 

**SUMARY OF FEEDBACK RECEIVED ON THE ICC CODE DEVELOPMENT PROCESS**

**(MARCH 9, 2017)**

**BACKGROUND**

In 2015, ICC entered into a new agreement with ASHRAE to develop the 2018 IgCC. As a result, hosting a Group C cycle was not necessary. Since the announcement, ICC received numerous suggestions on what to do in 2017 since there would not be any Code Development activity. Additional suggestions were received by many members and organizations on what they feel could be improvements to the Code Development Process.

Recognizing the need to formalize the process to allow ICC stakeholders to provide feedback directly to the ICC Board, the Board directed staff to engage the stakeholders by announcing a “Call for Feedback” on any and all aspects of the ICC Code Development Process.

This call involved the following steps to date:

* 9/20/16: Call posted on the ICC Feedback [website](http://www.iccsafe.org/about-icc/periodicals-and-newsroom/icc-board-solicits-feedback-on-the-icc-code-development-process/)
* 9/22/16: Call noted in ICC eNews
* 10/17/16: Feedback received presented at the 2016 Annual Conference
* 11/23/16: Feedback received posted on ICC Feedback website
* 12/9/16: ICC Board briefed on feedback received to date
* 1/18/17: Feedback received as of 1/1/17 posted on ICC Feedback website
* 1/23/17: Feedback reminder in ICC eNews
* 2/15/17: Feedback deadline
* 3/9/17: Feedback posted for comments

**COMMENTS ON FEEDBACK**

In accordance with the implementation schedule posted on the ICC Feedback website, this current step is the solicitation of comments on feedback received. The feedback included in this summary is comprehensive and includes all feedback previously posted. Comments are due **APRIL 10, 2017.** The feedback has been presented in a logical flow based on the steps in code development and is keyed to a corresponding number. When providing comments, please cite the feedback number in your comment.

Comment process:

* Summary of Feedback is posted in Word for ease of use in providing comments directly on the document.
* Download and rename the file with your name on it.
* Provide your comments in *italics* directly below the feedback item you are commenting on. See below for sample:

10

During code change development, all code changes should be made “public”. Fosters collaboration.

*Making all code changes public as they are developed is………*

* If you choose to comment on only a few items, you can also submit comments on a separate file with just the comment itself, keyed to the feedback item. See below for sample:

10 *Making all code changes public as they are developed is……..*

Submit your comments (with attachments) to: [ICCCodeProcessFeedback@iccsafe.org](mailto:ICCCodeProcessFeedback@iccsafe.org)

**NEXT STEP**

In accordance with the implementation schedule, a Final Report will be submitted to the ICC Board for the May/2017 Board meeting.

**If you have any questions, contact Mike Pfeiffer @** [**mpfeiffer@iccsafe.org**](mailto:mpfeiffer@iccsafe.org)**.**

**FEEDBACK PRESENTATION ORDER**

**2018/2019 Cycle**

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**cdpACCESS**

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**Beyond 2018/2019 Cycle**

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**FEEDBACK RECEIVED ON THE ICC CODE DEVELOPMENT PROCESS**

The feedback is not organized by any hierarchy of importance but is rather a running list of issues organized by sequential topics in a cycle.

**2018/2019 Cycle**

**Code Groups**

1 (Feedback number – cite number in comment submittal)

Group A: Admin, IBC – E, FS, G, S; IEBC, IFC, IPMC, IUWIC, IZC

Group B: IECC, IFGC, IMC, IPC, IPSDC, IRC – all, ISPSC

2

Group A: IBC – E, FS, G; IFC, IFGC, IMC, IPC, IPSDC, ISPSC, IUWIC

Group B: Admin, IECC, IBC – S, IEBC, IECC, IPMC, IRC – all, IZC

3

Re-instate Group C: IECC and IRC – Energy. Reduces the number of code changes considered in Groups A and B. Other codes such as IMC and IPC could also be moved to Group C.

Feedback received did not support a Group C but rather voiced support for the proposed revised processes with 2 committee hearings which requires the third year.

4

Retain Group C as a cycle to review Group A and B final actions and to resolve coordination and consistency issues which resulted. The Code Correlation Committee could preside.

5

Include IFC with IBC and IEBC.

6

Move Admin to Group A. Encourages more SDO’s to attend and participate, resulting in coordinated standards.

7

Continue with third year as a year with no code development. Allows for reflection on actions, ICC meetings/networking, education and preparation for the next cycle.

8

Structural aspects of I-Codes should be in the same Group as Admin (Group B). These codes rely heavily on referenced standards.

9

Move the IFC and IRC into the same cycle. IFC is responsible for IBC Chapter 9 and both deal with similar fire protection related referenced standards.

**cdpACCESS - General**

10

During code change development, all code changes should be made “public”. Fosters collaboration.

11

During code change development, all code changes should be made “public” to allow anyone to see the code content being developed - code text only, not reason or cost impact statements. Fosters collaboration and reduces the number of code changes.

Feedback received on posted item above: The value in making all code change proposals “public” has limited value.

12

Allow cdpACCESS users to sign up for alerts (e.g. interested in IBC Chapter xx code changes being developed) in order to be notified when a proponent is developing a public code change. This will foster possible collaboration by interested parties prior to submittal. Do not make all code changes “public”.

13

Post code change/public comment agenda at least 60 days prior to hearings. Another recommendation notes 8 – 10 weeks is preferred.

14

Continue to enhance/de-bug the cdpACCESS system - particularly numbered lists and tables.

15

Add an export function to create a spreadsheet to track proposals.

16

Provide print feature for voting members to record their votes.

17

Provide the ability to cut and paste from Word docs into cdpACCESS.

18

Drop down search filters need to be clarified. You can filter results by code change identifier (e.g. FS, S, F, EB, etc.) but not by hearing committee (e.g. structural code changes to the IEBC are “EB” changes but they are heard on the IBC – S agenda.)

19

Conduct regional cdpACCESS “how to” forums to educate Members.

Feedback received on posted item above: Questioned if the value would offset the cost. The cdpACCESS program is fairly intuitive.

20

CAH and PCH hearing videos should be free, not part of an ICC subscription service.

**cdpACCESS – On-line voting process**

21

Ability to block vote

* Assembly motion: Ability to block vote to support all committee recommendations
* OGCV: Ability to block vote to support all Public Comment Hearing actions
* Ability to vote on select code changes and block vote the remaining as noted above

Feedback received in response to posted item above:

This would result in a significant increase in the number of votes cast and should be implemented.

Block voting should not be permitted. Each vote needs to be well informed and represent the individual voters view.

22

OGCV voting system needs to be improved. Significant delays encountered with screens “jumping”. Occasionally the votes would disappear.

23

Once you cast a vote on the OGCV, your vote should be indicated without having to refresh the screen.

24

Those who attend the PCH will often mark-up their Discussion Guide with their votes, with the Discussion Guide presenting the items in hearing order. This causes confusion when the voter must then vote on the OGCV and the code changes are assembled in numerical order.

25

Simplify OGCV voting by having all the votes to be cast in one location and a single “cast vote” button.

26

OGCV ballot page should only include the PCH action. Including the CAH action can influence the vote by the members. PCH actions which overturn the CAH seem to be overlooked when voting, with members voting for the CAH action as evidenced by the significant number of 2016 PCH actions overturned in the OGCV.

27

Set an OGCV quorum, possibly a multiple of the PCH votes cast. If quorum not achieved, PCH action is the final action.

**Code change submittals**

28

Maintain a due date for code change submittals in the second week of January.

29

Implement a requirement for specific data as justification for a change. “The amendment is needed because X event may happen in the future” is not specific justification.

30

Code Correlation Committee (CCC) should more aggressively review code changes to determine if the code change is purely editorial. If editorial, the code change should not be processed via the hearings. CCC actions need to be documented which allow the stakeholders to dispute the CCC decisions or improve the code change.

31

ICC staff should be permitted to submit code changes based on the questions they encounter on a daily basis.

Cost impact

32

Implement strict cost impact justifications/empower staff to reject submittal if adequate information not provided.

Feedback received on posted item above: Attempting to develop a standardized way to assess cost impact is a slippery slope. The hearing process addresses it adequately.

33

Cost impact statements on energy proposals should be based on life-cycle savings and cost effectiveness

34

Current process for cost impact is working effectively. The hearing ultimately is the venue to assess cost impact.

35

Discontinue requirement to provide cost impact, it is of limited value in the process. There are no accepted standards or analysis methods. When relevant, cost impact is typically addressed in the reason statement.

**Referenced Standards**

36

Process referenced standards updates by the applicable code development committee, not the Administrative committee.

Feedback received on posted item above: Where a single standard is referenced in multiple codes, the standard would need to be assigned to a specific code committee.

37

Proposed code text that is intended to correlate with an update to a standard should be considered by the applicable committee as well as the updating of the standard itself. This would require the updated standard to be completed by the PCH of the cycle which considers the text revision.

38

Develop a mechanism to ensure correlation between updated referenced standards and corresponding changes to the text which are intended to correlate with the updated standard. The process was understood at the PCH with actions providing the necessary correlations but actions taken during the OGCV overturned the PCH actions.

**Code Development Committees**

39

Require more restrictions on committee balance. Limit single stakeholder balance. Ensure broad interests represented. No organization/interest group should control more than 20 - 25% of the committee.

40

The IECC – Commercial Code Development Committee should have 1 – 3 actual end use customers on the committee. They are directly affected by the code.

41

The percentage of builder-designated seats should be reduced – ideally no more than one builder designated representative on a committee.

42

Need more end users of the code involved and on committees.

43

Committee members need to be appointed who will always exercise professional decorum while on the dais.

44

Appoint committee members who are well versed in the subject matter. This includes committee assignments made by staff to specific members of the committee. Some committee members should abstain from the vote if not well versed in the subject matter. Provide training to committee members.

45

The Admin committee should be limited to matters of code enforcement and administration and not technical content.

**Committee Action Hearing (CAH)**

Modifications

46

Eliminate modifications from the floor. If it is not ready, vote it down. It will speed up the hearings. Put the burden on the proponent to either submit a public comment or further investigate the issue and submit in the following cycle.

47

Committee’s spend too much time “fixing” code changes with modifications. It often results in poor code text.

48

Modifications submitted at the CAH often cause confusion and challenges the process in terms of review and lack of preparation to conduct the hearing. As a result:

* All modifications should be submitted electronically and posted one week prior to the hearing.
* Chair rulings as to “in or out of order” should be made in advance and posted.

Floor Motions

49

Eliminate assembly floor motions: Same objective can be achieved through submittal of public comment. The Report of the Committee Action Hearing (ROCAH) can be posted earlier – providing more time to develop a public comment. Time savings can result in an earlier posting of the Public Comment Agenda.

50

Retain assembly floor motions but eliminate the online vote after the CAH – the vote should occur at the CAH as in the past. Successful assembly motions should be the standing motion at the PCH. Encourages participation at the CAH and provides checks and balances to the committee action.

51

Successful assembly motions should be the standing motion at the PCH. Assembly actions are more representative of the interest of the ICC membership and therefore should carry more weight in the process.

Feedback received on posted recommendation to eliminate floor motions: Assembly floor motions and the actions that result have value.

Other

52

Changes to hearing order: Unfortunately, some use the ability to change the order to possibly gain tactical advantage, many over the objections of the proponent. Staff should continue to develop the hearing orders. Consideration of changes to the hearing order should include:

* Contact proponent in advance of hearing and seek permission. If proponent objects, the code change should not be moved.
* All changes to the hearing order must be requested in writing by a designated date and posted.
* Objections to hearing order changes which are posted must be submitted and posted.
* Make hearing order request at the hearing

Alternatively:

Allow staff to decide hearing order changes in advance based on input received. Staff publishes final hearing order.

In both scenarios, the hearing order is set at the outset of the hearing and cannot be further changed as the hearing progresses.

53

Establish formalized process to group code changes to expedite hearings.

54

Multiple part code changes with parts going to different committees often impacts the participants length of stay on the participants as they have to attend multiple committee hearings.

* Assign code changes which impact more than one code to a single committee

55

Hearings are too long with very few who can fully participate. Need to streamline the process.

56

Eliminate the two track system. Ability to participate in concurrent tracks is impacted by the ability to have multiple representatives in attendance at the hearings.

57

Representatives from a specific entity should be required to recuse themselves when a code change from the entity is before the committee.

58

Allow Moderators to grant extra time for testimony when there is a clear disagreement among the testifiers on matters of fact.

**Public Comment Submittals**

59

A positive CAH action (e.g. AS) seems to influence the outcome of the OGCV, resulting in a positive OGCV result. 2016 code changes that were Disapproved at the CAH and then Approved as Modified by Public Comment at the PCH had a record number of OGCV overturns resulting in Disapproval. This record number of overturns may result in public comments not being submitted even if the comment is viewed as improving the code change due to the possibility of OGCV action overturning a successful PCH action.

60

If a code change receives only public comments supporting or opposing the committee action, without a corresponding modification, the code change should not be considered at the PCH but rather placed directly on the OGCV. This will save hearing time. It would be incumbent on the public commenters to provide their reasoning with the submittal as the code change would not have any PCH input.

**Public Comment Hearing (PCH)**

61

Hearing participants/voters need to be reminded that they are not determining the final disposition on the code change at the PCH but rather setting the agenda for the OGCV

62

Eliminate the need to overturn the standing motion of Disapproval in order to consider a Public Comment. To approve a Public Comment still requires 2/3 which should suffice. Sustaining the Disapproval does not allow errors/fixes in code changes to be remedied. Some may abuse the ability the process by voting to uphold the standing motion in an effort to speed up the hearings.

63

Voting majorities: Code changes which do not receive the requisite majority are Disapproved. This may cause proponents to not submit a public comment to “clean up” a code change that was approved by the committee due to the risk of not achieving the required 2/3 majority.

* Where the code change does not achieve the requisite majority, the action on the code change should be the Committee Action.

64

Tabling: Allow code changes to be tabled in order for the parties involved to discuss the issue and then bring the item back to the floor.

65

Withdrawing a code change: Currently you can withdraw a code change up until the code change testimony has started. Allow the withdrawal to occur subsequent to the PCH action but before the OGCV in the event that unintended consequences are identified.

**Online Governmental Consensus Vote - General**

66

Discontinue due to:

* The PCH participants lose the ability to collaborate and make good decisions on the final outcome as the PCH is not the last step in the process.
* Two voting opportunities may result in unintended consequences of conflicting code text.
* The OGCV may increase additional lobbying opportunities.
* The OGCV process may result in uninformed members voting if they do not view the PCH videos.
* May result in reduction in PCH attendance.
* If electronic voting devices are not used at the PCH:
  + A 2 step voting process is required: Vote at the PCH and then the OGCV, which is not preferred. Could result in mistakes by the PCH voter when voting on the OGCV.
  + Could result in final actions that are based on OGCV vote counts that are considerably less than the vote counts at the PCH which determined the action to be placed on the OGCV.
* The overturning of PCH results from the 2016 OGCV seemed to indicate that decisions reached at the PCH were not considered by the OGCV voters. Many of the votes cast seemed to mirror the CAH results. This may have been due to lobbying efforts.

67

Do not eliminate the OGCV. Code officials input is invaluable in maintain the integrity of the code language.

68

Discontinue OGCV following the PCH but replace with real time OGCV voting during the PCH. Requires the online voter to participate in the PCH, albeit remotely. If real time voting cannot be accomplished, discontinue the OGCV.

69

Too much lag time for the OGCV process. It was nice to know the end result after the PCH.

**Online Governmental Consensus Vote - Voting**

See also “cdpACCESS – Online voting process” for feedback on cdpACCESS.

70

OGCV voting majorities: Overturning the PCH action should only occur where a clear majority of voters are opposed to the PCH action - possibly 2/3.

71

Limit OGCV voting to only code changes for which the PCH action is different than the CAH action. e.g., if the CAH = AS and the PCH = AS, this should be approved as Final Action without the need for the OGCV to allow a Disapproval to occur which would be one of the options.

72

Revise the OGCV ballot options: If the action at the PCH is AMPC and the action at the CAH was AS, then the OGCV options should be AMPC or AS, not AMPC or D.

Feedback received on posted item above supported this.

73

Code changes which receive the required 2/3 majority at the PCH should only require a 50% majority on the OGCV. The PCH is the venue to fully vet the code changes.

74

Publish the PCH voting results with the OGCV ballot. If OGCV voters see overwhelming or unanimous support they may re-consider a pre-established position prior to the PCH.

75

As part of the OGCV process, provide some type of statement/analysis that summarizes the objections from the CAH and whether or not the public comments address those concerns. Some may vote the same as the committee at the CAH without understanding the outcome of the PCH.

76

In light of the significant amount of PCH actions being overturned at the OGCV and the impact this may have on future public comments not being submitted to make editorial enhancements to the code change, treat “editorial” public comments intended to improve the language differently than public comments with significant changes. Public comments which are deemed editorial should only require a 50% majority, public comments with significant changes to remain at 2/3.

**Online Governmental Consensus Vote – 2016 Final Actions**

77

The 2016 OGCV saw a significant number of PCH actions being overturned. PCH actions that were overturned resulted in a positive PCH result being changed to a negative OGCV outcome. The resulting final action is of concern as this is contrary to the intent of the PCH which is to fully vet the code change - only to be overturned by the OGCV.

78

Require OGCV participants to provide a reason for their Disapproval vote in opposition to the PCH action. This will dissuade voters from voting for Disapproval based on a “because the committee voted for Disapproval”. Post these reasons with the OGCV results as feedback for the proponents of the code change/public comment. If this is not feasible to mandate such reasons, offer OGCV voters the opportunity to provide a reason and publish with the OGCV results.

79

Provide a mechanism for individuals to challenge the OGCV result where there was significant support at the PCH and the PCH action is overturned at the OGCV. This is outside the current appeals process (Council Policy 1) which limits appeals to matters of process and procedure.

80

A positive CAH action (e.g. AS) seems to influence the outcome of the OGCV, resulting in a positive OGCV result. Code changes that were Disapproved at the CAH and then Approved as Modified by Public Comment at the PCH had a record number of overturns. This record number of overturns may result in public comments not being submitted even if the comment is viewed as improving the code change due to the possibility of OGCV action overturning a successful PCH action.

81

Provide an opportunity for input to the Code Correlation Committee on matters of coordination and consistency of Final Actions.

**Final Action voters (PCH and OGCV)**

82

All ICC members should be permitted to vote. Industry experts need to have a say in the final decisions.

83

Code Development Committee members should be allowed to vote at the PCH and OGCV. They have the expertise and have prepared extensively for the issues that will be considered. Their testimony at the PCH would also enhance the process.

84

Process needs to be more responsive to building performance issues, with experts making the final decisions.

**Beyond 2018/2019 Cycle**

**Structural revisions to the process**

Feedback has included 4 proposed structural revisions to the process, with details. They are noted as “Revised Process Nos. 1, 2, 3 and 4”. All 4 proposed revisions include a common theme: **Expand the use of hearing committees beyond the current single Committee Action Hearing.**

The following is a summary of the benefits noted by the proponents of “Revised Process Nos. 1, 2, 3 and 4”:

* Expanded role of committee (2 hearings for each cycle) will result in a reduction in Public Comment Hearing volume.
* Expanded role of committee, utilizing their expertise to review initial changes and then follow up with review and action on public comments, will result in improved I-Codes
* Two CAH’s per cycle will reduce the number of modifications submitted since they can submit a public comment that is then considered by the same committee.
* Better vetting of the code changes: Allows proponents two opportunities to make their case to the same committee.
* Enhances the role and responsibilities of the Code Development Committees.

The following is feedback received on previously posted revised processes which expand the use of hearing committees:

* While this may appear to result in a better product brought to the membership for final action consideration, there is a concern that it will further reduce a dwindling building official participation at the committee hearings because their real stake is the vote that will not occur until the PCH and OGCV.
* Recommendations which advance multiple hearings in front of the same code committee should be seriously considered. A second committee hearing will improve the process.

**85**

**REVISED PROCESS NO. 1** - Expand to three year process. Allows for more code official participation in the process and maximizes correlation of both Groups A and B actions by holding the PCH/OGCV for both groups together.

* Year 1: Two Committee Action Hearings (CAH)
  + Submit Group A code changes
  + First CAH to consider code changes
  + Submit public comments in response to first CAH results
  + Second CAH to consider public comments
* Year 2: Repeat for Group B codes
* Year 3: Group A & B Public Comment Hearing followed by OGCV
  + Submit public comments for Groups A & B
  + Public Comment Hearing (PCH)for Groups A & B
  + OGCV for Groups A & B

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| --- | --- | --- | --- |
| **Timeframe** | **Year 1 Group A** | **Year 2 Group B** | **Year 3 Groups A & B** |
| January | Code changes due | Code changes due | Public comments due |
| March | Post code changes | Post code changes | Post public comments |
| April | 1st CAH | 1st CAH | Group A & B PCH |
| May | ------- | ------ | Group A & B OGCV |
| July | Public comment due | Public comment due | ------ |
| August | Post public comments | Post public comments | ------ |
| AC | 2nd CAH following AC | 2nd CAH following AC | AC only |
|  |  |  |  |

AC: Annual Conference

**86**

**REVISED PROCESS NO. 2** - Maintain 2 year process but eliminate hearing format. Use committee meeting format. Smaller meeting venues with a committee meeting format will reduce the amount of testimony currently encountered in the present hearing format.

* Year 1: Group A codes
  + Submit Group A code changes
  + Spring: Hold multiple 3 day Committee Action Meetings (CAM) for each Code (concurrent meetings with other Codes).
    - Approx. 12 consecutive days.
    - Further study/tabling permitted.
  + Submit public comments in response to CAM results
  + Fall: Hold multiple 2.5 day Committee Public Comment Meetings (CPCM) for each Code (concurrent meetings with other Codes). Approx. 10 consecutive days.
    - Committee acts on public comments
    - Committee action sets the agenda for the OGCV (OGCV agenda not set at a Public Comment Hearing by voting Governmental Members)
  + OGCV (Governmental Members) for Group A
    - Include Consent Agenda for ratification
* Year 2: Repeat for Group B codes
* Year 3: Publish Codes, training and education materials
  + Spring: Education Conference, CAC meetings, Member Councils
  + Fall: Education Conference, Meetings of Code Development Committees/CAC’s to review further study/tabled items

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| --- | --- | --- | --- |
| **Timeframe** | **Year 1 Group A** | **Year 2 Group B** | **Year 3** |
| January | Code changes due | Code changes due | * Education * CAC’s meet * Councils meet * Publish I-Codes |
| March | Post code changes | Post code changes |
| April | CAM – 12 days | CAM – 12 days |
| May | ------- | ------ |
| July | Public comment due | Public comment due |
| August | Post public comments | Post public comments |
| AC | CPCM following AC – 10 days | CPCM following AC – 10 days | Following the AC:   * CAC’s and Code Development Committees meet |
| November | OGCV | OGCV | -------- |

REVISED PROCESS NO. 2 includes the following recommendations:

Code Development Committees

* 6 year appointments; staggered. Results in improved knowledge, consistency in actions and effectiveness of the committee. Provides institutional knowledge from cycle to cycle.
* Minimum 50% Regulators. Equal distribution of Building and Fire Officials.
* CAC experience preferred.
* Code Development Committee Chair serves as Chair & Moderator.

Committee Action Meetings

* An action of “further study/table” is permitted at the Committee Action Meeting. The proponent would work with the applicable Code Action Committee (CAC) to develop/submit a public comment. If not resolved, item placed on CAC agenda for next cycle.
* CAM Meetings webcast

Committee Public Comment Meeting

* CPCM Meetings webcast

Code Action Committees

* 6 year appointments; staggered
* Minimum 50% Regulators. Equal distribution of Building and Fire Officials.
* Establish Goals & Objectives.
* Enhances the responsibilities of CAC’s as they would be responsible for the review of further study/tabled items from the Code Development Committees (see CAM above).

Feedback received on posted Revised Process No. 2:

* The proposed 50% minimum regulators should remain at the current minimum of 33%. Committee needs to be balanced in thirds. Code officials may not be able to commit to serving, thus may impact quorum requirements.
* Create a last shot (QPM) to change a standing motion for the OGCV. Link the qualified potential motion (QPM) to previous actions, meaning, the person making the QPM for the OGCV must have expressed disapproval (through public comment) on previous CAM motions. Approval of QPM must have one committee member person to support/sponsor. QPM’s go through a committee and staff to verify qualification of proposal submission. A successful QPM is an alternate proposal or position not on the OGCV ballot.
* The current hearing process is one of the strengths of the ICC and a committee meeting format would be detrimental.
* “Further study” would add value to the CAC’s and result in input to the Code Committees.

**87**

**REVISED PROCESS NO. 3** - Expand to three year process

* Year 1: Two Group A Committee Action Hearings (CAH)
  + First (Spring): Consider code changes, tabling allowed
  + Second (Annual Conference): Consider tabled items
* Year 2:
  + Spring: Group A Public Comment Hearings (PCH)
  + Group A OGCV
  + Annual Conference: First Group B CAH
* Year 3:
  + Spring: Second Group B CAH
  + Annual Conference: Group B PCH
  + Group B OGCV

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| --- | --- | --- | --- |
| **Timeframe** | **Year 1** | **Year 2** | **Year 3** |
| January | Group A:  Code changes due | Group A cont’d:  Public comments due | Post tabled items |
| March | Post code changes | Post public comments | ------- |
| April | 1st CAH | Group A PCH | 2nd CAH – tabled items |
| May | Post tabled items | Group A OGCV | -------- |
| July | ------- | Group B:  Code changes due | Public comments due |
| August | ------- | Post code changes | Post public comments |
| AC | 2nd CAH to consider tabled items - following the AC | 1st CAH following AC | Group B PCH following AC |
| November | ------ | ------- | Group B OGCV |

Feedback received on posted Revised Process No. 3:

* Opposed: Tabling items until later in the hearing will result in lower overall interest but stack the tabled later hearing. This will draw out the process and inserts greater confusion of those outside the process. This is not a good process change.

**88**

**REVISED PROCESS NO. 4** - Expand to four year process. Push back the code change deadline in each cycle to allow more time to develop code changes, collaborate and to solicit input. The additional time allows for the adoption process to start. With the typical lag in adoptions, a four year cycle seems reasonable.

* Year 1
  + Summer: Submit Group A code changes
  + Annual Conference: First CAH to consider code changes
* Year 2:
  + Submit public comments in response to first CAH results
  + Spring: Second CAH to consider public comments
  + Fall: Group A Public Comment Hearing
  + OGCV
* Year 3:
  + Summer: Submit Group B code changes
  + Annual Conference: First CAH to consider code changes
* Year 4:
  + Submit public comments in response to first CAH results
  + Spring: Second CAH to consider public comments
  + Fall: Group B Public Comment Hearing
  + OGCV

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Timeframe** | **Year 1** | **Year 2** | **Year 3** | **Year 4** |
| January | ------ | Public comments due | ------ | Public comments due |
| March | ------ | Post public comments | ------ | Post public comments |
| April | ------ | 2nd CAH | ------ | 2nd CAH |
| May | ------ | ------ | ------ | ------ |
| June | Group A:  Code changes due | Public comments due | Group B:  Code changes due | Public comments due |
| August | Post code changes | Post public comments | Post code changes | Post public comments |
| AC | 1st CAH following AC | Group A PCH following AC | 1st CAH following AC | Group B PCH following AC |
| November | ------- | Group A OGCV | ------- | Group B OGCV |

**89**

**REVISED PROCESS NO. 5 –** 4 years between editions

* Need more time between hearings to evaluate and work on public comments. This would result in better quality of Public Comments. This may necessitate two 18 month cycles with the codes published in the fourth year.

**90**

**REVISED PROCESS NO. 6 –** Committee meeting format

* Hearings are too long. Committee meeting format is much more efficient.

**91**

**REVISED PROCESS NO. 7** – “Two bites at the apple”

Revise the process to include two full cycles of code development for each code. This would require a “supplement” between cycles to be created and serve as the basis for the second cycle. Most jurisdictions do not adopt the current edition until a year or two after publication. The second cycle allows for jurisdictions to adopt and enforce the code for a period of time and still have time to submit a change in the second cycle if they encounter issues in their enforcement of the code.

**92**

**REVISED PROCESS NO. 8**

Consider staggering code change hearings for different codes in smaller venues to mitigate exceedingly long weeks of hearings which discourages broad participation.

**Miscellaneous**

**Overall Process/ Cycle comments**

93

3 year cycle is too short. Some construction projects take longer than 3 years making designs obsolete. Adoptions lag behind new code edition. Consider longer cycle, 5 – 7 years.

* Adoption process takes considerable time and resources
* Technology not evolving fast enough to warrant 3 year cycle
* Majority of approved code changes have little to no significance
* Most standards are on a 5 year cycle

Feedback received on this posted item noted disagreement. There is already too much time between methods/technology and code publication. Maybe find a way to migrate to “continuous maintenance” where interim changes can be adopted by the AHJ.

94

Establish a process to submit proposed changes to the ICC process via revisions to CP 28.

**Code Action Committees (CAC)**

See also “Revised Process No. 2” for expanded use of Code Action Committees

95

Some of the CAC’s submit a substantial number of code changes for which there does not seem to significant interest in the process, resulting in a significant amount of hearing time being expended. ICC should develop more stringent criteria to determine when a CAC code change is warranted.

96

Mission and scope of CAC’s need to be more clearly defined. Some have been very active, with many code changes being submitted. Some include controversial/substantive subject matter. Role of the CAC’s should:

* Focus on clarifying or improving code language and organization for enhanced usability.
* Not be submitting code changes that address matters of scope or technical provisions/ requirements of the codes.
* Not develop code changes that result in a new requirement.

97

CAC’s play a useful role in building consensus but it is time consuming and requires travel expenses. As a result, they are sometimes dominated by special interests in attendance. When a CAC takes on the special interest issue and submits a CAC proposal, it blurs the lines of consensus

**Feedback not specific to details of the ICC Code Development Process**

Require energy code education as part of certification criteria.

Many comments submitted dealing suggested revisions to the code.

Provide mechanism for special inspectors to enforce the code. When they perform their duties, they are routinely removed from projects for trying to perform a quality inspection.

Continue with periodic hearing prizes during the hearings. Gets participants back in the hearing room after breaks. Encourages some relationship building.

Provide adoption related materials:

Differences between the IRC and IPC plumbing provisions

Consolidate codes so that the user does not need to purchase several codes due to cross references between codes.

The ICC Building Valuation Data table that is published to establish a permit fee schedule is too simplified to allow one single cost per square foot when there are multiple variables that impact cost of construction.