BUILDING OFFICIALS ASSOCIATION OF FLORIDA

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November 5, 2026

Uniform Permit Application Workgroup
Attn: Jennifer Bridges & Mo Madani

Re: BOAF Uniform Commercial and Residential Building Permit Application Recommendations

Dear Members of the Uniform Permit Application Workgroup:

On behalf of the Building Officials Association of Florida (BOAF), I am pleased to submit for your review the enclosed proposed Uniform Commercial Building Permit Application and Uniform Residential Building Permit Application. Our members, who administer permitting in jurisdictions across Florida, prepared both forms for the Workgroup's consideration.

BOAF recognizes that the Legislature has directed this effort to adopt uniform applications and that, to the extent feasible, they must be capable of integration with existing local permit software and account for local amendments to the Florida Building Code (FBC). Beyond that, the legislation does not list the fields the form must contain. We support common applications that will reduce the burden for owners, contractors, and design professionals in having to meet different forms and data requirements. These forms will also give local permitting departments a consistent starting point that can work with their existing permit software.

It is important to recognize that a single form must also work for a very diverse set of users. Florida has more than 400 permitting jurisdictions, from very small towns to large communities of several hundred thousand residents. Many small jurisdictions still process applications in person or via email and serve smaller contractors and many owner-builders. Larger jurisdictions typically handle higher volumes through electronic systems. Therefore, BOAF has concerns about the initial proposal to add drop-down fields to the application. Many jurisdictions simply print the application in the office, and applicants fill it out by hand at the permitting counter. Drop-down selections do not work on a printed page. **BOAF recommends that the final form rely on plain fill-in blanks and check boxes that work equally well on paper and on screen, and that any electronic version present those same fields.**

The earlier proposed form also included fields for other jurisdictional departments, which could cause problems. Other departments typically have their own applications for items such as zoning verifications and public works permits, including Right of Way permits, and those departments regulate and issue them separately from the Building Department. A building permit application that collects information for those approvals could conflict with each department's own process. **BOAF recommends that the uniform applications be limited to building permit information and leave those other approvals to the departments that issue them.**

The original proposed application also appeared cluttered with additional fields and permit data that many contractors and owner-builders may not know, including flood zone information, occupancy classification, and construction type. Many applicants are new to building permitting. An application that asks for information they cannot supply may overwhelm them, and some residents and contractors may then do the work without a permit. **BOAF recommends that the uniform applications ask only for information an applicant can reasonably be expected to provide, and that jurisdictions determine technical data such as flood zone, occupancy, and construction type during plan review.**

Finally, a complicated form could lead many jurisdictions to resist using it, which in turn could place them in violation of state statute. A uniform application succeeds only if jurisdictions of every size can adopt it and use it as written. Keeping the form simple is the best way to secure that statewide compliance.

The attached draft forms for the Working Group's consideration keep in mind the points raised and our recommendations above. We built these forms around the statutory minimum, with optional sections marked "if applicable" and kept the forms short enough for a counter transaction in a small office and structured enough to integrate with the permitting software that larger jurisdictions use. They would accommodate both paper and electronic submission, and they leave additional documents and separate trade permits to each jurisdiction, with a notice that applicants should check with the local permitting department.

The residential and commercial forms share one structure, and each has two parts: an application form and the required affidavit and notary. We also have included a set of drafting notes for discussion purposes among the Workgroup and interested parties. The applications list the statute that supports it, chiefly s. 713.135(5) and (7)(a), F.S., so reviewers can see what the law requires and what is proposed. The final draft would not need to provide this information to the applicant; however, we wanted to provide the information for reference at this time.

The proposed forms collect the following:

- Type of work (new structure, addition, alteration, repair or demolition).
- Job and property information, including legal description or tax folio number.
- Owner, fee simple titleholder (if other than the owner), and contractor, with the contractor's certification or registration and certificate of competency numbers.
- Bonding company, architect or engineer, and mortgage lender, where applicable.
- The statutory certification, owner's affidavit, and warning to owner, with signature and notary blocks for paper submission and the owner's electronic submission statement under s. 713.135(7)(b)1, F.S.

Several items go beyond the statutory text and are marked for the Workgroup's discussion: scope of work, project valuation or construction cost, and private provider plan review and inspections. The drafting notes also ask whether to add language encouraging applicants to contact the local permitting department about additional documents, separate trade permits, or subcontractor affidavits, and whether to collect technical data such as square footage, occupancy, and construction type. The permit number is a statutory item, but jurisdictions generally generate it in their own permitting systems.

We ask the Workgroup to review both proposed applications and the discussion items in the drafting notes. Our intention is to assist the Working Group based on our membership's knowledge. BOAF welcomes the chance to discuss these proposals with the Workgroup and answer any questions.

Thank you for your time and for the Workgroup's service on this project.

Respectfully submitted,



Jonathan Bilby
BOAF Vice President

Enclosures:

1. Uniform Residential Building Permit Application (November 3, 2026 - draft Word and PDF with Notes)
2. Uniform Commercial Building Permit Application (November 3, 2026 - draft Word and PDF with Notes)
3. Application Instruction Document