Code and Building Code.
- Have the different licensing agencies work closer together to develop core classes required by all and accept each other's approved courses. Fire Safety Inspector, BCAIB, CILB, ECILB, Architect's Board, Engineer's Board.
- Similar to building official education, code enforcers need specific education and often.
- Encourage training and provide financial support. Provide equal training opportunities for all employees.
- The training for the contractors should be required to cover the code that pertains to that contractor's license.
- Additional education will enhance uniformity of enforcement, but it will never totally eliminate individual interpretations.
- Establish a training funding source for fire inspector training.

- In two years elect a president to get the economy back on a paying basis where we can afford the proper level of enforcement.
- Establish a joint training process for both fire and building officials.
- Adopt ICC codes and have ICC give the training on them. They give excellent classes and when you leave the class you feel you have learned something.
- Provide training notification to all registered professionals.
- Creation of more specific code requirements for Zoning, Historical disciplines that work parallel with the FBC and other code regulations.
- Have more specific training standards.
- Keep it up.
- Increase the required CEU hours in FBC training for certified FS 468, 481 and 471 and 499 personnel.
- Create a certification process that is stepped. Initial step is base training (similar to what is being offered now) Second step field experience with options to utilize third party certification agencies to verify experience levels. Third step certification. Utilize ICC for testing including Florida Specific regulations.
- 5 years experience directly hands on should be required for each trade.
- Adopt The ICC Code.
- Do what BCBO/BOIEA is doing.
- Cross training with other agencies would be great. Having different agencies in one room with a common goal yet hearing a different side is always good for education.
- Educating the people teaching continuous education and making sure they do not read out of a book.
- More education, reasonable costs for education and convenient locations for training.
- The small increase at the local level for Florida surcharge is insignificant for most jurisdictions. An increase of the surcharge should result in a windfall for DCA and the Commission. Consider increasing the local collection fee to 20% and make it more clear that the money collected must enhance training funds. Most building fund revenue includes training dollars. The 10% surcharge collection will be used by most jurisdiction to replace those revenues already set aside for training and education, much like the Lottery money.
- Building Officials, Plans Examiners, and Inspectors should receive from their own department as well as training from professionals other than their own department. There should be more required training in Code for all construction industry professionals.
- Would like to see more CEU related to Lien Right education. Contractors do not do as required to preserve their rights. Notice to Owner, etc.
- The Commission needs to address all conflicts. The commission needs to have authority to make the changes and not have changes made legislatively.
- Education and training should have an annual requirement, even if only for half a day. Material suppliers should be included in a training program.
- Only allow those instructors with positive evaluation reports to remain. Provide criteria, classes, meeting, etc. for instructors so that the same consistent material is being taught regardless of who teaches it.
- Training that includes fire and building inspectors would increase quality of those services.
- Enforce the code the same across jurisdictions, have a quick (one to two days) forum for code challenges, better use of multi-discipline inspectors. Use the ICC as a base code.
- Mandate more training. 14 hours every 2 years is not sufficient. Mandate funding source for training. Mandate code development participation with funding.
- Completely take the local government out of it. They do not support code enforcement.
- As far as education, provide a more diverse palette of educational material i.e. MEP classes advanced structural classes etc. and demand a more consistent interpretation of the code throughout the State. We are working, to that end, in Palm Beach County.
- More and better training of the staff would be a positive enhancement. Even if a person has "all licenses"



continued training is often required. The "CEU" requirement really should be increased to offset the inadequate training and continued training.

- Require more architects on the boards that develop and oversee codes.
- Trainers need to be trained by one authority so they are all saying the same thing.
- Joint training with both fire and building code officials. Provide an insight to each specific disciplines purpose and challenges.
- Mandate training and manage time to allow it.
- Force ICC to allow testing exams to be given at will and not limited to 2 attempts every six months. State of Florida should provide a training program which directly mirrors the exam outlines.
- Make code education mandatory in all schools of Architecture and Engineering. Suggest using the Plans Examiner Test Study Guide as a textbook.
- If you, or your firm, have more than a specific number of projects go through review each year - have a free on-line assessment of their understanding of the code.
- Make all courses available to both code officials, reviewers and designers so everyone has the same insight into issues, standards and interpretations.
- Hold more continuing education courses that include the officials and architects in order to promote more open dialogue and an understanding of the challenges that both face in the bldg industry and code development/enforcement.
- More diverse training topics.
- Increase the class information times and the required CEU's require a updated curriculum each year.
- Create a single Board that providers could go to with classes and get multiple approvals. Create a "common" course submission form that could be submitted to any or all Boards for approval.
- Spot check on community using the codes.
- Simplify code for health, safety and welfare. Code use to be single volume, one inch thick.
- Provide more localized training on topics through-out the State.
- Quicker enforcement process.
- Better education and testing. Too many classes are just 'attend' and get your certificate, it doesn't matter if the person actually pays attention and learns. We deal with life safety. It should not be taken lightly or be a job for someone who is only there to earn a paycheck.
- Training, training, training.
- The State of Florida needs to help local and area County & City with Funding for training programs for permit clerks, inspectors, plan examiner, Building Official, Planners,& Zoning personal.
- Increase the time that a code section stays in effect. If a change is not vital to life safety, limit changes.
- More state funded training for design professionals, contractors and code compliance personnel.
- There needs to be wide spread training/education that brings all stakeholders together for a specific purpose.
- Education and training should be a priority. I have met with many designers who actually have copied the code and handbook explanations and completely used the information out of context for their benefit. For example, on a few occasions I have met with Architects who could not understand basics such as, common path of travel, mezzanines, and vertical openings.
- Require meaningful code education for licensed contractors, not just one or two hours every two years.

## X. PRODUCT EVALUATION AND APPROVAL

How well is the product evaluation and approval process working for State approval?

Ranking Scale	5	4	3	2	1	Average
Total	35	86	101	37	23	3.3

### 1. What is working well with the Product Approval system.

- Approval process has been greatly improved.
- There are multiple pathways to obtaining product approvals. It is based upon engineering design and scientific evidence with demonstrated performance not opinion.
- Online access is good.
- Generally runs pretty smooth.
- It gives a good sense of assurance when you use an approved product.
- Working well.
- The process seems fair to all products. No one seems to get a free pass.
- It plods along.
- Approval is faster and easier access on the web.
- Finding information on the internet has greatly improved the ability to get through the process. In the beginning it was a nightmare.
- The entire system.
- Well defined products are clear to understand regarding the design criteria and thus the design time is not a long process.
- No complaints.
- If something is approved, you know it's good.
- Basic format and criteria.
- The approved products are online.
- Flexibility to demonstrate product compliance.
- Ease of access to product information.
- The fact that there is product evaluation.
- Beyond my pay grade at the local level.
- All aspects, accessible staff.
- The changes to require written objections citing specific code sections for the objection have greatly reduced subjective objections. The comment period provides a reasonable opportunity for a manufacturer to prepare a response (either a correction or explanation).
- A more consistent application of the code to some non-standard type materials/systems.
- Online access is great.
- We select a product. The manufacturer knows Florida Code and has the number. We send the number to the inspector.
- Maybe if perception but I think that Miami-Dade Code Compliance do a better review.
- Having a State certified products approval process gives architects an excellent source for product specification and is a time savers.
- A lot of information is easy to obtain.
- If everything is on the level, then I believe this is working well. We have heard rumors (and that's all I have as evidence, so I don't rely heavily on it) that some manufacturers are "buying" their approval. If this is accurate, then we have major issues.
- Centralized, state wide and on-line.

- We are getting more products approved.
- Information available.
- Newer technologies are receiving approval quickly.
- Ed Carson.
- Good feedback for proposed legislation and code changes.
- All of it.
- I've not been involved with the Evaluation and Approval process.
- Good information and approval brand stamps from UL, FM, NIOSH, and NFPA detailing parameters of such approvals.
- Newer products seem to be having less trouble getting into buildings.
- Product approvals work well and give the official the information allow the use of products in his jurisdiction.
- It eliminates competition.
- Not quite sure, but it seems to be working.
- It does exist.
- Everything.
- Access and the ability to use the web site have greatly been improved.
- Product Approval seems to have been an excellent added component to the code to facilitate better accounting for safer products and structures.
- So far so good.
- Ease of contact with Berman & Associates.
- The fact that we have one as a resource.
- Works well.
- Seems to work well.
- The website is providing easily accessible information on Florida Approvals.
- Amount of data available.
- They meet regularly.
- Communication is available to work things out. Things are getting better overall.
- Information is easy to obtain online. Documents and forms are easy to read and understand.
- Very Little -- NOA -- Product Approval -- Nobody is on the same page -- moving target -- NOA Is Local Approval --not State, yet it is accepted solely in parts of the State.
- The website works well but is cumbersome at times.
- Most industries have caught up with the need to have products tested and approved.
- The online data base with PDF-type documents is good.
- Technical outsource of the approval process has facilitated the complicated process.
- Good.
- No problems observed.
- Safer , reliable building components.
- Not really knowledgeable other than as a user. An excellent concept.
- The product approval system helps the local authority to determine what will meet the wind demands and what is safe for the public.
- Information about approved products is readily available online.
- More streamlined.
- Product Approval systems have greatly simplified the review process for plans review and given the customer piece of mind when it comes to hazard protection.
- State wide code,
- Product approvals appear to be available.
- Gives us a basis of what is approved.

- We know what products are approved for wind ratings.
- New product approvals.
- Web site is often slow.
- The availability and access of information online.
- All products are listed. --actor
- Special interests.
- Makes inspections easy, all guess work is removed.
- When a product finally receives approval you can be sure it's more than likely code compliant.
- The system for product approval is easy and straight forward.
- BCIS and Miami Dade web sites are easy to navigate and provide very good product information, details, and instructions. Seems to stay updated well also.
- The system itself is good and easy to verify a product on-line. The problem is many contractors are not familiar with how to use or install their product (mainly re-roofs) per the Approval.
- It is easy to verify product approval.
- Not needed.
- OK.
- Items can be searched easily whether Metro-Dade or State of Florida.
- Not easy to follow. The Dade County Product approval is much more user friendly to operate.
- It works well.
- The products are there and can be found.
- Requiring that the contractors have on site the Product Approval documentation.
- Approvals are on line.
- It is advertised well.
- Establishes the requirement for standards of product performance.
- The system is easily accessible.
- Having PA has been a help and provides some base and installation information to review prior to site inspections.
- Testing of exterior components.
- It has made everyone aware of the system.
- Do not know so gave the average marking.
- It has made it easier to select products that meet the requirements.
- Not much.
- Getting more information.
- That more companies are getting the testing done prior to submitting the products to the commission.
- Products, manufacturers, and testing laboratories can be verified on the state website.
- Product approval creates better quality and stronger buildings with the ability to withstand Florida weather. Approvals of exterior products eliminate poor quality materials from being incorporated into a project.
- Standardizing the approval of products with information available online has been helpful to local jurisdictions.
- When an item is state approved and the contractor installs the product per the state approval it works very well, both for the contractor and the building department.

## **2. What is not working well with the Product Approval system.**

- Timely action for revocation.
- In south Florida there too great a reliance upon the Metro-Dade product approval as the gold standard. Some departments want only an Miami-Dade NOA when that is not what is required by law. But it is

within their comfort level. This gets into the competency issue raised elsewhere.

- Provide for a speedy process.
- Little glitches with ownership issues.
- Not easily searchable for products and current testing.
- There should be a state run web portal to access and research all Florida certified products.
- This system seems very cumbersome.
- It is very difficult to get the approvals.
- Its all determined by Miami-Dade.
- Manufacturers that have applied but not received their approval status should not be allowed to participate with the process.
- Many products are submitted only for coastal approval, leaving the interior either forced to over-specify, or seek local evaluation. The paper work of the system is burdensome to all, so much so that it just gets shuffled out of the way at the jobsite. Do you really expect each inspector to look at this stuff for the complete variety of materials he inspects daily?
- Have found it difficult to bring up an approval for reference on a project compared to Miami-Dade.
- It takes way too long. Everyone knows that.
- Too long to get products approved.
- It plods along.
- Owners seem to find it too complex or confusing, so they try to skirt compliance altogether. They will often try to hire unlicensed Contractors or try to get work done without a permit.
- There's needs to be some leeway when working with special products that do not have the quantity of use to justify being tested - there needs to be some allowability of a qualified engineer to pass professional judgment.
- When a design such as an AC and DC power control is not well defined. The design and delivery process is increased tremendously.
- Can get bogged down.
- Web-based search engine is awful and too limited. It is difficult and time consuming to find assemblies that meet both the engineering requirements and aesthetic desires.
- Too many complaints from the contractors.
- Applications review process, unclear conditions, no visibility of status Commission meetings deadlines are hard to follow, and leave too much subjectivity to the reviewing agency.
- The review and approval process is too weak. Allows fraudulent submittals to be approved.
- Navigation of the Product Approval website. Hard to find general product information from general search.
- It has now become a paper drill at the local level.
- Miami-Dade.
- Doesn't add value to a certified product that is required by the code to be labeled and certified. BCIS seems to trip over itself whenever codes or standards are updated; its very expensive and wastes a lot of time and money. Inconsistency in approval of applications: revised applications sometimes get flagged for unchanged sections, exact applications are sometimes accepted and sometimes rejected.
- Finding materials that have been approved. Seems like I have to know the approval number to see if the material proposed is approved.
- The commission is performing a task that could be conducted by third parties. Mandate product approval by a NRTL and be done with it.
- Too much dependence on the approval process by the local agencies. "If it's not on the list, forget it!" They still can do their own evaluation based on Chapter One (104.11).
- There is inconsistency in what is accepted documentation for the products. As an example, some metal roofing manufacturers will provide a page or two of engineering and details while others will provide

complete installation manuals. When we question DCA about this we are advised to require local approval of any additions or changes from the DCA approval.

- Once again, Special interest groups how have no idea what they are talking about are influencing the code development process.
- The database is too sluggish to be useful. I think code officials who try to use it as intended find it unsuitably slow.
- For those making product submittals, the database response time and redundancy results in tremendous waste of time in that something which should take 5 minutes ends up taking 8 hrs or more for submittals with multiple products. Attachments should never have to be uploaded more than once.
- The expiration of an applicant's product application fee due to a 6 month interval (or for that matter, any interval) is inappropriate (unless there are services related to that...I don't think there are). Penalizing applicants essentially due to early payment of fees is unnecessary, inappropriate and unfair.
- The Florida Product Approval system has flaws in it that result in excessive bureaucratic burden for every product, with most such products not requiring the burden associated with a formal statewide approval. This in turn requires excessive time or attention from many participants in the process, and the end result has conditioned most participants to minimize their role resulting in the system not providing sufficient scrutiny when it is necessary. For example, for evaluation reports issued by approved entities, the only further value added by the Florida Product Approval system is verification of a quality system consisting of an annual audit by an approved quality entity. This further value is questionable at best as the Florida system has no requirements on the quality system beyond this requirement for an audit, so there are no standards for the audit. It should be suitable to rely upon a quality system that is monitored by the approved evaluation entity, which both simplifies the Florida process (essentially doing away with it for such products) as well as raising the standards for the quality audit given that approved evaluation entities such as ICC ES and IAPMO ES have higher standards than required by the Florida system. It is reasonable to retain the current system except with the addition of some standard for the quality system beyond an audit (such as the quality system must satisfy relevant portions of the ISO 900x series) for products that are not recognized by an approved evaluation entity.
- When an error is made by a participant, there is no way to identify and correct that error beyond the scope of what the Product Administrator has been authorized, which is very limited.
- Hurricane shutters constructed by homeowners.
- All on-line information.
- When approved products make changes that would nullify their approved status, these products could continue to be sold as approved.
- Poorly referenced and searchable.
- Slow and cumbersome.
- The inability of Contractors to locate this information and the lack of Building departments to verify the updates.
- Takes too long between code cycles to approve products.
- Sometimes difficult to determine which products/systems are approved.
- Some product approvals are in a gray area and requires significant delays in assuring these approvals are agreeable to both building and fire officials.
- Some approved products are not really standing up in the field and not performing as expected. But it appears difficult to get them removed from approval.
- It costs us close to \$5000 to research and print product approval sheets for each project. When you look up windows for instance, you have to read through 10 pages of testing info to get the correct window for each use. For roofing, the building departments want 40 or more pages of installation instructions printed for each type of roofing used-this is a big waste of time and money for the project owners. Certification with a number should be all that is required.

- Some of the information sometimes requires some digging to full clarification of details of the application.
- It is expensive.
- CDA listing site is virtually unsearchable for a solution without already having specific knowledge of a manufacturer and product. Products and materials should be best organized or readily cross-referenced to the CSI specification organization format. National manufacturers are not entirely up to speed with Florida registration requirements.
- I have seen many projects get held up due to the contractor having to wait for the product company to supply the required information.
- Sometimes it is difficult to find revisions to product approvals on the website.
- Announcing its location.
- Too restrictive. There are many products and assemblies that do not have Product Approval numbers or NOAs (mostly from out of state). It is either too expensive or the market is too small to justify testing and approval.
- Product approvals are doing well. --.
- I have not seen any glitches.
- Using another code agency approval for certification, and that document having an expiration date that may be prior to the Florida expiration date for the product. Having to look at both Florida and Miami Dade websites to find product approvals.
- Everything.
- It's difficult to compare products.
- Speed of website.
- They meet regularly.
- The online system doesn't always match up with what is required and not required. Validation checklist items sometimes apply while others don't.
- There is some confusion on what products can or cannot be evaluated and what minor alterations to the product approvals means for an installation.
- Again -- no uniformity -- different test criteria, different levels of acceptance.
- Not enough Florida Product Approvals to mandate. It seems to be a profit center that drives up cost of construction.
- More paperwork, same products usually for each contractor.
- The process is too cumbersome and difficult. Plan reviewers and contractors spend more time on verifying product approval numbers than they do verifying structural components of the plans.
- No room for common sense or combinations of systems that aren't listed.
- Some product approvals are not updated as frequently as they should be and some refer to compliance standards that are either outdated or not the adopted editions in FBC-B Chapter 35, but are often found to be re-approved without engineering certification that specifically refers to the new codes and standards.
- Timing of notifications of approvals and revocations.
- Good.
- No installation information available on a lot of products. O.k. they are approved as tested. How are they tested.
- Hard to find information.
- Heavy emphasis on paperwork. No emphasis on site specific detailing. A lot of the testing is a joke when it comes to a field fit.
- Some perception by product folk that it is too bureaucratic.
- Some design pressures are buried in documents, should be readily found.
- The online system can sometimes be difficult to navigate when not all the information is available about

the product.

- In some cases manufacturer's are not updating their approvals and are trying to rely on outdated listings.
- Information missing or conflicts in information.
- Special interest influence.
- There are still a lot of good products unrated.
- Different areas have different requirements. Some only require a description others require you to print out all info and turn in with the permit when it is available to the inspectors online therefore wasting time and resources.
- Having the building and fire code agree.
- The State not keeping up to date on the approvals.
- Should use same system as IBC.
- New products that are approved lack innovation.
- Installation instructions are hard to find. It is difficult to navigate the online system. Really do not see that this requirement is beneficial.
- Periodic evaluations of the tested products at the manufacturing sites.
- You still have to check the state website and then Miami-Dade website for products.
- What are the effective dates or approved cut off dates on these products? Need more information on the web site for looking up products that have failed and corrective action. How quickly can a product be approved?
- Out of date product approvals. Some product approvals extremely difficult to read, slanted more for engineers than inspectors.
- This is a monumental burden to local departments and builders/homeowners. Truly one of the larger unfunded mandates thrust upon local officials. The volume of paper generated, reviewed, scanned and stored is beyond acceptable.
- Faster access for general public for approved products and specifications.
- South Florida's influence on the product approval system. It seems that some in South Florida love to regulate and love as much regulation as possible. If South Florida doesn't want a certain product used there, that's fine. Florida Building Code Product Approval System doesn't need to be like South Florida's.
- It does monopolize opportunity to the large manufacturers.
- The system appears to be very cumbersome.
- Creates a lot more paper and many contractors do not understand or follow the installation requirements. Contractors provide paperwork just to get through plan review process but don't understand the many different options shown.
- Products are approved and then later testing methods change and it is not readily obvious on the approval website. Interim local extensions have been required to use a product while the new testing protocol is established.
- Not needed. National product approval systems should be sufficient.
- Often hard to find need info on line.
- Request for information on a particular product is hard to get as the personnel involved in the process are hard to reach.
- On Roofing. The product approval seems to be approved, but it is not. I sent an email to Mo, but never got a response. Communication is everything.
- Florida product approval documentation should cross reference Miami-Dade NOA's.
- Not all manufactures realize that installing differently (materials, fasteners) cannot be changed at their whim.
- The Contractors do not seem to understand the need for them to have the documentation on site even when the Code Official requests a copy . . . if they do make the request. The professional consultant reviews the documentation during the design and document production phase, yet it seems that when the



- Contractor requests a "substitution" they expect no delays.
- Testing costs way too much money. Product approvals need to have a longer time period for registration. Have wanted to use a number of products which were tested...that the NOA expired and the company couldn't pay the re certification fee.
  - Fairly cumbersome. Not many people have time to read the proposed changes in order to comment.
  - Product approval process and testing criteria! Must be the same standard statewide for all zones so that all products can be evaluated equally not just one for the HVHZ zone and all others. Also, cost of testing leads to Florida being isolated from manufacturers who can't afford the ongoing cost for such a limited market (i.e.: the HVHZ zones are a limited market).
  - In some cases, you cannot provide the specific Simpson Anchor number until the shop drawings are prepared for element so that the anchors can be sized correctly. Some counties make you pull all of these numbers prior to receiving a bldg permit. This is counterproductive due to not having the pertinent information until the elements are about to be fabricated.
  - Installation instructions are not always provided and sometimes the information just notes Miami-Dade approval and then one has to go to their site.
  - The updating of information on the website and removal of information not current.
  - Inspectors and contractors in our area have no understanding of product approval or what it is about.
  - It is not needed and creates additional bureaucracy that must be navigated. The existing programs, including ICC-ES system and Miami-Dade approval systems are all that are needed. Most products having an FL number have already been tested by ICC, Miami-Dade or another recognized testing agency. The system is misunderstood and designers have been asked for FL approval on products never intended to be included. Designers and reviewers need to be educated on how to read the reports and apply them. Many times products are accepted because they have a number, not because they are appropriate for the installation.
  - The whole system should be abandoned.
  - Too much money being wasted. Other states have safe buildings without this system. The Home Depots and Lowes are full of products sold that don't comply especially windows and claddings.
  - Getting too much unnecessary information.
  - Takes too long for a company to get access to a testing laboratory.
  - Local product approval is not restricted enough. Substitution of non-approved products by manufacturers with approved products is too difficult to determine without extensive research.
  - Product approval has been slow and cumbersome; however, the system has been working better in recent years.
  - Florida Product Approvals are still not accepted in some South Florida jurisdictions without any consequence.
  - There seem to be a lot of differences in what various enforcement departments are requiring from contractors. Research of product approvals is not too user friendly but this is due in part to inconsistent requirements for documentation among enforcement departments.
  - Too much local product approval.

### **3. Respondents specific recommendations to enhance the Product Approval system.**

- Facilitate enforcement of system by streamlining agency processes.
- Allow it to work as intended.
- HB663 made some headway in this area.
- Simplify the process of getting approval so that it is not as difficult and/or expensive to get the product tested. Also, put some trust in the design professionals on selection of products.
- Kill the slow moving website of the state and institute a user friendly and new website for public access.

- Rely on people having time to develop and use common and professional sense. Now if the numbers match up there is almost the presumption that the installation is in compliance...a dangerous assumption. If we as an industry do not understand the basis of the principles of sound construction we will never be able to design by them or build by them.
- Fire the people in charge at the State and Miami-Dade that hold up the approvals.
- Simplify categories of approvals.
- Give all of us a chance to catch up and become comfortable and confident in what is going on.
- Work of better defining buildings designed as AC and DC power control rooms.
- Liaisons to coach smaller companies with good ideas through the process.
- Improve the Web-based assembly search engine.
- Make it more timely for approvals.
- "Soften" submittal deadlines, allow to modify applications until review is complete; utilize more consistency and objectivity in review process; give applicants more visibility during review (rejections communicated at the last moment, sometimes without explanations); implement "expedite" option; eliminate redundant validation process.
- I discussed this earlier. We need independent, FBC approved, staff reviewers that can provide technical review of submittals. Problem is that the cost will skyrocket and that seems to be a major concern.
- Make finding product types easier.
- Make it apply to only to high wind areas.
- Buy-in from zone 1.
- Allow approved certification programs with certain credentials (i.e. ANSI) to be acceptable in lieu of the BCIS. Perform a random audit of one certified product per manufacturer and the manufacturer would pay for that application review. Consider all newer versions of a code or standard to be acceptable, but give any entity the right to present reason why any update of a standard or code should not be deemed equivalent (sort of the opposite of the way its done now). Provide a way to distinguish new information in a revised application and only critique the new information.
- The commission is performing a task that could be conducted by third parties. Mandate product approval by a NRTL and be done with it.
- Require product approval labels on products or packaging at job site.
- Require changes or additions to DCA approvals to go through DCA and make local jurisdictions clean up poor submittals.
- Educate contractors and designers about product approval system.
- Establish a statewide requirement on how product approval documentation should be submitted to Building Departments, standard form and minimum documents required.
- Remove the requirement for a local product approval to rely upon the form and formatted requirements of the statewide system (the form). Allow local officials to rely solely upon evaluation reports or certifications from approved entities such as ICC ES, IAPMO ES, UL, etc... when the scope of the evaluation is suitable to justify the product application, and permit this on a project-by-project basis, even if those products do not have formal Florida product approval recognition either local or statewide. A formal Florida approval (either local or statewide) should only be necessary for products based on technologies that are too new for recognition through the formal evaluation systems that already exist elsewhere or where that method is preferred by the product manufacturer (like cost savings etc...). There is no reason why Florida requires a unique approval different from everywhere else in the US when the same model code exists everywhere else, in general, so work with ICC ES, IAPMO ES, etc...to avoid cost & redundancy.
- Improve the database by streamlining its content, avoiding redundantly requiring multiple submittals of the same evaluation report as both installation instruction and evaluation report and for multiple products.

- Permit engineering judgment to replace testing when appropriate. Testing is costly and rational extension of test results should be permitted in engineering evaluations even when the code cites a test standard as long as the code does not expressly prohibit such extension (as opposed to the current rule which prohibits such extension in all cases it is not specifically permitted by the code).
- Somehow enable easier reporting and evaluation of errors or misdeeds from participants. Too many gaps exist in the process now that prevent anyone from having overall responsibility. Either enable this for the Product Administrator or internalize this to state staff to permit independent review by state staff of reporting of errors on any product approval (including after approval by the Commission). Much of the errors I think are identified by participants who are subject to review by the Product Administrator in some way so the system as it currently exists prevents complaints from being acted upon as participants are unlikely to complain to the Administrator if they perceive potential issues arising for themselves or their industry. Similarly, anonymous complaints should be taken for review as some of the information regarding product deficiencies are not likely to be reported any other way.
- Approved designs for hurricane shutters on single family homes that can be made of plywood by the home owner or local builder.
- The review process.
- Maybe the FBC should consider that the approval have a specific time limit before a re-certification is necessary (unless we have this requirements already in the process). This re-certification could guarantee that the product still meets with the initial approval, or that it meets any updated requirements for such product.
- Online search tools need to be vastly improved. I cannot begin to describe the waste of man hours devoted to find or "shop" for a suitable product approval document. At best the current system works only if you "know" specifically what product and manufacturer you are looking for. Often we are looking for a solution without a road map.
- Streamline documentation in drawing submittal.
- User-friendly web-site for the Commission.
- Get rid of the product approval process and allow the products to be used that are tested and listed for their use.
- Be specific and agreeable on what approvals brands will satisfy the particular approvals. I trust the building official in my city for approvals I may not be too keen on. I can say again that maintaining a conduit of communication and relationship will assist the aforementioned statement.
- Develop a process that makes it easier to remove or limit the use of products that are inferior in performance.
- Simplify the whole process to a simple chart format and eliminate printing all the back-up and testing info. Require the builders to have one copy on the jobsite for each number listed and that is all. That way the manufacturers can print the sheets for the actual product sold and delivered.
- Just keep reviewing the documents and addressing the inquiries when information is not clear.
- Use national standards.
- KILL the Miami-Dade product approval. It just complicates matters for the manufacturer. If you are going to have a state system - make it uniform.
- Let the third parties like UL make product approvals. We (State and Local) should not be in the business of approving products.
- Create a more visible link.
- There should be some methodology that would allow the design professional to approve products with "similar" characteristics to those that have approvals.
- More information disseminated to all officials. Lack of information may be an internal problem.
- Licensing applicators of spratty type products.
- I have no recommendations.

- Provide more training on how the program work.
- Updated lists of products should be placed on the Commission web site. Provide a better and more user friendly way of accessing the approved products.
- Require Miami Dade certifications to be Florida Product Approved unless submitted for local product approval.
- No recommendations. It seems all codes always refer back to the "manufacturer's recommendations" anyway.
- Organize website so data is sorted and accessed in smaller amounts to make it faster and easier to find information.
- Continue to look for ways to catalog what has been approved, so that users can find information quickly.
- More consistency with how the rules are applied.
- More education and training on the program is needed.
- Throw it all away and accept ICC - ES Only. We are NOT unique.
- Give all Miami Dade approvals a Fla. Product Approval.
- There seems to be a lack of understanding on the part of the retailer and the contractor. Perhaps more education on their part on the system would be helpful.
- Allow engineers and architects to certify assemblies.
- Not part of my daily functional authority.
- More audits should be conducted on product approvals to assure the product still complies with all currently adopted standards and criteria.
- I am surprised it works this good.
- Make the database/ computer check program more user friendly.
- Make information more readily accessible on approvals.
- Make allowance in the test protocols for missing screws, loose screws or a free edge, make the test more field compatible.
- Make sure that product approvals get a review that the information is needed! In other words don't make the information 10 pages when five pages will suffice.
- Continue improving data base.
- Have it made more user friendly.
- May need to add a digit (or digits) indicating the expiration date to the product approval number.
- Have any products that have consistently failed UL or other nationally recognized tests been approved by Florida? This appears more as a funding source instead of product control. Stick with UL listing.
- Always make the availability for testing as easy as it can be. Politics has no place in product approval.
- That products and approval numbers should be required but a hard copy only be supplied at a request of the inspector.
- Having the building and fire code agree.
- Approve the products in a timely manner.
- Consider using ICC-ER system to evaluate systems for wind load rating.
- Need to be more open minded to new and innovative technologies and work with these companies to ensure they meet the intent of the code.
- Recommend the abolishment of this requirement.
- Review procedures on periodic testing and provide third party verification of the required audits.
- Combine elements of both into one site.
- Any product used that requires product approval should have a stamp or seal indicating approval. This can be field verified at time of inspection reducing the volumes of paper produced to tell us for instance a window meets the requirements.
- A web site just for the product approval numbers along with products. Search mechanisms could use improvement.

- Give Building Officials more alternatives to approve a product locally. The biggest hang-up is the requirement of quality assurance. Let the Building Official accept an alternative to that requirement such as testing of that particular item to be installed even though it's mass produced. Test the particular item each time for the particular installation per location and situation.
- Increase focus on protection of the structure.
- Require the designer of record to provide specific product installation instruction on the plans. This will only work though when a designer is involved. Permits for window replacement and re-roofs are left to the individual contractor to figure out.
- Too far gone to change. But if you could, revert to national approvals.
- Have more personnel available to answer questions when called.
- Rework the system to make it user friendly as what Dade County is.
- Florida product approval documentation should cross reference Miami-Dade NOA'S.
- More different training for manufacturers, designers and code officials.
- Regular reminders of the process to registrants so we can answer supplier questions.
- You need to make sure the testing assemblies are complete. I have had window systems which were approved and no one had any information on attachment methods.
- Not sure of a good way to get public involvement without getting unwieldy. Review officials may be a good test of proposed changes. Many of them are aware of what the conflicts are and good be a resource.
- Equalize the product approval process and criteria. If there must be a difference between HVHZ and all other areas then make the criteria for both clear and equal so there is a statewide baseline standard of performance for each zone (HVHZ and non-HVHZ).
- Allow the Approval numbers to be submitted with the shop drawings prior to fabrication as a condition of the permit.
- Complete info should be on the FPA site.
- Monitor the website and remove a product if outdated and not renewed.
- Target the building officials (CBO's) for education on the issue.
- Eliminate it, return to the nationally recognized and accepted testing systems.
- To get rid of it and utilize IBC standards.
- The cost of having a product tested keeps smaller manufacturers or specific products from being tested and approved.
- Get rid of it. Local officials just look to see you submitted a number on your drawings. They do not have a clue if the system works in a substantial building, nor care.
- Cut the boiler plate & repetition and have a summary sheet for the inspector in the field giving only the information needed to make the inspection.
- Allow more laboratories to be able to test different products.
- All product approval document titles should include the manufacturer name and model number.
- Require state product approval for all of the items covered under FI Product Approval.

## XI. BUILDING CODE INFORMATION SYSTEM (BCIS)

### How well is the BCIS functioning?

Ranking Scale	5	4	3	2	1	Average
Total	33	78	107	22	18	3.3

#### 1. What is working well with the BCIS.

- Excellent.
- Access.
- Information is getting out complete and timely.
- They are improving and use is expanding.
- Working better and better with age.
- Lots of information provided.
- All the information is there.
- Moving toward a uniform BCIS.
- Notifications and search.
- Most everything.
- Accessible and easily read.
- The BCIS, in general, is a good site for the main features of the FBC, the code, manufactured building, interpretations, etc.
- Notifications of events via e-mail.
- Great tool.
- Have not had any problems so far getting what I need.
- Improvements to BCIS have been very beneficial.
- The entire process.
- Works well.
- All of it.
- This system is wonderful. No complaints with the recent improvements.
- The fact that there is an established system is definitely a benefit.
- Has improved over previous years.
- It is working fairly well.
- Most of it.
- It works.
- Communication.
- Amount of information available and ease of use.
- I receive information as needed from the PCCLB.
- Ability to access the data.
- I have no experience with this system.
- Working well.
- Fairly well organized.
- It exists.
- Very well.
- The interactive website is fantastic. Ease of obtaining information and guidance has been getting better each code cycle.
- Better communication with DBPR.
- Universal access to Florida specific requirements.
- Easy to navigate.

- Information is being provide by one source.
- A very good start.
- This system is very useful to find information about the code and the products.
- The product approval information is readily available although the format is a little cumbersome.
- Seems to be ok.
- Allows important information on requirements and process.
- The online updates to the FBC and general availability of the FBC online. In addition the DCA clarifications that are accessible. The FBC system, in general, functions well with respect to permitting, plan reviews, enforcement etc.
- Great information.
- Easy to access.
- The informal interpretations are a great tool.
- Provides information on all items which are going on in the system.
- The information on the site is not useful to South Florida.
- This is an easy to use system once you learn it.
- It is a money maker for the state.
- Not familiar with this program.....guess it's not working so well.
- Having all of the info in one place.
- The site is performing well. DCA staff has done an excellent job of improving and maintaining the site. This is one of the best things has come out of the "Uniform" Florida Building Code.
- Amount of information available.
- Private citizens and out of state design professionals can access the FBC online.
- BCIS is functioning well with needed links to building code on line. It creates a one-stop solution for construction code information.
- Organization of information is helpful.

## **2. What is not working well with the BCIS.**

- The system does not always seem to be current.
- What is the BCIS - there has been no information published about such a system.
- Not all jurisdictions have.
- I don't have that much experience with this process yet.
- Mostly seems to tell of meetings but not any detailed info on changing or hot issues.
- Difficult to browse.
- Finding the information you are looking for.
- Education.
- No information to the code officials.
- Web-site is down too often.
- Guess if I don't know about this there is something wrong with it or me.
- Busy web site, sometimes difficult to navigate.
- Laborious task to update data. To locate a given product from its name and description (not knowing the FL number up front) is pretty much impossible.
- Other features of the BCIS are not kept current.
- Pages under construction, out dated brochures, lack of current and relevant hot topics.
- There are still to many links to the original BCIS. "Hot Topics" are used to often the links to those subjects should be made to the system menus.
- The actual teaching of the courses and the lack of follow up to insure what was approved is really being taught.

- There needs to be more advertising as to how the system works and access to it.
- Better notifications on effective dates and revisions to code.
- The BCIS has to be monitored and tweaked as necessary.
- It is extremely difficult to find information on the website. It is not user friendly.
- Waiting too long to implement life safety requirements.
- Infrequently updated.
- It exists.
- Cost of getting the information.
- There are not enough professionals utilizing the service and keeping up-to-date with changes and program functions.
- There is obviously a cutback in staffing.
- Timely updates.
- They have no presence.
- Sometimes not able to reach online.
- Information is sometimes difficult to find on the web site.
- Needs better search capabilities.
- The system can be confusing and hard to find by some people.
- The interpretations/declaratory statements information is very difficult to access in a useful way.
- No notification to the code officials.
- User friendly and access.
- Web site sometimes slow.
- Needs a facelift. Functionality is outdated.
- It is a bureaucratic evaluation that takes a lot of time to implement and the cost to consumers could be allocated to better educate the general public.
- Gets slow at times.
- The time it takes to get an answer for informal interpretations.
- Too complicated.
- Does not keep site updated.
- Not everyone is familiar with this.
- Your website is a joke. Can't get information off it. Emails on interpretation are slow being returned.
- No idea what the BCIS is.
- Navigability of web site.
- Me having no idea tells you it is not working.
- Some out of date information is not removed from the site in a timely manner. Sometimes searches for product approval or interpretations do not give a result when one does in fact exist. Inability to see floor plans for product approval in regard to School Board built modular classrooms.
- The Florida Fire Prevention Code should be added.

### **3. Respondents specific recommendations to enhance the BCIS.**

- Continue to get user input to create an even friendlier system.
- Review system and update on a regular bases.
- Support ways to expand.
- Require that all licensed building code administrators take a class in the workings of the system.
- Pages too busy, create flow chart type browsing.
- Better navigation on the site.
- Education.
- Get the information out to us.



- Keep the communications flowing.
- Most manufacturers keep this data in an Excel spreadsheet. The system should have a mapped template that could be given to the user to populate and upload at one click. The database structure probably can't handle a change to allow the products to be searched by marketing name or model number; I think it is unlikely that this can be fixed. Perhaps links to privatized databases might work?
- Keep it current.
- More information.
- Complete the BCIS while eliminating the "old" system.
- More audits.
- Develop a reach out program for enforcement agencies to become more familiar with the system.
- Just keep monitoring it.
- Make it more user friendly and easier to find info.
- Just do it.
- Just keep up the good work.
- Information concerning the BCIS has been limited to my knowledge. Once again may be an internal problem in my jurisdiction.
- Develop an electronic copy and on-line availability of the FBC.
- Update and educate more effectively.
- This would be easier done if we adopted the ICC as the base code.
- Low cost access to the codes and interpretations.
- Provide more education and training on the BCSI functions and program.
- Totally unfamiliar -- so is everyone I have talked to -- guess we don't need it.
- Educate the people of their existence.
- Easier way to find information needed, and may be information on available training.
- Needs continued effort to involve all elements of the FPC.
- It needs to be more user friendly and easier to navigate.
- Consider a re-design of the website to make the information easier to access.
- Give us updates more than once a year.
- Make for a more user friendly and easily accessible to owners/architects/contractors.
- Eliminate the requirements and provide insurance discounts based on compliance with specific code improvements.
- Would like to see some cross referencing opportunities.
- It would be great to get these answered within the week.
- Consider the end user.
- Keep site updated and have search engines which would allow individuals the capability to research items for interpretation purposes or other uses.
- More training is needed.
- Educate public on what it is.
- Don't know enough about this to comment.
- Need better coordination between the codes.
- You need to get publications like Building Standards Magazine on line which interpret the Code. Explain BCIS - even as part of the survey. Those working in the industry may recognize who/what it is once it is described.
- Make sure we all know about the programs provided.
- Not familiar with this system perhaps needs to be more advertized in the building departments.
- Keep up the good work. Kudos to DCA staff on this one!
- Simplify.
- Make it relevant.

## XII. MANUFACTURED BUILDINGS PROGRAM

### How well is the Manufactured Building Program functioning?

Ranking Scale	5	4	3	2	1	Average
Total	5	4	3	2	1	3.2

#### 1. What is working well with the Manufactured Building Program.

- Information is available on-line.
- Everything seems to be working well...no news is good news.
- Slowly getting consistent.
- For everything but buildings designed as AC and DC power control rooms.
- Detailed requirements.
- We only have one or two a year at the most.
- The approval process.
- Plan submittals that provide both model codes, product approvals, etc.
- This works well and gives uniform control as long as in plant inspections are followed.
- Everything.
- It works.
- Is this mobile homes!!? There is always a question whether mobile homes, trailers, or so called manufactured homes fall under Department of Motor Vehicles or the Building Department...this needs to be clarified.
- Information is easy to locate.
- They are being built better with safer material.
- System of plan and building inspections to improve construction and safety.
- Plans and construction are doing well.
- Seems to be working well.
- Manufacturer's seem to be following state guidelines and code requirements on the buildings permitted in my jurisdiction. --.
- Some uniformity.
- It is much easier to get a plan of a building than a product approval.
- The manufactured building program helps the plan review process to improve the plan review timeline for permitting.
- Providing cheap housing at a minimum code design.
- The State wide approval system for building manufactured off site.
- Not knowledgeable, but, my perception is that it is much better in terms of product quality than without the program.
- Glad to have them, they have been helpful when questions arise. Most common contact is for Mobile Home details, Phil Bergelt and his group have been most helpful over the years. Yet activity is way down.
- The buildings seem to be built better than in previous years.
- No comment. I have very little interaction with this part of the program.
- Local P & Z.
- Seems ok.
- Appears to be working well.
- Turnaround time.
- Seems to be working well.
- Most manufactured plans that come through are doing so with all appropriate documentation as it applies to the life safety and design of the structure.

- Very seldom interact with this industry.
- We do not have many Manufactured Buildings in our jurisdictions.
- Not safe.
- Very helpful when dealing with modular structures. Easy to understand. Helps to find the plans when you cannot locate them.
- Insignias being attached at the plant is good.
- Expedites plan review process.
- Works well, mainly because it has been around so long.
- All information required is provided on a timely basis.
- The state has one.
- Standard plans by sectional housing companies are being certified.
- Approved manufacturers can be seen online. Rules can be seen online. FAQs are available for the public.
- Insignia program is helpful.

## **2. What is not working well with the Manufactured Building Program.**

- Energy calculation are not site specific and equipment sizing is often incorrect. Manual J with proper orientation not provided.
- Interpretations and application of the code keeps changing.
- Buildings designed as AC and DC power control rooms.
- Red tape.
- We have had specific problems with construction not matching the plans, code violations in the factory unit, missing components, and poor warranty repairs by manufacturer.
- Oversight and inspections appear to be poor based on problems seen in the field.
- The only independent agency is a government agency. I don't think that a company hire by the manufacturer is an independent agency.
- Interpretations keep changing.
- Needs to be more flexible to allow new products.
- Sometimes, wrong code applications are applied from say other states. This too goes for product approvals that may be fine in other states but may contrast what we enforce in Florida.
- On occasion we have had wrong materials in a certified coolant building. It was corrected immediately on the one occasion it occurred.
- I am not sure of the scope and capabilities of the Manufactured Building Program.
- I have still noticed the placement of smoke alarms not being placed according to code and yet they are passing inspection and being sold.
- Seems to be working well.
- South Florida relies on competent inspections of the structures prior to discharge from the factory. The does not recognize the length of the trip, wind conditions (sustained highway speeds, cross winds, etc) during transport from a factory.
- For the most part, plans for the Manufactured Building Program are not accurate and do not comply with the requirements of the building code.
- Education of the public and suppliers.
- Everything.
- Education and training is lacking on this program.
- All over the page -- no one really understanding -- many different ideas and understandings.
- No DCA training on a regular basis.
- Nearly every pre-approved plan can be found to have code violations that were not picked up by the initial plan reviewer. Also, the quality of the construction in some of the newer manufactured buildings

seems to be slipping.

- This needs more work. I would not live in one.
- The process sometimes does not take into account all FBC requirements.
- Manufacturers don't want to document compliance with the program when providing manufactured buildings for local approval.
- These buildings still need to come in line with the building codes. From what I have seen the electrical requirements for receptacle spacing and GFCI requirements are not being met.
- There is a distinct difference between manufacturer and modular construction - both have its shortfalls.
- Local municipalities.
- It's a conflict of interest as explained earlier.
- Found most didn't comply with codes.
- The up to date availability of verification approved plans on line.
- Better preparation of the architectural industry related to approvals for buildings and clarification for relocating approved structures with in different wind zones and flood zones.
- Smaller shed type buildings or canopies should have some type of insignia.
- Manufacturers do not understand what they can do and not do.
- In my opinion the FBC is still not dealing adequately with fire safety and termite protection in manufactured housing.
- I haven't had to inspect mods in a few years, but the generic anchoring details that were provided were old and not used anymore and when questioned, the structural designers would say that it was an old detail and they can do this or that instead.
- Have not experienced and issues with this program.
- The problem is not so much with the building process, it is what is done afterwards. All too often changes are made, but because it is a manufactured building local inspectors are unable to make corrections. There is too much misunderstandings about these buildings.
- School board buildings plans not available for viewing/copying when sold to private vendors. Building departments have no way of verifying that the building installed is the one approved.
- Plan review is not always accurate.

### **3. Respondents specific recommendations to enhance the Manufactured Building Program.**

- Require energy calculations to show all 8 points of orientation for proper equipment sizing and climate zone.
- Once a building is DCA approved and is non-combustible it should be able to be moved throughout the state provided it is site installed to meet the locale wind speeds.
- Streamline process.
- Get the information out there.
- Florida Department of Community Affairs should have inspectors and plan reviewers that verify the "independent agency" material.
- I am not aware of any problems with the system.
- Put a little common sense into it.
- Make sure product approvals and code languages are uniformed across state lines. This is perhaps more outside the scope of FBC but can be problematic in rare instances. The one solution is meeting between building and fire and applying the FFPC and FBC in areas we deem gray but can get these items worked through to meet Florida standards.
- It works quite well. May be a little more oversight.
- Start enforcing the life safety code, inspect wiring, Don't staple wires. Install the smoke alarms/detectors according to the Manufacturer's instructions. Some of the installs that I have seen are not installed per

code.

- Revise codes to include detrimental conditions caused by lengthy transportation.
- Provide more training on this program.
- A standard plans examiner license should be required for all manufactured buildings the same as is required at the local level.
- Place a moratorium on manufactured buildings.
- Provide more education and training on this program.
- Plan reviews should be checked to minimize the number of non-compliant deficiencies left in the plans.
- These units need to be made out of products that can be purchased at a local hardware store.
- We have little to no manufactured buildings installed or permitted within our jurisdiction.
- An active feedback process from local building official of what code violations are found in the field on manufactured building approved through the state system.
- Have more inspections in the plants for code compliance.
- Ensure compliance with the national model codes and standards.
- They really should upgrade their engineering ... especially in Florida.
- Allow the local authorities to maintain control of the plan review and inspection process.
- Get better qualified plant inspectors.
- Require a mandatory final inspection of the installed product by the local jurisdiction.
- Adopt The ICC Code.
- Include wind design loads, flood zone, codes cycles etc on front page of all approved plans.
- Integrate with the Florida Product Approval system.
- More training.
- The FBC has begun dealing with hurricanes for sectional housing but not the popular add-ons, e.g. carports, decks, storage structures, sunrooms etc. These are a hazard in storms.
- Clean up the cookie cutter design plans.
- From prior jurisdiction information this program needs to have more information to the jurisdictions and train inspectors on the difference between mobile homes and manufactured homes increase the information on requirements for inspections.
- Allow local oversight. Another set of eyes does not hurt. These buildings are often overlooked because they are pre-manufactured, but we have had a couple that were said to be factory built, but were in fact site built under the guise of factory built. Local inspection would help prevent abuse by abusers of the system.
- When a School Board wishes to sell or give their manufactured buildings to private owners, the plans should be required to be filed with DCA.
- Plans examiners need better training.

### **XIII. PROTOTYPE BUILDINGS PROGRAM**

**How well is the Prototype Building Program functioning?**

<b>Ranking Scale</b>	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>Average</b>
<b>Total</b>	<b>8</b>	<b>33</b>	<b>89</b>	<b>20</b>	<b>52</b>	<b>2.6</b>

#### **1. What is working well with the Prototype Building Program.**

- The process works when the local jurisdiction allows it to.
- I have never seen this used.

- Everything seems fine.
- In theory it is wonderful.
- That it is available.
- Good to have "pre-inspection" approval for something that will be repeated.
- If you include the small sheds etc. then it is good.
- I am not aware that there is currently a system in place.
- Hard to say since its suspension.
- This could be a fantastic program. I can't understand why the industry opposes it.
- I have not had any requests for prototype building.
- Not a whole lot --Keith Perry, Fire Inspector
- Not a process involved in.
- Nothing if not being used.
- I have no experience with this program.
- Seems to be working well.
- Nothing is well with the prototype building program.
- Program abandoned.
- Obviously it's not working.
- I do not have much experience with this type of plans.
- No comment. No interaction with this part of the program.
- Works as a peer review before submitting for permits. Would speed up the permit process due to less generated comments and accomplish what is trying to be done with Manufactured Building Program without taking the control away from the local agencies.
- It's suspended.
- What program?
- Never have had a permit for a prototype building.
- Never had a use for it.
- As told in the opening statement, it is not being used so little information is available.
- Not there.
- Have no knowledge of the program.
- Another good but 'unfunded' idea. Can't get people to work for nothing. How very 'Florida'.
- I'm glad it is not working.
- No one is using the product.
- I have essentially no experience with prototype buildings so I can't really comment.
- I have no personal experience with this program.

## **2. What is not working well with the Prototype Building Program.**

- System is not effectively used and there has been no time or funding to analyze problems.
- When the local jurisdiction insists upon a full review and a full fee. This is clearly being done so that they can generate the revenue.
- The local jurisdictions vary widely on how well they recognize it.
- That it is not a research driven process.
- Not very well publicized.
- Maybe a statement could be affixed with the state label that directs the seller or purchaser to check with the local Building Dept for any applicable codes.
- I am not sure of the scope and capabilities of the Prototype Building Program.
- No issues.
- Seems to be working well.

- Total nonsense.
- Everything.
- See your own note.
- Seems like no one was using it much...perhaps that is because there is not really any such thing as a prototype building and because of the local administration aspect of the system.
- Not many in system.
- Cost should be the responsibility of the owner/architect/contractor not that of the state.
- The whole process requires so much work that the small builders do not see a benefit with local jurisdiction requirements for compliance.
- Use.
- Local officials don't understand program and courts and lawyers don't understand what a prototype is. They still think all buildings are site specific as I have recent experience.
- I'm glad it is not working.
- No one is using the product.

### **3. Respondents specific recommendations to enhance the Prototype Building Program.**

- Time to evaluate system.
- Give the local jurisdiction no alternative except the enforcement of zoning provisions.
- Have more consistency in its use.
- Generally Prototypes are not adapted well to site conditions - and this often works against urban conditions, sidewalks, placement, and works only on large tracts of land with parking lots, which we should not be doing.
- More research driven decisions on what should be done.
- Get basic information to consumers.
- Get the information to us.
- Re-instate the program.
- No knowledge of this area.
- If there a significant number of prototype Buildings implement the program.
- I have no recommendations.
- Do not allow prototype buildings.
- Research money is needed, but unlikely in current economic climate.
- Scrap it.
- Improve education and benefits of participating.
- Little knowledge.
- Replace the Manufactured Building Program with this one. Gives the owner/architect/contractor (at their own cost) to have a peer review before submitting to the local agencies and lessens generated comments which would speed up the permitting process.
- Kill It.
- Discontinue it.
- Treat the proto type program like the modular building program.
- Need to scrap.
- May want to try structure integration with the Florida Product Approval system.
- Tank it.
- Put one in effect.
- Eliminate the program.
- You need to get universities involved in this and help them get R & D grants.
- Some day it might work.



- Forget it. Again, it is subject to abuse.

#### **XIV. PRIVATE PROVIDER SYSTEM**

##### **How well is the Private Provider System functioning?**

<b>Ranking Scale</b>	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>Average</b>
<b>Total</b>	<b>15</b>	<b>42</b>	<b>84</b>	<b>47</b>	<b>53</b>	<b>2.7</b>

##### **1. What is working well with the Private Provider System.**

- It works well when the locals respect it.
- The review process is faster and there is an open dialog between reviewer and design professional.
- They go a long way in providing the required information.
- Plan review and inspection options speed up the code enforcement process.
- That it exists and is available to owners where time is important.
- It provides a forum for legislative issues that should be determined and dealt with through the Commission.
- Contractors can get inspections when they want them.
- Allows companies to choose.
- Quicker.
- During extremely busy times it takes the load off of building divisions.
- Private providers work when they are direct contractors to local government. No conflict of interest develops.
- Allows projects to be started quicker.
- The ability of local jurisdictions to speed up the process of review when they are normally overloaded.
- Getting plans out, usually consistent code interpretations.
- The private provider system (FS 553.791) has worked well for us and has been a good program.
- When we get dedicated participation it works well. Just like anything else, it comes down to the people doing the work.
- The program itself and it sends the message to the local building department if you can not do it we can today.
- The potential to get through the review process faster.
- Not sure what the private provider is.
- I've not been involved in the PPS.
- A local company with inspectors knowledgeable with our local needs help. We have one site inspector who I trust immensely with underground piping and he communicates with me effectively on each project. we have built a trust system where is knowledge base allows me to empower him on some decisions when I cannot make it to the inspection or if I am on leave.
- The Private Provider system works when the inspectors and plans examiners work for local government.
- I don't think it works well.
- It works when needed.
- It allows competition to regulate itself.
- No current knowledge of this area Code enforcement. And approvals is a jurisdictional police function - do not limit the function by permitting third part enforcement.
- Strict standards.
- It works.



- Not much.
- Helps to move the project along.
- Fills the gaps in inspector availability.
- The private provider system provides an additional outlet for reviews.
- It's there if we need it.
- I do not like private provider systems.
- Don't use them in my jurisdiction.
- Poor Quality. .
- Seems to be working well.
- Efficiency.
- On some occasions they have worked well for projects on extremely expedited timelines. Requiring a CO from the Building Official. Definition of permit application date in statutes should be expanded to apply in all statutory permitting timelines.
- Works well.
- It is available to those who wish to use it.
- Private providers provide an alternative when the local AHJ does not have the resources to provide a certain service.
- Provides licensed people in the absence of local staff -- good fill in – only.
- They are going after services.
- The manufactured building program where plans are pre-approved for the DCA.
- Alternative to lengthy jurisdictional approval.
- Cheap labor - you get what you pay for.
- They exist and are profitable.
- AHJ involvement shall be mandatory.
- It is not.
- This is not working in my opinion. The private provider system favors the building owners at the expense of good code enforcement.
- During active times it helps all to keep construction activity working.
- A needed system when government cannot.
- Very little.
- We use PDCS, no problems.
- It provides an option for employees and employers.
- This is good when the times are demanding for the building departments to fulfill the inspection needs of contractors. This may be due to after hours or when the amount of buildings to inspect can overwhelm the building departments.
- No comment. I have never seen this process utilized.
- Provides an opportunity for an appropriate entity to choose the source of inspection services thus eliminating the possibility of prejudicial treatment. Private Provider serves a purpose.
- It allows some agencies to speed up their review time.
- Documentation they need to provide.
- Already discussed.
- Allows flexibility, particularly when permitting was taking months to accomplish.
- Private providers who operate the local building departments seem to be working well.
- Not much.
- Forms are relatively simple.
- Never have had a need for a private provider.
- Assisted the public during busy time of construction.
- Allows for easy expansion and contraction as work requires it.

- Nothing that I can see.
- It provides guidelines to Government entities in how to use the program and also allows municipalities, counties and districts with the capability to be flexible with limited staff or unusual projects.
- It is vague.
- It gives an alternate to owners over building departments.
- They are out there.
- Frees up reviewer to do other reviews.
- Have no knowledge of the program.
- They show up on site and are good about coming when called for.
- Improved timing.
- Not used in our jurisdiction yet.
- This has filled a void that was needed.
- Creates provider jobs.
- I do not see any good in the private provider system - not because I am an inspector/plan reviewer hired by a governmental agency, but because as stated above, it is subject to abuse and mistakes.
- Contractors are getting away with murder.
- They are able to assist some smaller Cities.
- We are contracting private providers to assist with the building code administration. We have found it works very well using private providers to assist the in-house building code inspection services. This allows additional code inspectors during peak inspections times.
- My experience with private providers has been fairly positive. They seek to understand the requirements and processes of the jurisdiction they are working in.

## **2. What is not working well with the Private Provider System.**

- The system can and has led to abuse.
- It is difficult to utilize effectively in many jurisdictions. They resist it, insist upon performing full reviews and inspections and charging a full fee. It often results in more costs to the project not less. It does usually speed the process somewhat.
- We have had two go out of business and left the owners and contractors high and dry. We have also filed complaints on inspectors that did not do proper inspections resulting in a loss of licensure.
- Human personality issues of non-acceptance from time to time.
- Too many private providers are being used to circumvent proper inspections by local jurisdictions.
- When a provider is discouraged, they tend to back off and not pursue their goals.
- Private provider abuse requires investigation- private provider is not the AHJ, and cannot require/approve changes in plans/work without the involvement of the AHJ. Building departments still take weeks to approve plans already approved by PP.
- Frowned upon by most building departments. It takes away the few jobs they are holding onto so they don't like that.
- Lack of consistent quality control policies.
- Training is needed to make sure each application is correct and complete.
- The cooperation between the government sector and the private sector.
- It is my experience that many of them are slack and miss a lot of important items. My experience was with them missing life safety egress and accessibility items.
- Sorting out good v. bad providers.
- Cannot establish relationship with Inspector to know the hot buttons.
- I have limited experience but what I did encounter is very poor inspections, records for review. I stopped inspections from two successive inspection companies. Both out of business.

- When private providers work for a contractor or developer, an inherent conflict of interest is created. We have received many requests from private provider inspectors asking us to help them because they cannot enforce the code or else they will be removed from the job.
- The local authority is still the authority and they tend to not exercise any judgment when the review is performed out of office. The responsibility of the private provider is to apply the code - not address matters of interpretation. But the officials tend to defer that role when outside providers are used.
- Not enough of it going on.
- Quality and consistency of the Providers.
- Some private providers poorly manage their business and this causes additional work on the Building Department.
- Contractors view private providers as a sub-contractor and I believe this relationship could lead to problems. In addition, contractors think it is a way to side step the Building Department.
- The original intent of PP was to give contractors a back-up plan when the Building Department was too busy to provide timely reviews and inspections. Instead, it has undermined Building Departments and compliance is harder, we are viewed as replaceable.
- Inspectors are less than adequate and are easily influenced by pressure from their Supervisors. If a Company is too thorough the Contractor will not hire them.
- Private providers continue to sign off inspections that have not actually been performed or the work is not done properly.
- Private providers given too much leeway with little building department oversight. They are used as a way to avoid building department oversight and rush the job through.
- I don't think that a company hired by the owner has any independency to review and inspect buildings.
- Local officials get vindictive for "side-stepping" them. When they are backed up they don't mind. When permit fees are down and people are threatened with lay-offs of staff, they get very territorial.
- Inspections are driven by and incomplete a false sense of security is assumed by the owner every follow-up I have made behind PP has been a disaster for the builder many Contractors in the NE use PP because they cannot pass an inspection by the Building Department.
- Horrible: this is where we see contractors skirt around the FBC. We see absolute graft. So many of our homeowner cases involve a private inspector.
- Nothing it just needs to be used more. The time to get a permit is increasing even though the demand is going down.
- Owners have little incentive to use it. It promotes lack of consistency within code enforcement jurisdictions.
- Some private reviewers we have encountered during our busy years did not even consider the fire code application causing major heartburn in delays of the project and some were even stuck on older model codes.
- The system does not work when the Private Inspection Providers work for the contractor or owner. The relationship is too close and results in a conflict of interest between the parties. It can too easily become a choice of keeping the contract or violating the code.
- The private provider system encourages owners and builders to seek out a company to rubber stamp their project. Why would they turn down their employer's work, or the project they are being paid to approve? When they fail, the local authority has to come in and clean up the mess.
- We have had incidents when inspections were done prior to a permit being issued and caused a hardship for the owner.
- Agencies defeat the competition.
- No knowledge of this area wide open liability.
- It's all OK.
- Personnel are not held to the same standard as Government personnel. They are allowed to act as

contractors in the same jurisdiction as they conduct inspections. This is outdated and needs review. Private providers do not seem to do as good a job as our building officials.

- Ethical dilemma...paying for an inspector PAYS for the result you want.
- Lack of oversight sometimes by engineer.
- Mix in information from building to fire.
- The private providers are/feel obligated to builder/developer who is paying their salary and may not be as diligent as they should.
- Department oversight of plans review by the private provider is nil or lacking. In the current economy, fewer people are using the Private provider system because of the additional fees and because fewer permits are being applied for.
- Communication with the fire service.
- Sometimes the provider has no dog in the race!
- Do not use them in my jurisdiction.
- The private provider in one of our contract communities has not provided them with emergency contact information so we can contact them to get an unsafe building posted after a fire.
- The requirement for an engineer (not licensed as an inspector) to oversee a licensed inspector is onerous and obviously politically driven.
- Seems to be working well.
- no one knows what it is.
- Government employee opinions.
- Frequently have found extreme code violations in design and construction.
- Pain in the ass.
- The current economic climate means that there are less opportunities for all. It will be several years before this changes. .
- I believe that it is used to bypass the local authority. We have had to follow up on most cases. Especially plan examining. It sounds good but without a third party that is not directly paid by the contractor or developer. Those that work directly for the local jurisdiction have worked well.
- Have seen a few questionable approvals by private providers.
- Private providers used in the past for the L.C.S.B. have provided minimal help. They don't seem to take ownership as well as in house personnel.
- The accountability, ethical, and regulatory oversight of the private provider is not there.
- It allows jurisdictions to avoid full time employees \$\$\$\$ it keeps jobs, good jobs, away from general qualified people.
- The need for this service is non-existent at this time for our area. There are always local issues that come into play that the private provider is not concerned with; such as height limits, setbacks, parking, etc.
- The system is corrupt! There are numerous lawsuits against private providers. One committed suicide rather than face the charges. Another large engineering firm went out of business because of all the lawsuits.
- There is not enough work for them to survive.
- The concept of offering an owner with an alternative means of plan review and inspections to expedite the permitting and construction process may be thought worthy by some, but it has been my experience that the quality of the services from many private providers has been less than average, at best.
- Program abuse - by licensees delegating work to unqualified individuals.
- This is where the fox is watching the hen house. I feel these people have a lack of professionalism and the volume generated inspection is based on how much I make.
- They, for the most part have no ethics. They pass/approve everything. the people who own/work there are in it for the cash and care not for the municipality.
- Too many private providers are side-stepping the AHJ process and projects are too far gone for

corrections to be made.

- Private Provider approves everything right or wrong to keep builder happy and get the next job.
- It seems that there may be some bad leeway but with review by all involved it will work out.
- This is not working in my opinion. The private provider system favors the building owners at the expense of good code enforcement.
- Individuals have agendas that do not reflect the needs of the hiring agent.
- Needs to ensure accountability.
- Contractors do not understand the process or try to circumvent the legal process even after it is fully explained to them.
- The private providers can get fired if the contractor does not like the inspection results. The inspectors sometimes are not given the same authority from the builders as a inspector from the city or county. The comment I have heard is they will just get another private provider if the item does not pass.
- Not used very much in this area.
- Money talks. It is easier to bribe a private employee than a public employee. The risk of impropriety is greater with private providers.
- Consistency and quality of inspections and plan reviews. Received one private review of an eight story type two condo approved with a wood exit ramp from the second floor.
- They don't perform inspections the way building departments do.
- Already discussed.
- The system seems to work well.
- The private providers contractions directly with the owners or contractors are in many cases the hounds are watching the henhouse. The private provider is paid by the customer to insure the customer complies with code, what on earth could be wrong with that?
- The insurance requirements indicated in the statute and the overall concept of having a private entity certify projects that will have some time or cost benefit. This has never been proven in real world application. The end result is always dual inspections for each discipline by different inspectors resulting in discrepancies and confusion at the jobsite.
- Does not work well since it costs the contractors twice as much and does not advance the plan review process nor the job.
- Some inspectors in the field are not certified and are working under engineers supervision. Private providers under pressure to "pass for pay". Plan review and inspections are not complete. Inspections and for profit companies do not mix.
- Plan review and inspection are treated with an accent toward pleasing the contractor and paying little attention to code. And because the contractor is allowed to proceed if the special inspector passes the inspection, anger results when the contractor has to go back and undo previously approved work. Costing much time, money and frayed relationships.
- Under no circumstances should a Building Official be required to issue a C.O. for a project their department has not inspected. A classic case of those unwilling or unable to comply with the Code, buying approval from unscrupulous providers.
- Insurance requirements after the project is complete are difficult to enforce. Consider a bonding requirement for a specific time period or eliminate the continue insurance requirement without clearer direction for enforcement.
- Profit motivated.
- Saw some discrepancies overlooked in inspections during the busy construction boom.
- Us versus them attitude from the building department employees. Usually the private provider staff is from the same pool of people that the public sector building department staff is from. Once the individual moves from the public sector to the private sector, it seems that they are given less respect from the building department's public sector employees.

- The only experience showed that the system did not provide adequate technical review.
- It allows to many small municipalities the option to go with a Private Provider when there are large municipalities adjacent to them which could go into an inner local agreement with them.
- Not enough information.
- It's not consistent with AHJ interpretations and liability issues.
- Lack of understanding by the private providers and the code officials.
- Private Providers, from I've seen, are not meticulous in their review of the design with respect to the Codes.
- They are expensive.
- No familiarity with this.
- Uneven enforcement / interpretation. Cost.
- The system is not monitored properly too many drive by inspections and pay for pass mentality with the inspectors. The allowing of private providers to provide building officials to jurisdictions is taking the rules out of context and should be stopped.
- Turf wars between municipalities and the private providers.
- This is the fox guarding the hen house Nothing is good from it.
- Too much money is involved and therefore there is influence in reviews.
- Finding knowledgeable local providers.
- The person doing the review should not be directly paid by the property owner I believe this to be a conflict of interest.
- I do not see any good in the private provider system - not because I am an inspector/plan reviewer hired by a governmental agency, but because as stated above, it is subject to abuse and mistakes.
- It is an inherent conflict of interest.
- It does not make sense to have the person designing the building or system to also do the plan review and inspections.
- The fact that they are motivated by inspection(S) and sale of permits. They are not customer service friendly.
- Private providers are retained by owners, contractors, and developers and consequently do not have the necessary objectivity to completely enforce Code requirements. Private providers do not know or follow the proper procedures as set forth in State Statutes. Private providers do not submit paperwork in a timely or complete manner to the Building Department. We have observed the following: - do not provide proper notification when they are doing plan review. - apply for permits after a job is started or done. Final building permits with no sub-permits issued. - perform inspections before a permit has been issued. - perform inspections before the Notice of Commencement is filed. - do not notify the Building Department when they fail inspections. - schedule inspections with such rapidity that proper audits are not possible. - do not submit engineering reports requested by their own inspectors. Issue C/Os without regard to holds by other departments (Zoning, Fire, Engineering, etc.) - do not follow requirements when paperwork is required to be original, sealed, and/or notarized.

This process does not benefit local jurisdictions.

- This program has the fox guarding the hen house. Based on my experience if a private provider does his job correctly he will go out of business because he will cost the contractor or developer (his client) money and will not be rehired for the next job. Money will sway the decisions of almost all the private providers as they must keep their client happy. It does not serve the best interest of the public or the owner. This is the same reason public officials are not permitted to take gifts or gratuities from the private sector, it could and would sway decisions.

### 3. Respondents specific recommendations to enhance the Private Provider System.

- Reevaluate the procedures to minimize abuse. Create a threshold for the use of the system based on the service provided by the regulatory agencies.
- Allow it to work and insist upon the local jurisdictions complying and not interfering.
- Do away with it.
- Reinstigate the "Permit by Affidavit" provisions of the SBC for design professionals that become certified plan reviewers/inspectors/building officials.
- Make an agenda item for the Building Commission to establish uniform QA methods.
- Mandate that the playing field be the same for both. It should not be possible to have a plan reviewer or building official out of state and responsible for a project in Florida.
- Rating system.
- I think we have a systemic problem with private providers due to loyalty for lack of a better term, when the inspector is inspecting the person (entity) he is working for. The old "Fox guarding the hen house" adage. Code officials at the governmental level are working for the state and being paid by the local governmental entity and legally protected in their work as long as there is no dereliction of duty. The private provider can get fired for doing the job correctly. Profit and job security trumps the Code. Get rid of it.
- Modify state law to ensure that the integrity of the system is maintained by having private inspectors report directly to, and be paid by, local government.
- Re-introduce the Chapter One provisions that give specific roles to the players in 104 and add specific language for the private provider role.
- Closer control and auditing of the companies.
- This service is under utilized. The FBC should promote the use of private providers for use in logistically challenging inspections such as, re-roof, roof deck inspection, after hours, etc., for contractors instead of some jurisdictions accepting affidavits of compliance from contractors.
- Abolish the system.
- Abolish private providers.
- More oversight.
- It should be a government agency the one in charge to hire private providers if the owner want that the building be reviewed that way. It should be rotation list of providers and any provider that is in the list will review and inspect the drawings and documents and will inspect the building.
- Take the local Building Official out of the process. Deputize or find another method to insure that private providers have the same authorities as local building officials.
- Do away with the system.
- Make it easier to use.
- Get rid of it.
- Explain/ share with end users the provider system.
- Effective communications needed with private providers. Better accountability management is needed to make sure correct applications of model codes are being incorporated. Detailed resume of KSAs of private providers is a must to determine levels of trust pursuant to the project.
- Eliminate the ability of contractors and developers to hire their own inspectors. However, provide additional statutory language that will force local government to meet specific customer service benches and retain additional contract inspection staff on a project by project basis if deemed necessary to meet the benchmark.
- Abolish it.
- WE have to maintain a 100% audit of their work to keep them on their toes.
- Drop it altogether.
- Suspend the process and review the laws. Personnel for private provider firms should be held to the

same standards as government employees particularly with regard to contracting in the same jurisdiction they inspect.

- They need to be held accountable or done away with.
- Provide a limitation on private provider fees.
- Jurisdictions need Building Officials and Fire Officials.
- Monitoring for compliance with codes.
- Require the private provider to distribute emergency contact information to the Fire Marshal having jurisdiction.
- More oversight to keep communities safe.
- Remove the requirement for engineering oversight and allow those licensed to perform the work the ability to do so.
- I have no recommendations.
- Get with you customers and treat them like customers.
- Require plan review and auditing of inspections.
- Discontinue the private provider system.
- This is currently driven by a conflict between building department revenue shrinkage and their desire to hold onto what little revenue stream that have. Until the economy rebounds, this will be difficult to overcome.
- Only allow them to work for jurisdictions.
- Provide more oversight and regulatory control of the program.
- Allow Private Providers, only in the case of fill in for vacancies due to illness, vacations or termination --- not be allowed to do full time duty.
- Eliminate the private Provider Laws. Who thought we would even be talking about the "Fox watching the hen house".
- Our specific involvement has been in the area of mechanical smoke control on new construction.
- We are less than satisfied with the trend to outsource from the City of origin to a private provider. The process has been less than smooth and many questions of protocol remain unanswered.
- For many private providers, the Alternative Plans Review and Inspections procedure is not full-time, but their time is split among other private sector employment duties. This permits licensees to become "rusty", and coupled with the profit motivation, these providers tend to be less thorough than otherwise. Increase the number of CEUs that private providers must earn for recertification, and the increased number of hours be strictly devoted to the Florida Building Codes.
- Tighten up the process to avoid abuse.
- Government needs to provide this service. The wages need to be paid with permit revenue not with assistance from the developer.
- Disallow them.
- Tighten requirements for Private Review.
- Eliminate it.
- There appears to be a general consensus that private providers are too often "selling" their services to contractors/owners/developers who want to circumvent local enforcement of the code. Follow-up of private providers over a period of time will prove if this is in fact occurring.
- Eliminate the private provider option.
- Require more inspections by the local authority having jurisdiction and better communication between the private provider and the building departments.
- My recommendation would be to eliminate private providers altogether.
- Require review of private provider work.
- Nothing as they seem to have been phased out.
- Kill the inspections only contracting! The citizens are better protected by a third party jurisdiction not



getting money directly from those their charged with regulating whether the jurisdiction is run by a private company or a government.

- Reevaluate the reason for the Private Provider provision and the actual real world applications and rework the process to provide something that is beneficial to the end user (owner) and others involved in the process. At this time there is no proven direct benefit to the public with the statute.
- Only use them where the local government does not provide building plan review or inspection services.
- Limit powers of private providers. Make sure any ownership does not make laws or rules to benefit private providers.
- Getting private providers to stop using unqualified inspectors. And training their plan reviewers and inspectors better. If I had a private provider company, I would want my people catching the city inspectors missing things, not having the city tell me what I missed, which is what happens at least 50% of the time.
- Eliminate it.
- We have not had anyone use a private provider.
- Have all private providers work for the CBO, instead of allowing them to be directly employed by developers and contractors. It seems to soften the credibility issues.
- Provide more focus on building department training.
- Make more specific guidelines outlines in the statutes to give the private provider more specific guidelines in their responsibility as Private Providers.
- Get rid of it, or have all private providers approved by local AHJ.
- More training.
- What is the Private Provider System?
- A better checks and balance system whereby there is accountability when non-compliance is cited continually.
- More competition.
- No familiarity with this.
- Keep the program active but encourage independent plan reviewers to follow the same/similar interpretations as government reviewers. There must be predictable / reliable application of code.
- Remove it from the books.
- There seems to not be many regulations for "contract" providers. Contract providers are not government employees (except by contract) nor are they private providers. Not exactly regulated in my opinion.
- This is a complicated issue and gets into personalities. I believe this would best be reviewed by a study of the program by a dedicated panel or group, such as BOAF, interviews with parties on both sides, including owners, contractors and building departments, and then to create a plan for implementing needed changes, if any are found.
- Do away with this. You need a cross check from design and inspection.
- Only have limited experience and it was better than local building permit reviews.
- IF the State wants to allow full time private provides to review and inspect facilities there needs to be a Code competence test or something that requires the individual to be competent on all aspects of the Code(S)that are signing off. We continually receive plans that are non-compliant. Not with just small incidental item but egress, finish materials.
- The architects and contractor should be doing their research and providing compliant plans.
- Get rid of it or require local inspections as well. It is the fox guarding the hen house.
- Eliminate it.
- Because of the conflict of interest inherent in this arrangement, encourage smaller building departments to contract with neighboring larger ones in situations where they are unable to provide the required review and inspections themselves.

- Do away with the program. If a contractor/developer wants to hire a private provider to ensure what is being designed and built is being done correctly prior to the local officials review and inspection that would be okay, but the local oversight should not be circumvented.

## **XV. INTERACTION AND COORDINATION BETWEEN THE FLORIDA BUILDING CODE AND OTHER STATE BASED BUILDING CONSTRUCTION REGULATIONS**

(Examples: DFS: Florida Fire Prevention Code; DOH: septic tank regulations; DOH: swimming pools; AHCA: healthcare facilities; DOE: public schools; DBPR: elevators)

**How well is the interaction and coordination between the Florida Building Code and other state agency building construction regulations functioning?**

Ranking Scale	5	4	3	2	1	Average
<b>Total</b>	<b>48</b>	<b>68</b>	<b>104</b>	<b>32</b>	<b>25</b>	<b>3.3</b>

### **1. What is working well with the interaction and coordination between the Florida Building Code and other state agency building construction regulations.**

- AHCA works quite well.
- Generally we get along well.
- Coordination is virtually nonexistent.
- It seems well coordinated.
- They are in the same book (even though the book is large).
- Why must public schools be built to one standard and private ones to another? What is it about the students in one school type that deserves 423 whereas another does not? Or why must one body spend to accomplish what is not required for another. The basic code works well on balance. Why must we confuse ourselves by having dual standards for virtually identical situations. Saying this I run the risk that the response will be... "ratchet up the requirements for all", when in fact it should be enforce a fair requirement for all. We gain much more from enforcement than we do from unceasing new levels of regulation.
- There do not seem to be too many conflicts.
- Conflicts and misapplications are beginning to be addressed.
- Not sure of the coordination. Unsure as to the willingness of other entities to utilize the codes and standards adopted by the Florida Building Commission.
- Didn't know there was any attempt at a coordinated effort. Maybe that says how well the interactivity is working.
- We work together to make the code enforcement practical and less expensive.
- I believe there is a lot of confusion.
- Fine with the exception of the septic tank issue.
- Everybody knows their area.
- The Florida Fire codes need to take be eliminated as they pertain to construction.
- AHCA and FBC DOH and pools.
- Not much except the integration of the public school requirements.
- Fairly well coordinated.
- Florida Fire prevention code usually interacts well with the FBC.
- Getting much better.
- Some good interaction with UF is leading to insight on several issues.
- Good coordination between the Fire and Building services had developed.

- The other regulations are correlated into the FBC as applicable.
- Because we deal with our local Health Dept we have a good working relationship. Because we deal locally with DBPR from Gainesville we have good relationship regarding licensing and complaints.
- While I have only limited knowledge of this area, it seems to function rather well from my experiences.
- Generally, our inspectors and building departments keep us advised or requirements.
- Have not had any problems so far in getting or finding what I need.
- Compatibility with the Fire Code.
- The Health Department operates on its own. Their process for code development is closed and only they get to decide the right changes to make. No public over sight.
- The building code is getting better with the FFPC.
- Integration of the codes appears to be working well.
- I find it works well and have had little problems.
- So much of the code is similar but lack of knowledge on the part of building departments with respect to the State Requirements for Educational Facilities (SREF) that it makes it difficult to utilize their services for educational facilities.
- Provisions added have some of the minor areas of the code in agreement but occupancies and separations and required protections still in disagreement.
- Compare and contrasting coupled by effective communication is the key to understanding.
- Conflicts between the Florida Fire Prevention Code and Florida Building Code have been eliminated. There is good cooperation between the SFMO and the Florida Building Commission. Both the NFPA and ICC codes complement each other and ensure an appropriate level of protection is provided.
- On a local level there is good cooperation.
- I think the system works well.
- Could be stronger.
- That is does in some matter exist.
- It is not working.
- Again, strict safety rules and codes.
- The codes are becoming a better working document removing many previously existing conflicts.
- It works.
- Some agencies are very difficult and slow to work with - such as Health Dept doing septic.
- Good interaction between fire code officials and building officials.
- Keep the fire department reviewing plans, and inspections for compliance.
- In our jurisdiction, the building and fire official work well together. However, there are times that each jurisdiction may not understand the code or concepts that their respective codes are attempting to accomplish.
- In areas concerning Fire and Life Safety, the building codes are pretty much in alignment.
- Communication.
- Many conflicts between state based and local Florida fire prevention code.
- TAC seems to be working as intended.
- The Florida Fire Prevention Code and the Florida Building Code are working well together. Interaction with other agencies is unknown.
- Leaders communicating and passing on important information.
- We have done a good job of molding the two separate model codes (ICC & NFPA) together.
- Open communication between all concerned parties.
- We are getting better at understanding each other. Fire / Building.
- Most compliment the other.
- We have been very successful in improving the site plan approval process and eliminating emergency vehicle access problems that we previously experienced. This is not the fault of the building department

because most of them have never driven any sort of fire apparatus.

- Regulations are working well together.
- The process to eliminate conflicts and resolve differences seems to be working well.
- I think the coordination between the fire code and building code is working great. There are some items that are not covered in the building code that the fire codes address and likewise with the building code. The two codes work hand and hand.
- Local coordination between the CBO, Code Compliance, and Fire Marshal Fire Prevention Bureau.
- We have a good working relationship with the local building officials concerning the FBF and FFPC.
- We have no problem with this. Building official reviews plans for Florida Building code and I review plans for Florida Fire Prevention Code. Most stringent code will always apply.
- Horrible.
- Important sections of SREF are in the building code.
- The building and fire entities working together to find which codes are more stringent to the occupancy.
- Hard to tell.
- I work with DOE a lot and I think they do a pretty good job trying to enforce the code consistently.
- Coordination and consistency between the FBC and other state codes is getting better each code cycle.
- Depends on who --- sometimes the interaction is great and then another agency or Code won't work well -- kind of split.
- The Florida Building Code and the Florida Fire Prevention Codes work well together.
- Fire Code and Building Code people are working closer.
- The "gap" of inconsistencies between latest editions of FFPC 101 and Florida Building Code has been narrowing.
- Now there is a venue to discuss code issue.
- This will always need improvement.
- Individuals working together to achieve the intent of the code.
- Our jurisdiction is structured to allow the FBC and FFPC enforcing employees to function semi-independently but in a coordinated fashion (we are located in the same facility but with different supervisors) and overall this seems to lend itself to a smoother operation and less "us against them" feelings.
- There is an attempt to accommodate all conflicting issues.
- A uniform set of codes make for a more consistent position for the plans reviewer.
- There is good interaction between the Florida Building Code and Fire Prevention code officials. Conflicts between the codes are being addressed and resolved.
- Very well.
- Fire and elevators are best. Public schools is a closed system, but, functions swimming pools needs more education.
- This is not working well. The other departments tend to feel that they do not have to work with the building departments.
- The regulations themselves have been coordinated with each other better than they used to be.
- The coordination between the building and fire code promulgating groups has greatly improved.
- I can think of nothing working well.
- Some areas allow the permit review process to start while waiting for other agencies to do their review.
- Most of the conflicts have been removed. The present system requires both fire and building officials to work together.
- The coordination with some agencies.
- The other state agencies that require fire inspections, usually will not conduct their inspections until a fire safety inspection has been completed.
- Difficult to coordinate the fire codes with the building codes at times.

- DOH works fairly well.
- The general coordination is acceptable.
- The interaction is working well where it is being administered by people who are interested in providing the highest level of customer service and not into turf battles.
- Working well.
- More cooperation needed.
- A common goal. Customer service.
- Fire codes are becoming better aligned than in the past.
- The only agency's that seem to try to resolve problems is Building and Fire and DOE officials. the others especially DOH have their kingdoms. Although Fire Officials can be difficult when they are the type that want to show their authority. The DOH kingdom should become a village, especially the septic tank division. If we really want to be efficient, sensitive to cost, and not over regulate. Septic Tank enforcement should be put under local Building Departments.
- I deal with the interaction between the FBS and FFPC. The interaction between the two codes works well. The duties of the enforcement of each is clearly defined.
- Chapters 3, 4 and elsewhere do reference state agencies well. Contents of the Florida Building Code and Florida Fire Prevention Code work well together and easy to administer. Few conflicts.
- Many code sections have been coordinated.
- I have not identified any problems.
- Not working well.
- OK.
- We continue to work in interfacing the other Construction Regulations in Florida so they work as one with the Florida Building Code.
- IT is not working, should be part of the code.
- The state has a Florida Building Code and a Florida Fire Prevention Code.
- Codes have become more synchronous.
- This has improved - but still needs to keep moving forward.
- There is some cross over between the codes which helps with coordination.
- Good relationship with the counties fire protection agency.
- Coordination and cooperation between agencies has improved. Having uniform access to all of the requirements has helped this process.
- There is a good working relationship between the Fire and Building; however, they are separate and need to be view as separate.
- Better than it used to be.
- Much better than past.
- That there are individuals from various represented groups on the committees so there should be a broad understanding of the effects of the Code and any proposals.
- As a general rule, I believe that building inspectors and fire inspectors work well together. I do not know that much about DOH. School inspectors believe they are autonomous and often, because they do not specialize, but have all kinds of other duties like fixing toilets, etc. they do not know the codes or in some cases ignore them.
- Local and state officials seem to be working together to solve any issues or differences between the codes, or the procedures for enforcement.
- The interaction of the fire officials and building officials in the plans review process is necessary and should continue.
- They acknowledge each other & defer to the more restrictive code.
- Building officials and fire officials are working closer together to ensure the differences in the FDC and FFPC are applied properly per FS 553.73(1)(d).

- DPPR is working to support the building code system with qualified inspectors to enforce code requirements. DOE has worked with the Fire Marshall's office to coordinate the Fire Prevention Code and its incorporation into code enforcement of educational facilities.
- Some agencies respect the role of the commission to regulate construction.
- There is some effort to coordinate and share requirements but as this still has a long way to go to be ideal. There often are still surprises because various departments don't interface enough.
- The Fire and Building Codes are generally fine.
- I think that the coordination between the FBC and the FFPC is good. There are very few conflicts. Also countless times I have found deficiencies during plan review that were not discovered by the building department and therefore rectified the issues.
- In Volusia County, we have a very good relationship between the School District Building Department, local county/city fire marshals, and Health Department. Officials. We jointly review and inspect School District building construction projects.

## **2. What is not working well with the interaction and coordination between the Florida Building Code and other state agency building construction regulations.**

- Turf battles continue to be fought over governance.
- The agencies are separate from one another.
- Access to information can be difficult and there does not seem to be a willingness from most agencies to interface with each other to correct problems.
- DOH has some turf issues they can't get over.
- There is a lack of interaction. One does not seem to have the "final" word.
- They are not coordinated and have contradictory statutes and exemptions.
- You mean like how the fire marshals want to overlord it over the building departments.
- Swimming Pool issues do not seem clear cut.
- Conflicts and differences between definitions and interpretations needs to be better coordinated and addressed.
- It takes too long.
- Most Agencies we deal with still act autonomously without much concern or consideration for other authorities or agencies or the cost which may be incurred by having to comply with their interpretation, founded or not. Fire Marshals seem to be the least educated about building design and structures, except how to get out of Buildings and fire sprinkler systems, but have a tremendous amount of authority in approval of Construction Documents. There is apparently no recourse to a Fire Marshals demands.
- Not always on same page.
- Most people still appear as a deer in the head lights when you mention the Florida Fire Prevention Code. Better access to and understanding of the Florida Fire Prevention Code is needed. Fla. Elevator regulations are still difficult to access via DBPR.
- It is a pick and choose of which code works better for your situation.
- There is no coordination between the agencies.
- State energy code is requiring more energy efficient HVAC systems, that are trending towards variable volume systems, but AHCA still requires constant volume systems in many hospital areas. The two agencies are contradictory against each other in this area.
- This code should be incorporated into the FBC so you do not have to search through the hard to use Fl. Fire Prevention code book.
- Fire departments think they are the ones in charge.
- Too much influence in the codes by special interests such as DOE. The building codes have developed "mission creep" with non-building related topics entering into the codes.

- Florida Building Code references compliance with Chapter 11 for ADA, some agencies ignore and Reference federal rules or ADAAG.
- Not being able to interact on those other regulations. When the model code contains language on a specific subject it seems to defer to the other agency rather than making an effort to propose changes to those other regulations for the sake of national uniformity and outside expertise on the subject matter. Also, in many cases the "other" information is not easily available while the FBC and related documents are.
- Too many specialty licenses- general contractor has liability-should have broader scope.
- Still room for improvement. We need to have just one standard for all buildings. No need for every special group with their own "Special" rules.
- From my viewpoint there is no interaction or coordination between state agencies. The Dept of AG, which regulates LP Gas installers, won't even require their installer to comply with the FBC and get permits. They need to be on board with is on permits and inspections. Farm building exemptions - the most abused and misunderstood code section in a rural county. Dept of Ag will often make statements to owners about exemptions that are misunderstood. Our Fire Marshal is overwhelmed with fire and emergency services that fire reviews and inspections take a back seat and understandably.
- There are some conflicts between the codes at times.
- I think the fire prevention code people for single family houses have to be very careful not to make unreasonable and high cost requirements such as fire sprinkler systems.
- There is still a lack of coordination between some agencies resulting in confusion for the end user.
- FEMA DOH have exceptions and give waivers to applicants against the Florida Building Code and then we are with the problem that we can't accept those exceptions and/or variances.
- The other agencies addition of more and possible conflicting codes and issues creates unnecessary burdens on owners and designers.
- There are constant issues and conflicts with DOH and septic tanks, DBPR and DFS regarding fire and elevator requirements. Elevators and the requirements associated with them are one of the commercial contractor's biggest headaches!
- There is more of a problem with the Building Code and NFPA conflicting with each other. NFPA has now become more restrictive than the Building Code.
- Poor up to date coordination.
- Sometimes I have a problem cross referencing research criteria.
- A number of State agencies continue to develop rules dealing with construction as they see fit followed by an attempt to codify the rules with code changes after the fact.
- Code Development and the review process.
- Final inspections of some of the different fields that relate to each other get missed.
- Takes too long to get everyone to agree on the regulations.
- Fire sprinkler design and installation should be under the building code. Most fire inspectors are not qualified to do that work (and I have both licenses). Some stage agencies maintain too much control of specialty regulations (DOH, DOE, elevators).
- Sometimes difficult to determine the applicable edition of related codes.
- Occupancies and separation requirements are still in some disagreement.
- Given good communication, this should not be a problem.
- The code development process and communication to users with the State Fire Marshalls Office process is not as refined as the Building Commission's process.
- I believe there are restrictions placed on some code enhancements. For instance all enforcement agencies should use the same version of an applicable code.
- The system could work better by making sure that all inspections are completed and contractors are advised if additional inspections are required. As an example, a ceiling system should not be approved for

installation until an above ceiling inspection is completed by the building and fire inspector. Neither should give authorization for installation without ensuring the other agencies inspections are complete.

- Conflict avoidance.
- Not timely not entirely up to date poorly coordinated within local jurisdictions with respect to the A&E community. How many code bodies do we have to chase down to get anything reviewed or accomplished. Was this not THE function of the FBC?
- Too many places to have to go and look for the right codes.
- Costs.
- Fire personnel needs to be removed from the review and inspection of vertical construction. The requirements to be able to conduct those reviews and inspections through their licensing program is substandard. There is no requirement for experience in construction. I am certified as a CBO, Plans examiner and inspector through BCAIB and as a fire inspector I and II through the fire certification process. I can tell you that the fire personnel that I have worked with over the past 14 years on the Government enforcement side as well as many years as a contractor, building inspectors understand construction and fire inspectors do not.
- There are still some conflicts between the codes that need to be rectified.
- At times there appears to be conflict.
- There has been a loss of qualified persons at the intake level of the permitting process. The replacements are unaware of the need to coordinate the various code application.
- Some code officials may not be aware of other agency requirements.
- The fact that the Florida Fire Prevention Code and Fire department plan review, inspections, development review is being considered to be removed from the process.
- Biased opinions.
- Too many agencies with their own individual interpretations of the code.
- I do not experience any problems.
- Sometimes we forget about the other agencies and their need to provide input.
- Some conflicts when reading or applying the codes.
- There are minor discrepancies which should be resolved.
- The biggest issue I hear from contractors is that they take an examination on elements of the building code but they are not tested on the elements of the fire codes. Therefore, in their eyes, in their words, they are not expected to have a working knowledge of the fire code requirements. Multiple agency involvements.
- Lack of resources.
- Disconnects between regulation responsibilities.
- Too many goons in the industry.
- Other sections that affect school design are in SREF but not FBC.
- Coordination between ADAAG and building code needs to be improved so that the same standards apply.
- The conflicts between FBC and Fire Prevention Code requirements in some areas.
- We need one code for Buildings not one for fire Marshals and one for us.
- It seems each Fire department head/chief interprets the Florida Fire Prevention Code differently. This just may be inherent to individual interpretation.
- There is still several inconsistencies between the FBC and other state codes. Updates, changes, and adoption schedules are not coordinated well.
- Too many different agencies -- way too many --- Some projects require 4 or 5 different contacts.
- Elevator issues. Elevator door keys not on property.
- I understand the differences needed for certain aspects but there needs to be some more commonalities in a lot of it as well.



- The DOH is over reaching with the health departments trying to inspect things that should be under the building or fire codes. DOH codes are outdated and those trying to enforce them have no licenses or certification as to their qualifications. The Health Dept. should stay out of septic tank installations or inspections all together and leave it to those who have inspector licenses.
- No input from other agencies.
- Better integration with fire codes needed, too many discrepancies.
- There are still areas within the FBC and between the FBC and FFPC that have conflicts. For example, the last sentence of 423.8.1.1 is unclear and may conflict with the requirements of FBC 508.3.2 and FFPC 101-6.1.14.3.2, with specific reference to the means-of-egress minimum corridor widths required by FBC 1017.2 and FFPC 101-14.2.3.2 (educational) versus FFPC 101-38.2.3.2 (business) for non-separated, mixed business and educational occupancies.
- Other code promulgating agencies like DOH, DOE,DFS etc. are non-responsive to code conflict and facilitation issues when they arise.
- Work in progress.
- My main complaint.
- Too much duplication.
- Sometimes hear of conflicts with different agencies and the local authority. Such as an elevator inspector trying to enforce building code requirements.
- The coordination of the issues is done by the same handful of individuals.
- There needs to be more interaction between code development groups for the different regiments to understand how each impacts the other.
- Elevator requirements.
- You forgot FDEP as examples! Potable water and wastewater programs beaches and coastal systems.
- Very little contact with them.
- This is not working well. The other departments tend to feel that they do not have to work with the building departments.
- There are still some "territorial" issues between agencies.
- Coordination needs to continue - we are on the right road.
- There is no interaction or coordination between the different agencies.
- Some agencies require approval from other agencies before they will start their review slowing the permit process.
- Fire and Building Officials are not working together in many areas and there is a territorial problem.
- The Fire Code contradicts the Building Code.
- Lack of coordination with others.
- Do not change nationally adopted codes. For instance the change of fire sprinklers in new single family residences has been deleted.
- Lawyers.
- The FBC system and specifically the FBC itself needs to be coordinated closer with the Florida Fire Prevention Code. Coordination was made originally, however several items between the two codes still need to be addressed.
- The huge volume of agency specific regulations creates difficulties when trying to apply the codes.
- We, as organizations and codes enforcers, must work together with common sense and a good base when applying codes with our customers. We should take classes together, train together and work for that common goal.
- DOH has little interaction with local building departments. AHCA and DBPR review process is arduous and lengthy compared to building department approvals delaying approvals for smaller businesses.
- The DOH kingdom should become a village, especially the septic tank division. If we really want to be efficient, sensitive to cost, and not over regulate. Septic Tank enforcement should be put under local

#### Building Departments.

- There are still a few conflicts between the FBC and the FFPC. The FBC revision cycle is much slower than the FFPC revision cycle. It makes it hard to keep up with the current changes to codes. I think it could be as many as 6 years behind.
- FBC Table 508.3.3 and Life Safety Code 101 Table 6.1.14.4.1 are not coordinated.
- Fire and Building interpret things differently.
- There is inadequate coordination and understanding of the differences in the needs.
- No support from worker comp compliance.
- We need to agree not to disagree (I'M getting tired).
- A cross reference, indicated on the page, would be helpful.
- By having these two greatly different codes and requirements is costing the taxpayer more money than it should due to no coordination happening between these two codes.
- Again, lack of consistency between the FBC and FFPC.
- Still not enough consistency between the entities and authority is not clear.
- Very poor.
- As a licensed Architect, I think FL's building code inspection provision under Chapter 468 seems to create a licensing jurisdiction contrary to the provisions of Chapters 471 and 481. Many states do not allow non-licensed Architects and Engineers to assume the job of Plans Review and Inspection in each respective Construction Division. Of the FL State Agencies that enforce this professional licensing requirement, only AHCA seems to differ.
- The county or city needs someone to shepherd projects through the regulatory maze so everyone is clear about requirements. You need a master sign off sheet that defines who needs to sign off on each phase of a development.
- While great improvements have been made, this needs to continue to improve.
- It is very difficult to maneuver between the codes. You are referenced back and forth such that you begin to get confused. Also, in some cases, there are conflicts between the codes and you are not sure which takes precedent.
- Conflicts between the philosophy and approach used by NFPA vs. ICC.
- When the FBC seem to think that is the only code needed there is not a balance. There are two minimum codes that need to be address.
- Fire and building officials still stake out their turf and job protection.
- Contractor not understanding that there are more than one Code concerning facility compliance. Just because one Code does not address and issue doesn't always make something legal.
- In our area, school fire inspectors are constantly bucking local fire inspectors. Again, they are often involved with other responsibilities that are not related to fire inspections, and they do not know the codes as well as those who spend all their time in these areas. Or they are afraid that if they say something is wrong and it is going to cost a lot of money, they are going to lose their jobs because they buck their bosses. They are often told no when something needs to be fixed or is not right. How is that good for our children?
- There are some who would prefer to remove the fire officials from the plans review process. This concept needs to be rethought. Constructing safe buildings should not only be a priority for the fire officials, but for all of those involved in the plans review and construction process. Nothing is more important than life safety.
- Lack of coordination
- FAC's are not up to date with current FBC and FFPC. This often causes conflicts as design professionals and contractors are not familiar with FAC differences
- DOH is so underfunded that often septic tank permit review slows building permit issuance.
- Some agencies still write building construction regulations into their rules in violation of the legislative

mandate.

- Elevator and AHCA seem to be very random during the inspection process. It's next to impossible to get a consistent answer on an elevator issue.

### **3. Respondents specific recommendations to enhance the interaction and coordination between the Florida Building Code and other state agency building construction regulations.**

- Legislature should clearly define agency roles. Construction oversight is too fragmented.
- There should be only ONE code and one enforcement agency rather than the current multi-code / multi-agency process. Center the code in one agency and get rid of the others.
- Possibly start a TAC group consisting of these other agencies and users.
- Encourage agencies to think about who they are serving and why they have jobs...convince each agency to understand they are part of one great state all with one mission to serve our citizens...I believe DOH is a little full of themselves...rest seem to cooperate well.
- If its covered by the IBC do not try to reinvent the wheel and do not supplement.
- Make sure which to follow and try to make one the ultimate answer. in my opinion there is too much duplication, which also results in disputes between the agency rules.
- Move toward a Federal/National standard. Why should Florida be different from other states?
- Have the legislatively adapted statutes overhauled for new coordinating language.
- Bring building and structure fire safety requirements and enforcement under the building official.
- Conflicts and differences between definitions and interpretations needs to be better coordinated and addressed.
- Get the word out that there is a coordinated effort to put all code info at a user's fingertips instead of it being a disconnected system where the user has to fish around different agencies to get info on septic tanks, pools, etc.
- Get Fire Marshals to take classes in Building Construction and Design.
- Clarify who does what and when, a roadmap of process.
- Provide a direct link to Fla. Elevator regulations via DBPR in the electronic version of the online code.
- One code.
- You will not be able to get all these organizations to work together as there is too much of a power struggle amongst them.
- More cross references.
- Combine the FBC and FFPC into one code book for items that effect construction.
- Keep up the good work.
- A sunset provision for Florida specific code changes every three years would greatly help limit the building codes to building topics.
- Incorporate language that states the Building Code is the code to use.
- Include the other regulations into the bound copy of the FBC (et al) as applicable so that all the construction related items are included.
- One Code one rule.
- Dept of Ag needs to educate their LP license holders about getting about permits and inspections.
- Dept of Ag should identify and issue an exemption if a proposed building or structure is exempt as a farm building, otherwise it requires a permit.
- Fire reviews and inspections should be turned over to the Building Officials. Fire Marshals should be responsible for existing buildings and after the CO is issued. There is different mind set in construction enforcement and emergency services and when we mix the two we burden our emergency service people when they should be concentrating on emergency services and security issues - in our modern world.
- DBPR - We are the only regulators regulated by regulators. Our relationships, as building officials, should

be better with DBPR.

- Eliminate all of the duplicity. Have each and every building constructed in a given area, overseen by the local agency's building departments and eliminate other agency's building department involvements; such as DOE, ACHA, DOH, DBPR, etc. It's unnecessary and makes only for confusion.
- Eliminate the conflicts between the codes.
- Drop arc fault circuit breakers for all rooms other than the bedroom.
- A central point of electronic coordination such as a link on the DOS or the BCIS and a requirement that any agency initiating a change to rules which affect the built environment must report the intent to change rules to that link. It requires no human intervention while providing a single location to obtain potential code conflicts between agencies. The rule chapters could be listed in advance so agencies know if they intend to change any listed rule, they must provide a notice to this link. The notice stays live until the rule is adopted or withdrawn or it can be set to automatically delete itself after a set time such as 120 days.
- FEMA regulations should be fully include in the code and enforced in its full for Building Code certify Personnel. DOH: Regulations should be the same and DOH should not grant variances that don't comply with FBC.
- It would be nice to get some correlation done in these groups and what they require which I realize is almost impossible.
- Make the code requirements the same at all levels. It will reduce some book sales, but that should not be a reason for writing codes.
- More up to date coordination, there should never be a code amendment due to poor intra code/regulatory coordination or timing.
- Need better communication between State Agencies and the Commission.
- Take them out of the brick and sticks process.
- Increased training on all sides of the industry. It is not one is better than the other, it is that each one is looking at it from a different viewpoint. Conflicts will always be present. As long as the goal is to provide a safe environment, the conflicts between the various codes can be resolved.
- Find that contractors and engineers try to write the code on the fly and the local provisions provide a problem with their efforts.
- Take state agencies out of code enforcement.
- Educate building officials and their respective staff on SREF requirements.
- Maintain conduit of communication between agencies and their codes thereof. Understand and respect that the most stringent application applies no matter the building or fire code. This is not about whose code is better but what model code application will benefit the overall safety and stability of the building?
- Provide a single shared point of entry and access for building code and fire prevention code changes, DEC statement and tracking. Maintain the IBC and NFPA 1/101 as the base fire and building codes in the state.
- Encourage the legislature to ensure that code version consistency is considered when changing code versions for different enforcing agencies.
- Cross-Reference ALL "code authorities" on the DCA website The DCA website must have a function as the "code library" containing ALL building codes, state standards, fire protection codes, including ALL referenced standards, ASTM standards, NFPA standards, etc, necessary to be available for reference and searched. I am willing to bet that very few organization have it all. How enforceable is a "building code" when ALL relevant codes and standards are not available for use?
- Merge these codes into the base code document so the contractors, engineers and code reviewers do not have to go and find these codes. Or do away with the special codes.
- Cost considerations.
- Eliminate the fire services from plan review and inspections for vertical construction. This will stream

line processes and should create a CST savings for government that can be passed along to the consumer.

- Continue to work together to strengthen the codes to remove conflicts and help each organization do a better job.
- More education that specifically spells out other agency requirements.
- Do not remove the fire department process that is already in place.
- TRAINING, for both the fire and building officials and trades.
- Keep the Fire Department, plans reviewer, inspections and development review committee in the loop and the Florida Fire Prevention Code.
- Educate CBO's that they need to work with others and that the Florida Building Code is not the be all/end all in the code world.
- Stay close to the fire service and its personnel
- Clarify roles of the different agencies. Who can review and inspect what.
- Mutual training programs.
- More communication.
- We just need to meet and work toward better code.
- All codes regardless of where they are should not conflict with any other code without distinct explanation..
- More coordinated training..
- As the inclusion of the fire codes is also by reference through the building codes, include the fire code requirements in the licensing testing.
- Enhancing local, regional, and statewide coordination efforts between the CBO, Code Compliance, and Fire Marshal Fire Prevention Bureau.
- A class or training on the roles of the building and fire officials, responsibilities and how this process should take place concerning plan review and new construction inspections.
- Simplify.
- Representatives from each group meet to work out the gaps.
- Get rid of some of the layers of bureaucracies.
- Get consensus between fire and building on the subject of occupancy definition related to education and assembly. Specifically elementary school media center, cafeteria, music, and art classrooms. Also middle school small assembly spaces such as weight rooms in gymnasiums.
- Maintain a good working relationship with both entities of building and fire for life safety.
- Continue to work toward getting the codes to agree over time.
- None really, I've been pretty happy with it.
- All codes needs to be updated and adopted at the same time and be coordinated for consistency.
- Create a single "clearing house".
- Elevator issues need to be reviewed.
- The DOH should only deal with public health threats that are real not contrived by health department employees that are trying to generate revenue.
- The Commission should recommend statutory changes that compel the DOE, which seems unwilling to acknowledge that differences and conflicts exist in its Section 423, and to update and clarify this section to be consistent with other parts of the FBC and with FFPC.
- There should be only one agency with the authority to exercise control over the code requirements for construction in the State of Florida.
- Training – meetings.
- Consensus.
- Better education involving building and fire inspectors to get everyone on the same page.
- A better understanding between the different agencies and their roles and responsibilities.

- Paid staff to coordinate such efforts of adoption of single agency codes for building and fire prevention.
- Continue to work together, Florida Building Code and Fire Prevention Code officials, to make buildings safe. DO NOT remove the fire service from building permits and COs since we have important requirements in the fire code that must be addressed and the buildings as existing buildings become the responsibility of the fire marshal and not the building official.
- Put the elevator code in the building code.
- FDEP B&CS folk are assigned as liaison to FBC, but, my experience is FBC does not push them to be involved enough.
- Have training which includes all parties that enforce the codes at the same time.
- Aside from eliminating the other agencies, I don't think much else can be done....continue to coordinate as much as possible.
- Provide a funding source for fire officials.
- Give the whole lot to ICC. One agency, one set of books, one Building Official, one chance to get it right. Find a system and trust it. Why does a restaurant have only one chef? Let's start cooking Florida.
- Establish joint training for both fire and building officials.
- Have the Fire and Building codes meet the same requirements.
- More coordination with city ordinances, NFPA, FFPC etc.
- Put the responsibility under one agency. Better coordination.
- It would be enhanced if the Florida fire prevention code and Florida building carried the regulations and the outdated regulations were removed from the statutes.
- Provide a more precise coordination between the FBC and the FFPC.
- Eliminate agency specific modifications to the codes and standards. Utilize the same year base documents for all agencies.
- Require building departments to consider building code review and other agencies to occur at the same time.
- The DOH kingdom should become a village, especially the septic tank division. If we really want to be efficient, sensitive to cost, and not over regulate. Septic Tank enforcement should be put under Local Building Departments.
- More communication.
- Only make those changes that are unique to Florida and leave the other things along. When there are not conflicts between the model codes, do not make changes to those provisions.
- If other agencies differ from the FBC then provide that reference.
- Have fire as a part of the building department. Most permit delays come from fire and zoning. The actual building departments plan review turnaround is pretty good.
- Better coordination of the agencies with an emphasis on consistency of not only the technical issues but the timing of the adoptions of standards.
- Funding should be made available, so you can get assistance when needed.
- Continue working in the same manner with more emphasis on the relation with the Fire Codes.
- The more information provided the better the product.
- The State of Florida adopt the ICC Fire Prevention Code and the State Fire Marshal Office then insert their Florida specific language as the Florida Building Code does.
- Clearer lines of authority to be established and enforced.
- State should produce a reference resource outlined and placing all relevant materials together. Now an administrator has to be made aware and know where to look. Look at the BOAF discussion group, continually asking each other where something is referenced in all these documents.
- I think it is only fair that Plans Reviewers working for State and Local Agencies should be licensed as Architects and Engineers to qualify for Building Plans Review and Inspection jobs. Architects and Engineers after all, are the ones assuming the liability for their designs when they are required by state

statutes to sign and seal their construction documents.

- As review officials to report discrepancies that they come across.
- Coordination and elimination or standardization of criteria among all codes is imperative. Every effort should be made to coordinate all codes, eliminate redundancies and conflicts or just use the national standard references and leave it alone.
- More coordination between the entities when writing the codes so that contradictions are minimized.
- A one stop shop. Have access to the people involved. Have training for all. While they are different codes and should be that way, the customer should be able to have access to everyone so they will know how to work with all involved.
- Combine reviewers to a single reviewer and save tax payer money. Forget turf wars.
- Provide better information and education to the contractors as to the Code.
- Leave inspections of schools to local inspectors who, although have the same certification as the school inspectors, is more qualified and educated since they are not required to also be safety specialists worrying about how much soft material is required under the swing set or what cleaning materials are "green" for the environment.
- Continue to work to resolve any differences between the Florida Building Code, and the Florida Fire Prevention Code. While maybe having a greater number of shared training experiences that all could participate in.
- Building and fire officials should work together, and should both be a part of the plans review process.
- Talk to each other. Place the public good above ego & empire building.
- Update FAC's with current FBC and FFPC.
- An accurate website of what properties are on septic tanks would be extremely helpful. State review of public school buildings should be maintained, as undue pressure to open schools can be brought to bear on local building departments. State review of healthcare facilities (AHCA) and swimming pools and septic tanks (DOH) should be maintained, as they are too important and technical to completely leave to local building departments, especially smaller ones. DFS is an important resource to local building departments, particularly in reviewing and inspecting hazardous materials.
- Uniform state standards are easier to maintain by maintaining these agencies.
- State agencies need a process to submit code change proposals to the commission.
- Establish better communication between entities through mass emails, websites, and document/procedures sharing.

**XVI. ENFORCEMENT OF OTHER STATE BASED BUILDING CONSTRUCTION REGULATIONS AT THE LOCAL LEVEL**

(Examples: DFS: Florida Fire Prevention Code; DOH: septic tank regulations; DOH: swimming pools; AHCA: healthcare facilities; DOE: public schools; DBPR: elevators)

**How well is the local enforcement of other state agency building construction regulations functioning?**

Ranking Scale	5	4	3	2	1	Average
Total	48	68	104	32	25	3.3

**1. What is working well with the local enforcement of other state agency building construction regulations.**

- AHCA is the flagship example of an agency staffed with very competent professionals who are technically proficient and experienced. Every building department in the state should function as

effectively and cooperatively as they do. This is not to be read that AHCA is a soft touch - anything but. However, they are knowledgeable professionals who work with people.

- DBPR has stepped up some enforcement in our area using stings on unlicensed activity.
- Seems like generally things work well.
- Coordination is virtually nonexistent.
- The inspectors seem to do an adequate job.
- I have little personal experience on this matter.
- We have good people, but they do not always have a building code background that would aid in their decisions.
- All of the departments enforce the regulations.
- I think the DOH gets the highest grade for Code compliance. It seems most people are concerned about effluent flowing on the ground and damaging the environment. AHCA should also get high marks for compliance because the Architects and Engineers reviewing documents are professionals and, I believe, uphold the ethics and requirements for compliance with laws and Codes because so much is riding on what they approve or reject.
- Presence in area.
- Very little with the exception of the DOH.
- Some do their job and others don't.
- Everything except elevators.
- Coordination with our local Fire Official and the State Fire Marshals Office. We don't enforce AHCA, septic tanks, elevators or public schools. State agencies do that and we have good working relationships.
- Good coordination between the TAC members and other agencies.
- In some cases the differing agencies cooperate and work well together, sitting and meeting together on a given project.
- Local Health Department, Local DBPR Office, and Local Fire Marshal.
- Working together to resolve issues, when differences in the code arise.
- Unified rules for enforcement.
- We have reviewers that are familiar with the regulations.
- Most people do their jobs - some don't.
- Has not been an issue for me so far.
- Not much.
- The inter-relation between them.
- Enforce codes as written.
- Have no problems with enforcing the local and state codes.
- The coordination with Fire Prevention works relatively smoothly, with some notable exceptions in overlap areas.
- Ability to have building code officials directly responsible to the school districts is a plus for education. Most building departments do not have the knowledge of school design/permitting /construction in associations with SREF.
- Effective Communication across the board.
- For the most part, cooperation is very good between building officials and fire officials.
- Those persons charged with enforcement are well trained and knowledgeable.
- Most codes are enforced in our jurisdiction.
- Not working.
- All of it.
- Everything except fire services seems to have been improved.
- Some better working relationships between all parties.
- It works.



- We all are on the same page for the most part.
- If the plan reviewers and code officials are aware of the requirements then they are enforced.
- Works fairly well, many gray areas.
- The avenue is in place for these codes to interact.
- Communication and a desire to include other departments in the review and inspection process.
- Most areas seem to have good working relationships between building and fire officials.
- Very good effort on both building officials and fire officials.
- Here in Pinellas County Building, Fire and State Agencies seem to have or found a means of working together.
- Knowledge by the building official of codes.
- Very Well cooperation is great.
- I see the fire code side of the house applied consistently throughout the state.
- The public school system and the Florida Fire Code have worked great.
- Both the Building and Fire officials in our county work well together enforcing the codes.
- The Florida Fire Prevention Code is enforced per the code. It must always be stressed that the code is the minimum, therefore we must comply to it.
- Online information.
- Limitation of Fire Code to Non-residential and 3 or more residential applications.
- Not one damn thing.
- Important sections of SREF are in the building code.
- They are trying to do this.
- I think permit reviews of the plans are pretty decent.
- Access to education, training, and information of other state based codes is good.
- DOH or local health depts. are just looking to generate revenue because of shortfalls in tax dollars.
- There is better communication and cooperation among the various state agencies, which has resulted in improved consistency in their respective codes and standards.
- Building code enforcement with public school board
- This is work in progress.
- Depends on the jurisdiction.
- We have little to no dealings with the agencies listed above.
- Very little.
- The Fire Department inspectors have some knowledge of construction regulations from the Fire Plans Reviewer so that in the field they can note and report any construction problems to the building department.
- The Building Dept and Fire Prevention offices work very well together in my City.
- Excellent.
- Any of the authorities listed above can prevent completion of a project.
- The other state agencies seem to enforce their codes well.
- Local officials are at least aware of the other agencies, in most cases, but do not feel compelled to require compliance themselves.
- Compared to 1970 - a 1,000% improvement. Best in the nation.
- In my jurisdiction it is working fine.
- In jurisdictions where the Building and Fire Officials work together it works well, but where this does not occur there are problems with disjointed enforcement. territorial disputes, etc,
- I am not familiar with the enforcement of other state agency BC regulations.
- Allows more specific enforcement of respective agency requirements.
- Not all Counties and AHJ's enforce all the codes.
- DOH, fire and building all work fairly well together.

- The general coordination is functioning well at this time.
- Information is sufficient, especially swimming pools.
- For the most part, we all work well together.
- Best thing the state has done in years is require most of its agencies to permit there buildings and structures through local Building Departments.
- The codes I deal with, FFPC and adopted NFPA standards, are straight forward and proven. Once we educate people on the code requirement, compliance follows.
- No problems.
- Enforcement of the FFPC and the FBC work well on the local level.
- I have had good success partnering with state licensing agencies when I have had code violations in occupancies that they license. This has assisted in getting a quick turn around on correcting issues.
- We have always tried to coordinate efforts.
- Everything seems to be working well, only complaint I have is the time it takes certain agencies in their review process.
- Florida has a Building and a Fire Prevention Code.
- Centralized plan review and application of the Fire Codes.
- It is very important and essential that fire service agencies remain stakeholders with regards to both new and existing buildings. Fire service agencies work with designers, architects, business-owners, and the like to insure a FL Fire Prevention code compliant occupancy to insure occupant safety, firefighter safety, and property conservation. By insuring fire department involvement, business and building owners and firefighters are appropriately represented at the table by the local fire prevention officer. As a general contractor may work with a fire marshal over a course of days, weeks, and/or months - they will eventually move on. Business owners and buildings owners stay for years; as does the fire department. It is because of this, the fire department must be present within the new building phase of a project to insure the project meets fire code compliance and that the business / building owner understand such compliance. This in turn will lead to compliance when the occupancy becomes an existing occupancy.
- Other state agencies tend to be rude and uncooperative. I can't say that I have anything good to say about them working well with the exception of the DFS and DOE, which are responsive and easy to talk with.
- In general, coordinating with other agencies is pretty good, but it does vary from jurisdiction to jurisdiction.
- Allows separation of jurisdiction.
- Not enough coordination.
- Coordination and cooperation between agencies has improved. Having uniform access to all of the requirements has helped this process.
- All code enforcement officers within the community I live try and work with each other. This provided additional eyes so that the minimum codes are intact.
- Education program.
- Again, I can't speak to the DOH, AHCA tends work in conjunction with local inspectors, but schools - they do not.
- The fact that the Florida Fire Prevention Code is enforced by local Fire officials and inspectors continues to be the best way to provide both safety of the new buildings, and good information to those who need it.
- Along with the building code administration of a project, the Florida Fire Prevention Code is incorporated into the review and inspection process.
- Local building departments do not enforce other state agency requirements.
- Same issues as above. --Allen Johnson, Building Official
- Enforcement of the FFPC is generally very good.

- The enforcement of the FFPC and local codes allows our jurisdiction to maintain a #1 ISO rating which is passed down to building owners by reducing insurance rates. During fire plans review, updated building information is inputted into the Fire Records Management system to ensure that the responding personnel have accurate information for each property.

## **2. What is not working well with the local enforcement of other state agency building construction regulations.**

- Local fire marshals are often at odds with the building department due to dual code and dual enforcement authority conflicts or perceptions of conflicts.
- Financial cuts have caused reductions in enforcement staffing.
- The agency that need improvement in response is FDOT, DEP and SWFWMD.
- In economic times such as these, the level of illegal activity is high and they are simply not being stopped. I feel that enforcement is not aggressive enough.
- Give us one online location where ALL of these related, ancillary codes can be found. I would love to comply with all of these other codes but just finding them is the hardest part of the process; and the most time consuming. Or, just post a list of links to these related codes on the FBC website.
- Conflicts between the two codes.
- Sometimes the fire department asks for things not in the code and you either slow up the job to argue or just pay extra for something that is not needed.
- Since the responsibility for administration of the Code for DOE has been transferred to the local Building Departments, I feel compliance has taken a nose dive. Not from Architects, Engineers and Contractors who provide services to the Boards but by the Boards themselves. The prevailing attitude seems to be "what they don't know won't hurt anyone".
- Local understanding and enforcement. Knowledge of the regulations is primary
- Too much to do.
- Too many different codes to be able to enforce properly.
- Have everyone do what they are supposed to do.
- Elevators.
- Any thing energy (DOE)related seems to get great attention at the commission level. Great reasoning, research, etc. but very little trickles down to enforcement.
- In other cases the agencies do not work together or make much of an effort to cooperate resulting in endless hours spent tracking down different individuals for resolution to issues.
- DCA DBPR - FS 468 Licensing FBC BCAIB I find the relationship with these agencies frustrating and bureaucratic.
- Conflicts in the codes.
- I do not know where to find elevator requirements for churches or single family homes.
- Individual enforcement agencies are still having turf battles which then spill over into state agency actions - time consuming.
- Training and awareness.
- The other agencies addition of more and possible conflicting codes and issues creates unnecessary burdens on owners and designers.
- Again its an education situation.
- Local code enforcement rarely functions as an adequate conduit to other agencies. Furthermore finding the right people at other agencies to troubleshoot a project is neither easy or transparent.
- Very long process and no accountability.
- The coordination with the local DOH and their interpretation of the extent of their authority has been a significant issue in recent years.

- Local Fire Marshal need to be educated on school based design/permitting and construction requirements.
- Unclear as to who is the AHJ for related codes, especially the FFPC.
- Egos can get in the way instead of applied common sense in which code serves the better purpose.
- The Fire Official training program has not been expanded in the last 25+ years to keep up with the increased competency expectations. Unlike the Building side, there is no specific license for fire plans examiner or Fire Code Administrator. The basic entry level competencies for fire inspector are way below that of building inspector. Significant improvements need to be made in this area. These improvements will provide better customer service, responsible and accountable fire officials. The SFMO and BCAIB need to implement the reciprocity agreement between BCAIB and the SFMO for CEUS. This will encourage fire and building officials to conduct joint training.
- Lack of consistency as to what version of code is adopted for each enforcement agency.
- I don't think the Florida Building Code is properly enforced in our Jurisdiction.
- Local building offices tend to not want anything to do with other agencies. Projects seem to be shipped off to die.
- Local officials are stuck with the interpretation of these codes and get no help the State agency with the interpretation or enforcement. (DBPR).
- It's all ok.
- Fire personnel continue to attempt to make it look like they need to be involved with plan review and inspections when in fact this function could be better performed with greater efficiency and effectiveness by Building Departments. Building personnel understand construction, for personnel do not.
- Still need to allow the Fire Officials have the capability to stop projects and issue Stop Work orders if serious violations do exist.
- Sometimes we have conflict between the different codes.
- The lack of knowledge of plan reviewers, inspectors and code officials of the requirements of different agencies.
- Communication. It is difficult to know who to make contact with for a certain problem.
- Too often one code overrides the requirements of the other.
- Possible elimination of fire service input.
- Just too many regulations.
- The combined effort results in safer communities.
- The interpretations and requirements of the fire codes are not emphasized through education and testing for construction trade licensing.
- Eliminate duplicity.
- Get rid of elevator inspectors and fire inspectors.
- Some jurisdictions want to go above and beyond the code. I am a firm believer that we all need to enforce the Florida Fire Prevention Code and not go above it.
- Lack of resources.
- Great proliferation of red tape, insanity, and public distrust of government.
- Other sections that affect school design are in SREF but not FBC, several conflict with FBC and FFPC.
- DOH is using unrealistic data for additions on existing residential buildings. Putting the public to excessive cost for additions and sheds in ones yard.
- Some building departments or school board building officials do a better job than others. I find some entities seriously lacking on inspections and job site supervision.
- Wide-spread knowledge and training on other state based codes is not evident.
- First off there is not enough funding to adequately enforce most of the rules and regulations in our area. Certain agencies seem to think that only their rules should apply, which may go back to training, but we all must have input and work together and met the intent of what is being put out.

- There still is some inconsistency and conflicts among the various agencies, including from one fire department to another. These seem to be mostly due to different interpretations of the various codes.
- Work in progress.
- Too confusing as to jurisdiction.
- No communication between agencies.
- It is a mess.
- I feel DOE should eliminate any cross reference between SREF and the building code. Duplication leads to confusion if there is any difference between the two.
- There are too many agencies involved.
- Coordination with the building departments when inspections take place.
- Not enough inter-agency support and interaction.
- Need to keep politics out of code enforcement.
- Contradictions between Fire and Building.
- Needs to have more coordination between these agencies.
- ALF regulations vs. fire codes vs. building codes.
- When different agencies have codes and standards that are different than the state base codes or have codes that are not the same year it creates problems with keeping up with what changes they make and enforcement. This becomes much more of an issue when dealing with contractors who provide services to these agencies.
- All School Boards are different in each county. You can either work well with them or you can be cut out of any process when they are working on plans. Not consistent.
- There is still a lot of state enforcement that could be turned over to local Building Departments. Septic Tanks being one.
- Health care facilities may pass inspections based on the FBC only to be given a long list of deficiencies by AHCA.
- Lack of communication in some instances. Lack of understanding of some requirements.
- Local school districts seem to be allowed free pass when it comes to enforcement of the FBC.
- I already talked about it above.
- Local code officials and fire officials have two entirely different codes to contend with and try to determine which is the strictest.
- Consistency among fire inspectors and among the various fire districts in Collier County.
- It does not work well when ideas are developed to remove the fire service from new and/or existing building/occupancy projects. The US fire problem remains and is a terrible epidemic. By removing the influence of the fire service, fire professionals will not be able to insure fire codes are enforced or adhered to. Therefore, as fire prevention involvement diminishes - fire suppression involvement will increase, perhaps causing the need to hire additional "reactive" based fire department personnel.
- It is further possible that if the fire service is removed from being involved with new and/or existing occupancies that property loss due to fire will increase, as well as injury and death.
- As a licensed Architect, I think FL's building code inspection provision under Chapter 468 seems to create a licensing jurisdiction contrary to the provisions of Chapters 471 and 481. Many states do not allow non-licensed Architects and Engineers to assume the job of Plans Review and Inspection in each respective Construction Division. Of the FL State Agencies that enforce this professional licensing requirement, only AHCA seems to differ.
- Too many unqualified inspectors. Architects and Engineers are spending more time in the field doing administration work due to decline in trades, and overall level of quality on job site. Inspectors see themselves as taxation agents rather than a policing agency.
- Lack of communication and poor customer relations with the exception of DFS and DOE.
- No one knows what each department does.

- The 2007 FBC does not require elevators to be installed in apartment buildings unless they are over 75 ft. The reason is because they are not subject to Chapter 11, only Fair Housing. The Department of Elevator Safety has told me that elevators are required if over 3 stories by statute, however the statute is under the heading of "accessibility". Building departments have no way to require an elevator nor a method to send them to Department of Elevator Safety.
- Too many turf wars. Many agencies still have the attitude that "these are regulations" and do not try to coordinate. A common area to present issues and problems would be a big help.
- Sometime one agency is blind and not willing to enforce the minimum codes.
- State does not nor understands how to monitor properly. Many school boards review documents with non-qualified staff or do not even have a School Board Architect for their county. AHCA is a burdensome anchor from the past with a government within themselves of rule making to keep jobs. Other states have safe buildings without these specific rules and regulations of Florida.
- Enforcement process.
- School autonomy. The fox guarding the hen house.
- To change the local enforcement procedures to something different from what they are now could cause safety and response problems for local fire departments and building departments.
- State agencies need to use the Florida Building Code to enforce their issues.
- DOE, AHCA and Elevator enforcement is a joke as far as consistency.

### **3. Respondents specific recommendations to enhance the local enforcement of other state agency building construction regulations.**

- A single uniform, stable code that is scientifically based along with a single enforcement entity.
- Get it under one jurisdiction.
- Obviously I have a lack of enthusiasm for the present System that has evolved in Florida. The Florida building Code was given to us in great part because of the damage caused by Andrew many years ago. We were aghast that such damage could happen in the area of our state with the "most stringent" codes, and coincidentally the most corrupt enforcement. The code never was the problem. Enforcement was, but to have admitted that would have been to admit that the proud Dade County system was broken. Some years later, all too late we found that it was broken. The evidence was at hand at the time. Even a cursory glance at the damage from Andrew showed remarkable similarity to that from Hugo just a few years earlier in South Carolina. The Hugo damage was rationally placed at the feet of our industry in neither designing to, constructing by, or enforcing the code as it was written. The solution template for that was an intensive campaign to educate our industry as to what that old, insufficient but stable code actually said and meant. It was working, and then we in Florida encountered Andrew and were too willing to enhance regulation over enforcement. Given all of our new and improved rules we will simply pass more with each passing storm, becoming bigger and bigger victims of the law of diminishing returns. Oh, the folly of our egos.
- Continue efforts to unify Fire Marshal and Building Code requirements .
- Do not ask for things that are not in the code because they want it. Just enforce the code.
- The General Public has no idea of what has been happening to the Building Codes in Florida unless they try to build something themselves. Those in the industry who have dealt with it for years know the intent of the Codes and the benefit of Code compliance. Unfortunately, when things get too expensive or too cumbersome, people will circumvent them altogether and the intent will also be circumvented. Education is good but when things keep changing so much, what was learned yesterday is not good today, it's confusing.
- Educate the local code administrators.
- Simplified regulations to reduce workload.

- One code.
- Education and training.
- Provide a section in the FBC that states exactly what and what cannot be done with elevators for both residential and commercial installations so the building official and design professional can make sure the projects are completed and move forward in a more timely and less mumbo jumbo order than what now is the method employed, with every project getting a different inspector with different ideas on how they should be installed. The present system is awful.
- Require energy compliance to be done via prescriptive path or tighten up the stringency of the performance based approach (verification that components are actually what was calculated).
- The Office of the State Building Official –it’s time.
- Eliminate conflicts in the codes.
- A method to search on the internet for these specific requirements.
- Training on the interrelationships of codes that is taught by legal experts.
- Agencies should give all local government code enforcement personal training.
- More cooperation and greater transparency quite frankly, I am tired of chasing down various "building" department and regulators to move a project forward or secure approvals.
- Take them out of the building process and plans approval process.
- Increased training on all sides of the coin. Promote more customer service skills, policies, and procedures. It is nice to have other eyes looking at the eyes instead of only one pair of eyes. We are all human and will miss things from time to time. This is what makes the process better.
- A clearly defined crosswalk of agency versus authority would be beneficial.
- Education.
- Park the egos. Park the power plays. Come to a conclusion as to what code works better. Apply the most stringent application. Understand how each model code works. Effective communication and relationships are a must for a successful outcome to the customer.
- Revise the Fire Inspector certification program to include: 1. Improved quality and quantity of initial fire inspector certification. 2. Include a field component for initial fire inspector certification. 3. Create a mandatory Fire Plans Examiner certification. 4. Create a mandatory Fire Code Administrator certification. Move the fire inspector certification programs to a licensing program from certification program in order to provide greater accountability to the State Fire Marshall’s Office by local inspectors. The State Fire Marshall’s Office needs to implement the rule making authority it is currently granted for greater accountability of fire safety inspectors to the SFMO. The SFMO and BCAIB need to implement the reciprocity agreement between BCAIB and the SFMO for CEUS.
- Try to maintain consistency of adopted code versions for all enforcement agencies.
- A tighter, more coordinated and transparent plans review community.
- Let them enforce their own codes or do away with them and make them follow the base codes for Fire and Building.
- Eliminate the statutory requirement for fire plan review and inspections.
- Stop facilities from occupying the structure till ALL inspections and releases have been obtained utilizing a system to ensure compliance has been met PRIOR to putting the public in harm’s way.
- Work a little closer with each other.
- More education as to what agencies and requirements may be needed for specific types of permits.
- Streamline a contact list of individuals in each jurisdiction.
- Have a code governing group that marries all applicable codes under one roof.
- continue to work closely with experienced fire service personnel.
- Again, lets (Fl. Building Commission / State Fire Marshals) find a way to better educate each other. This is a very good start. I can be contacted at firemarshal@stpetebeach.org.
- Make the codes the same in all areas.

- Include fire code training elements in continuing education programs and in initial licensing examinations.
- Eliminate duplicity.
- Keep an open line of communication between agencies.
- Simplify.
- Get rid of the goons in government.
- Get consensus between fire and building on the subject of occupancy definition related to education and assembly. Specifically elementary school media center, cafeteria, music, and art classrooms. Also middle school small assembly spaces such as weight rooms in gymnasiums. Get a ruling on whether an elementary school is a mixed occupancy or a separated occupancy.
- To the point that you find that hardly anyone on the jobsites understands what they are doing. Loose inspections by government entities has allowed the lowest common denominator subcontractors to grow while those who try to do things better are priced out of the work. Stronger across the board inspections would improve quality of construction more than any code provisions will. I also would recommend laws passed that allow the entity performing inspections to fine the G.C. if too many re-inspections are required. That way contractors would have incentive to inspect the work first before calling for the government inspector. Better trained inspectors for structural work is also recommended along with more of them so that they aren't stretched too thin. On top of everything I find that the better inspectors sometimes are let go because they were in fact doing their job well. We need better inspections not more frequent code cycles.
- Incorporate other state based codes into local education and training.
- More joint training and cooperation.
- This very survey is so long and complicated - it validates every feeling that I have expressed about the Code. Congratulations!
- The Commission should recommend statutory changes that compel the Fire Marshal's Office and the other related agencies to work more cooperatively with one another and identify differences and conflicts in their codes in order to be more consistent.
- Enforcement with public school board
- Training – meetings.
- Consensus.
- Joint education programs.
- Provide more training for all inspectors.
- All applicable Building Construction regulations need to be under one authority.
- Require that both departments be present for inspections.
- Need better training - a training fund for the fire service as what exists for the building official is needed.
- Educate the fire and building officials on the purpose and function of each code.
- Establish joint training between both Building and Fire Officials.
- Have the Fire and Building codes meet the same requirements.
- State agencies should also work to coordinate requirements that may be in conflict with one another and also work closer together on related requirements.
- Just make the statutes, fire codes and building codes agree!
- Eliminate the different rules, codes, and standards that are inconsistent with the Florida Building Code and Florida Fire Prevention Code. If an agency wants to have a modification to the adopted standards then they should submit the modifications to the appropriate committees. This would greatly reduce the number of regulations and provide for better enforcement of the code.
- Adopt The ICC Code.
- Need to adopt the ICC code.
- Make it "shall".



- Septic Tank enforcement should be put under local Building Departments.
- Local enforcement may not be able to enforce other agency regulations but it would be helpful to the Permit Applicant to be made aware of other agency requirements at the time of permitting. Therefore, provide information to local building departments from State Agencies on what they look for during their inspection and a list of the most common deficiencies.
- Better coordination.
- There does not seem to be any oversight or coordination each agency operates as it own little country.
- Let's all come together and work as one with each other.
- Adopt the ICC Fire Prevention Code and drop the Florida Fire Prevention Code as it stands now.
- To ensure consistency in plan review and inspections in the applicability and enforcement of the codes, housing plan reviewers and inspectors under one administrator/authority would seem to be beneficial.
- Keep the fire service involved with all new and existing building / occupancy projects.
- If local AHJ are to be involved with enforcement of these areas then that is what a Florida Specific Code should be used for.
- I think it is only fair that Plans Reviewers working for State and Local Agencies should be licensed as Architects and Engineers to qualify for Building Plans Review and Inspection jobs. Architects and Engineers, after all, are the ones assuming the liability for their designs when they are required by state statutes to sign and seal their construction documents.
- Get more top notch journeymen to be local building inspectors.
- Coordination and elimination or standardization of criteria among all codes is imperative. Every effort should be made to coordinate all codes, eliminate redundancies and conflicts or just use the national standard references and leave it alone.
- Implement programs and procedures for more open communication, friendly interaction and collaboration.
- Coordinate the interaction better by having interaction conferences with departments.
- Fix the code section and statutes for elevators. Chapter 30 FBC only says "when provided".
- Create "super Board" made up of fair and open-minded individuals from each agency that could review these conflicts and provide binding resolution.
- Additional monitory training.
- Simplify.
- More education and frequency of inspection.
- Leave building inspections and fire inspections to the building and fire departments.
- Have local building and fire officials continue to try and work together to solve any differences that may exist, but to continue to let each have a role in the approval and inspection of new building construction.
- Provide a process for state agencies to submit code modifications.
- There is no reason that DOE should have different codes or rules when it comes to building and fire codes. Eliminate their special rules and codes. Revamp the elevator code enforcement. Educate ACHA inspectors.
- Continue to enforce both the FBC and the FFPC to insure that all aspects of buildings and properties inside and out meet the minimum code requirements. This will provide safer buildings for the public.
- Since the local building department is the main point of contact of code regulation for contractors and citizens, other state agencies should be required to coordinate projects through the local building departments.