

FLORIDA BUILDING COMMISSION



BUILDING CODE SYSTEM ASSESSMENT SURVEY RESULTS

REPORT TO THE FLORIDA BUILDING COMMISSION

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CONSENSUS CENTER

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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 this year (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 Commission meeting consider and develop 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 Survey 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 will meet at the October 2010 Commission meeting, and the Commission will consider the Ad Hoc's recommendations at the December 2010 meeting for inclusion in the Report to the 2011 Legislature.

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:

I. 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.

II. 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.

III. 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.

IV. 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.

V. 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.

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 survey ran from June 25, 2010 through August 30, 2010, and there were 85 respondents to the survey.

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.

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

Representation	Number of Survey Respondents
	Total Number of Survey Respondents*: 85
Architects	25
Building Officials/BOAF (plans examiners, inspectors, administrators)	8
Building Suppliers	2
Consultants (unspecified)	8
Contractors: Electrical	2
Contractors: General	3
Contractors: Home Builders/Associations	4
Contractors: Mechanical	1
Contractors: Plumbing	1
Contractors: Roofing	1
Engineers	2
Fire Officials	2
Florida Building Commission	10
General Public	9
Lawyers	1
Local Government	7
Product Manufacturers/Associations	5
Public Education/School Boards	4
State Government/Agencies	3
Testing Services/Labs	1
<i>*The number of survey respondents by representation exceeds the total number of survey respondents since some respondents represent multiple representations/stakeholder groups.</i>	

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

FLORIDA BUILDING CODE SYSTEM *(3.5 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 3.5 out of a possible 5.0)*

Ranking Scale	5	4	3	2	1	Average
Total	14	34	21	9	6	3.5

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.

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 conservative 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 too 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 versus 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 FI 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 nest 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 how 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.

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 underling 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 IFC 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 is 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.

I. 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	12	27	24	14	7	3.3

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.

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.

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 addendments 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 to 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.

II. THE FLORIDA BUILDING COMMISSION

How well is the Florida Building Commission functioning?

Ranking Scale	5	4	3	2	1	Average
Total	19	26	20	8	7	3.5

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.
- 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.
- Commissioner do not seem to be as well prepared as they should be.
- Too long for decisions.

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.

III. 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	12	27	17	18	7	3.2

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.

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.
- No comment.
- 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.

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.

IV. 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	7	24	23	15	8	3.1

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.

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.
- no response --Paul Myers, Putnam County Planning & Development Services
- 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 were 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.

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.
- see V above --Bradford Bishop, Bishop Engineering Company
- 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.

V. 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	15	25	19	11	7	3.4

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.

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.

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.

A. BUILDING CODE INFORMATION SYSTEM (BCIS)

How well is the BCIS functioning?

Ranking Scale	5	4	3	2	1	Average
Total	12	21	24	7	5	3.4

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.

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 too many links to the original BCIS. "Hot Topics" are used to often the links to those subjects should be made to the system menus.

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.

B. MANUFACTURED BUILDINGS PROGRAM

How well is the Manufactured Building Program functioning?

Ranking Scale	5	4	3	2	1	Average
Total	8	12	31	3	3	3.3

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.

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.

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.

C. PROTOTYPE BUILDINGS PROGRAM

How well is the Prototype Building Program functioning?

Ranking Scale	5	4	3	2	1	Average
Total	4	12	22	3	8	3.0

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.

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.

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.

D. PRIVATE PROVIDER SYSTEM

How well is the Private Provider System functioning?

Ranking Scale	5	4	3	2	1	Average
Total	7	13	18	6	15	2.8

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.

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 receive 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 overview. They are used as a way to avoid building department overview and rush the job through.
- I don't think that a company hire by the owner have 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 d=fees are down and people are threatened with lay-offs of staff, they get very territorial.
- Inspections are drive 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 a inspection by the Building Department.

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.
- Due away with it --James Schock, City of Jacksonville
- Reintroduce 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.

E. 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
Total	4	16	22	14	17	2.7

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.

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.

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.

F. 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	7	14	31	3	11	3.0

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.

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.

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 late, all too late we found that it was broken. The evidence was at had 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.