

# Code Amendment Proposal Form

For public amendments proposed to the 2021 editions of the International Codes



**Instructions:** Upload this form and all accompanying documentation. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by **July 23, 2021**.

## CONTACT INFORMATION

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**Organization or Representing Self:** Self

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**Signature:**

## AMENDMENT PROPOSAL

Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: IECC

If you submitted a separate coordination change to another code, please indicate which code: \_\_\_\_\_

<u>Acronym</u>	<u>Code Name</u>	<u>Acronym</u>	<u>Code Name</u>
DBC-AP	Denver Building Code—Administrative Provisions	IFC	International Fire Code
DBC-xxxx	Denver Building Code—xxxx (code) amendments (e.g., DBC-IBC, DBC-IEBC)	IFGC	International Fuel Gas Code
IBC	International Building Code	IRC	International Residential Code
IEBC	International Existing Building Code	IMC	International Mechanical Code
IECC	International Energy Conservation Code	IPC	International Plumbing Code
		DGC	Denver Green Code

2) Please check here if a separate graphic file is provided:   
*Graphics may also be embedded within your proposal below.*

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is **BOLDING**, ~~STRIKEOUT~~ AND UNDERLINING. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

### Code Sections/Tables/Figures Proposed for Revision:

NEW Residential IECC

**Note:** If the proposal is for a new section, indicate (new).

### Proposal:

Revise as follows:

**R105.4 Approved third-party inspection agencies.** The code official is authorized to accept reports of third-party inspection agencies not affiliated with the building design or construction, provided that such agencies are approved as to qualifications and reliability relevant to the building components and systems that they are inspecting or testing.

Add new text as follows:

**R105.4.1 Authorization of approved third-party inspection agency.**

When the code official authorizes the use of a third-party inspection agency for all or some aspects of code compliance, the agency shall be authorized as a third-party extension of the code official to verify compliance.

**R105.4.2 Approved third-party inspections scope.**

The code official shall determine and communicate which compliance verification measures the third party inspection agency shall incorporate within their inspection processes.

**R105.4.3 Approved third-party inspections reporting.**

The approved agency shall submit inspection reports to the code official and to the owner's representative in accordance with Section 1704.2.4 of the International Building Code.

**Supporting Information:**

**Reason:**

This proposal better defines the relationship between an approved third-party inspection agencies and the code official. There are three aspects of the relationship that are specifically troublesome within the context of IECC enforcement and which this proposal addresses.

1. Assurance that a transfer of authority is established so that a third-party inspection agency is authorized to fail or pass the inspections they perform and that the party being inspected clearly understands that authority.
2. The code official alone must clearly establish what is needed from the third-party inspection agency. R105.4.2 above has been developed to ensure that the authority still rests in the hand of the jurisdiction. The section establishes a scope rather than an agreement and rightfully requires the code official to dictate the nature of the scope of work needed.
3. Lastly, anything inspected by a third-party agency must be reported to the code official and the owner's representative.

The clarity gained in the relationship between the authority having jurisdiction and the approved third-party inspection agency is crucial as we progress into more complicated and meaningful energy codes. Nationally, jurisdictions are losing experienced professionals to retirement. Consequently, more third-party inspection agencies are stepping in to fill the gap. These third-party inspection agencies tend to be solely focused on energy and are capable, and eager to work in the energy code compliance niche. They are filling a need for jurisdictions that are either understaffed or lack a desire to fully enforce the energy components of the code. This proposal clearly defines a path forward to meet the need by defining scope and responsibilities to better ensure compliance and thus achieve expected energy savings.

**Referenced Standards:**

**Note:** List any new referenced standards that are proposed to be referenced in the code.

**Impact:**

**Cost Impact:** The code change proposal will not increase or decrease the cost of construction

This proposal does not increase cost but better allocates dollars currently being spent to ensure that the job being undertaken by approved third party inspection agencies truly meet the needs of the authority having jurisdiction.

**Note:** Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

- The effect of the proposal on the cost of construction:  Increase  Reduce  No Effect
- The effect of the proposal on the cost of design:  Increase  Reduce  No Effect
- Is the proposal more or less restrictive than the I-codes:  More  Less  Same

**Departmental Impact:** (To be filled out by CPD staff)

**Note:** CITY STAFF ONLY. Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

- The effect of the proposal on the cost of review:  Increase  Reduce  No Effect
- The effect of the proposal on the cost of enforcement/inspection:  Increase  Reduce for the city  No Effect