

Madani, Mo

From: Jack Rauch <jack@tewandtaylor.com>
Sent: Friday, May 15, 2026 4:19 PM
To: Madani, Mo
Cc: Lisa Miller
Subject: Private Provider Association of Florida Comments on Proposed Private Provider Forms
Attachments: PPAF Proposed Inspection Report.docx; PPAF Proposed Certificate of Compliance.docx

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Mr. Madani,

Thank you for the opportunity to comment on the proposed Private Provider Inspection Form and Certificate of Compliance Form circulated under HB 803. I am writing as Chairman of the Private Provider Association of Florida (PPAF). The points below are our recommended edits to the Commission's proposed forms, and they support several comments already submitted in the open period and respond to others. Our proposed versions of both forms, incorporating these edits, are attached for the Commission's consideration.

1. Inspection Code field. The proposed Inspection Form includes an "Inspection Code" field. We recommend removing it. Inspection codes vary by municipality, jurisdictions revise them frequently, and there is no statewide code dictionary. A statewide form cannot accommodate that variability, and it is not realistic for a private provider operating across multiple jurisdictions to track every local code set. The statute already provides the uniform framework through FBC Section 110.3, which the form should reference directly through the description field. We support the comments already submitted recommending removal.

2. Notary block on the Certificate of Compliance. The proposed Certificate of Compliance includes a notary block. We recommend removing it. A notary is not legally required. F.S. 553.791 already requires the private provider to sign and seal the Certificate of Compliance or electronically transmit it to the local building official, and that statutory sign-and-seal is the authentication mechanism the legislature established. A Florida-licensed professional's seal carries legal weight and liability. Layering a notary on top is redundant and creates a real field problem: as other commenters have noted, some jurisdictions are requiring private providers to digitally sign, print the digital signature, and then physically notarize the printout, which is not consistent with the rules governing digital signatures and defeats the electronic transmission framework the statute contemplates. We support the comments already submitted on this point.

3. Compliance attestation on the Inspection Form. The proposed Inspection Form includes the language "the above-referenced inspection has been completed and is in conformance with the approved plans and the applicable codes." We recommend removing the compliance language from the Inspection

Form. That attestation cannot logically apply to a Partial Pass, Failed, or Canceled inspection. Including it on every Inspection Report creates an internal contradiction. The Inspection Report should carry only a factual attestation that the inspection was performed and the result accurately reflects field conditions. The compliance attestation belongs on the Certificate of Compliance at project closeout, where the proposed Certificate of Compliance already places it.

4. Trade categories checklist on the Certificate of Compliance. The proposed Certificate of Compliance includes a trade-by-trade checklist (Building, Mechanical, Electrical, Plumbing, Gas) with Yes / No / N/A columns. We recommend removing the checklist. F.S. 553.791 does not require a trade-by-trade breakdown on the Certificate of Compliance, and the trades inspected, dates, and results are already documented in the individual Inspection Reports attached to or incorporated by reference into the Certificate of Compliance. The checklist duplicates that information and creates two records that must be kept consistent. If the Commission retains it, the columns should be “In Compliance” / “N/A,” not “Yes” / “No,” because a private provider does not issue a Certificate of Compliance for a project that is not in compliance.

5. Single-visit inspection format. The proposed Inspection Form is structured to document one inspection per form. We recommend the form be revised to accommodate multiple inspections from a single site visit by a single inspector on a single permit (for example, all MEP roughs performed on one trip), while not functioning as a daily firm-level summary that bundles inspections across multiple jobs, permits, or inspectors. A per-visit format, with multiple numbered inspection rows, keeps the inspector attestation tied to the specific work being certified.

6. Statutory definition of “applicable codes.” F.S. 553.79 defines “applicable codes” to include the Florida Building Code and any local technical amendments but expressly excludes the fire prevention and firesafety codes adopted under Chapter 633. Some local building departments are conflating fire review with the private provider scope. We would ask the Commission to consider whether reproducing the statutory definition as a footnote on both forms, or referencing it in the form instructions, would help reinforce that distinction at the point of delivery.

7. Proposed flood hazard area checkbox. We reviewed the comment submitted recommending a flood hazard area checkbox be added to both forms. Respectfully, we recommend the Commission decline that addition. We share the goal of ensuring as-built lowest floor elevation documentation is in the record, but the 553.791 standardized forms are not the right place to capture it: (a) flood hazard determination is a separate floodplain administration function performed by the local floodplain administrator based on FIRM maps and elevation certificates, none of which fall within the private provider’s plan review and inspection scope; (b) the flood hazard determination is already in the permit record at the building department; (c) FBC Section 111.2(6) places the as-built lowest floor elevation documentation obligation on the certificate of occupancy, not on the private provider’s Certificate of Compliance; and (d) loading flood-specific fields onto forms used statewide bloats every form for the subset of projects where the field is relevant. Floodplain documentation should be requested directly from the applicant by the jurisdiction where required.

8. Duplicative and changeable fields. The proposed forms include several fields that we recommend removing because they are duplicative or because the information changes during the project: Owner Name, Contractor, Project Name, Applicant Name, the secondary Address field on the Certificate of Compliance, the Summary of Inspections Performed line on the Certificate of Compliance, and Inspection Report number. Multiple commenters have reached the same conclusion on these removals.

Permit number and Site Address are sufficient to identify the project. We also recommend the forms (a) refer to the property as "Site Address" consistently on both forms, (b) include a "Print Name" field paired with the signature, (c) include a "Date Signed" field, (d) include a footer indicating "Adopted by Florida Building Commission – Effective Date 7/1/2026," and (e) be provided in both MS Word and form-fillable PDF versions. We understand that several commenters have offered to assist the Commission with form-fillable PDF formatting once the final forms are adopted, we would like to extend that offer as well.

Please confirm that this submission to you transmitted over email is sufficient to comply with the May 18 deadline for commentary.

The Private Provider Association of Florida is happy to participate further if it would be useful. Please feel free to contact me directly with any questions.

Respectfully,
Jack

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STATE OF FLORIDA
PRIVATE PROVIDER INSPECTION REPORT

PROJECT INFORMATION			
Permit Number		Inspection Date	
Jurisdiction			
Site Address			

PRIVATE PROVIDER	
Firm Name	
Inspector Printed Name	
Inspector License Number	

INSPECTION RESULTS (per FBC Section 110.3)			
No.	Inspection Description (FBC 110.3)	Result	Deficiency (if any)
1			
2			
3			
4			
5			
6			

INSPECTION SUMMARY / COMMENTS

INSPECTOR ATTESTATION

I hereby certify, in accordance with section 553.791, Florida Statutes, that the inspection(s) listed above have been performed under my authority on the permit and site identified above, and that the results stated above accurately reflect the conditions observed in the field as of the inspection date.

Authorized Signature		Date Signed	
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STATE OF FLORIDA
PRIVATE PROVIDER CERTIFICATE OF COMPLIANCE

PROJECT INFORMATION			
Permit Number(s)		Date of Certification	
Jurisdiction			
Site Address			
Firm Name			

PRIVATE PROVIDER ATTESTATION

Pursuant to the authority granted under Section 553.791, Florida Statutes, and to the best of my knowledge and belief, the building components and site improvements outlined herein and inspected under my authority have been completed in conformance with the approved plans and the applicable codes per FBC Section 110, as issued and approved by the governing authority having jurisdiction for this project. All required inspections, including final inspections, have been performed, and the corresponding inspection reports are attached hereto and incorporated by reference. I respectfully request the issuance of a certificate of occupancy and/or completion as applicable.

Private Provider Signature	
Printed Name	
License Number / Seal	
Date Signed	

