



ICC COST IMPACT GUIDE

Developed by the ICC Industry Advisory Committee (IAC)

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ICC Cost Impact Guide

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By

International Code Council, Inc.

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PREFACE

Purpose:

The purpose of this Guide is to provide direction on the preparation of cost impact statements for code change proposals. Cost Impact Statements are required by [ICC Council Policy #28](#) (CP28) provisions.

Scope:

This guide consists of chapters which walk the reader through various applications and examples of Council Policy #28 (CP 28) provisions and the cost impact statement requirements. The document advises users about:

1. Intent of CP 28.
2. Purpose and examples of various types of cost impact statements.
3. Beyond cost of construction impact statements.
4. Use of bibliographies.
5. Sound advice.

HISTORY

Soon after the announcement of the creation of the International Code Council in 1993 the Industry Advisory Committee (IAC) was created. This committee purpose is:

“The purpose of the Industry Advisory Committee (IAC) is to promote, in cooperation with the International Code Council (ICC), public health, safety, and welfare in the built environment by serving as a national forum for the building community to interface with the ICC. For the purposes of the IAC, the building community is taken to include all those involved in the planning, design, construction, regulation, and utilization of buildings.”

From 2016 through 2020 the ICC Board of Directors (BOD) solicited comments from its membership. The goal of this solicitation was to receive constructive comments about updating the ICC’s Council Policies. The council policy that received the greatest attention was Council Policy 28 (CP 28) on code development. As a result of the number of comments received, the BOD created in 2020 the Long-Term Code Development Process Committee to review the comments and provide recommendations for policy improvement to the BOD. As part of the interface with ICC, the IAC recommended the development of a guide which provides information regarding the requirements concerning the cost impact statements that are required as part of every code change proposal.

This Guide has been developed with input from Industry Advisory Committee members, from code officials, and from ICC staff. The guide is intended to be a useful and informative resource that will help in understanding the purpose and objective of the cost impact requirements in the code submission process.

Suggestions and comments on this document are welcome and should be directed to the Code Council’s Codes & Standards Department.

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CHAPTER 1

Introduction to Council Policy 28

The International Code Council (ICC) is a nonprofit public benefit corporation that was organized under the Nonprofit Public Benefit Corporation Law for public and charitable purposes.

The ICC code development process serves as the mechanism whereby the ICC members and the general public are able to submit ideas for improvement to the International Code Council's I-Codes for consideration. As part of the considerations certain rules and regulations have been formulated under the title of "Submittal of Code Change Proposals" in CP 28. The purpose of the code submission process is to ensure that as complete a submission as possible is developed for the Code Development Committees, the ICC general membership, and eventually the ICC government voting members to be able to make an informed decision. The policy in its objectives also seeks to create a level playing field for all proponents and parties responsible for reviewing same.

As part of each step of this process one of the required proposal items that is evaluated is the "cost impact" of the code change.

CP 28 states:

"3.3.5.6 Cost Impact: The proponent shall indicate one of the following regarding the cost impact of the code change proposal:

- 1) The code change proposal will increase the cost of construction;*
- 2) The code change proposal will decrease the cost of construction; or*
- 3) The code change proposal will not increase or decrease the cost of construction.*

The proponent shall submit information which substantiates such assertion. This information will be considered by the code development committee and will be included in the published code change proposal. Supporting documentation may be provided via a link to a website provided by the proponent and included in the cost substantiation statement. The cost substantiation statement shall include the date the link was created.

Any proposal submitted which does not include the requisite cost impact information shall be considered incomplete and shall not be processed."

(Source: International Code Council CP 28 Copyright © 2019)

Notice that a proponent is expected to provide substantiation as to how the code change proposal will impact the code. The proponent is also expected to be able to articulate clearly how the proposal will impact the cost of construction. Providing additional information may be included to further substantiate the proposal may include references to studies, research papers, costs beyond the construction period, etc. The necessity for such additional information, such as

cost data, surveys, research, etc. about construction costs, is entirely up the proponent whether to submit said references and how many.

It is the responsibility of the proponent to develop a persuasive Cost Impact Statement. The Cost Impact Statement, in addition to all other information necessary for a complete code change proposal, will contribute to the approval of the code change proposal (e.g. “as submitted,” or “as modified”). While a Cost Impact Statement can be difficult to develop, it is a necessary part of the ICC process, so reviewers of a proposal can understand the implications and net effects of that proposal.

It should be noted that a proponent is permitted to submit more information than is required in CP 28. In some cases, the code benefit extends beyond initial cost and represents an analysis process that users apply for the purpose of analyzing options before making a decision (i.e. assessment of pros and cons beyond initial cost). The process normally includes assembling the sums of the benefits for a specific situation and then applies the costs associated with each of those individual benefits. This means that some basic steps must be established in order to execute the analysis process, which may include: specifying the options, assigning costs to options, identifying the impacts, establishing as scale or benchmark, and then analyzing and prioritizing the results. This means that the user must apply or assign a monetary value to each benefit and then assess which option provides the best benefit.

CHAPTER 2

Cost Impact Increase

CP 28, Section 3.3.5.6, option #1, states:

“1) The code change proposal will increase the cost of construction;”

The first option requires the proponent of a code change to explain the basis for the increase in the cost of construction. This requirement focuses on the “cost of construction,” however there are no limitations to the amount of relevant information a proponent can develop. Examples of additional costs that could impact the cost of construction are: design costs, inspection costs, etc.

Below are some examples to highlight some of the more common mistakes and highlight some of the clear and more transparent statements that can be used.

Original Example 2-1: Less Effective Cost Impact Statement

Costs, however, will be minimal. NFPA 1 and 101 already require new stairs to have 10 foot-candles min. of illumination on the walking surface when the stairs are in use. Chapter 10 already requires exit access stairways, exit stairways, and their landings to provide 1 foot candle. Energy costs are minimal because the lighting need only be active when the space is in use and automatic dimmers are permitted allowing daylighting to supplement artificial lighting.

The Original Example 2-1 can be identified as an implied cost statement. Implied costs are those that are suggestive or those costs that are not directly expressed in a currency value. These statements merely guesstimate what the proponent of the proposal believes will cost or save monies, but the contents of the statement do not reveal any dollar value costs. Such statements generally make it difficult for the reviewer to comprehend what the proponent is conveying without a dollar value shown. A better example might look like the following:

Revised Example 2-1: Suggested More Effective Cost Impact Statement

Costs will be minimal because the lighting fixtures are required by code to illuminate the walking area, and the active use of the lighting fixtures will only take place when the space or stairs are occupied. The installation of automatic dimmers will be an added cost (estimate \$0.00 per fixture installed cost), however use of dimmers will prevent the lighting from being left on for long periods of time thus reducing long term prolonged energy use.

Original Example 2-2: Less Effective Cost Impact Statement

This requirement may increase the cost as it has not been required to install a ladder [sic] in a under floor access opening or under floor space to date although many just do it anyway in a haphazard way.

Original Example 2-2 is an implied statement it does not discuss any cost based on a dollar value, and it assumes that readers can understand that building owners install ladders because the proponent has indicated as such. The information and reasoning provided in such statements is not always apparent to the reviewer, therefore it is necessary to better elaborate the cost and identify the source of the cost information. For example, 2-2 could read as:

Revised Example 2-2: Suggested More Effective Cost Impact Statement

This requirement will increase the cost of initial construction by requiring the building owner or tenant to install a ladder for underfloor access. Ladders and their accessories have been found to sell on average for \$0.00 per ladder. Installation of these ladders takes roughly (fill in the blank) time to install, and since only one ladder is necessary per space or room where underfloor access is required that would translate to an average of \$0.00 for labor per installation.

The following are three actual examples where Cost Impact Statement information is based on actual construction cost.

Example 2-3.a

This code change proposal will increase the cost of construction. Sprinkler system installation in new construction for a Group A can vary from \$1.00 to \$3.00 per square foot. This proposal will require larger gymnasiums and auditoriums associated with a Group E occupancy to be protected with a fire suppression system in areas where the previous interpretation was to allow these larger spaces to be considered part of the Group E occupancy.

Example 2-3.b

If a state has adopted the IECC 2012 or ASHRAE 90.1 2010, then there is no increase cost of construction. If a state has not adopted IECC 2012 or ASHRAE 90.1 2010, then adding a requirement [sic] for air barrier will increase the cost of construction by approximately [sic] \$4.00 per square foot of area. This cost is offset by reducing both building maintenance [sic] and building repair by an even greater amount over the life of the building.

Example 2-3.c

The representative average price for onsite renewable energy systems as analyzed in 2018 by the ASHRAE 90.1 working group was \$2.50 per installed watt of capacity, before incentives. The workgroup also indicated that the required capacity levels were cost-effective, according to ASHRAE criteria, for buildings in the areas that were subject to the requirement (i.e. not excepted from the requirement).

CHAPTER 3

Cost Impact Decrease

CP 28, Section 3.3.5.6, option #2, states:

“2) The code change proposal will decrease the cost of construction...”

The second option requires the proponent of a code change to explain the basis for the decrease in the cost of construction. This requirement focuses on the “cost of construction,” however there are no limitations to this explanation. Examples of additional costs that could impact the cost of construction include: design costs, inspection costs, etc.

Implied costs are those that are suggestive or those costs that are not directly expressed in a currency value. These statements merely guesstimate what the proponent of the proposal believes will cost or save monies. The contents of the Cost Impact Statement do not reveal how, where or what the costs were derived from. Such statements generally make it difficult for any reader to comprehend the impact.

Below are some examples to highlight some of the more common mistakes and highlight some of the clearer and more transparent statements that can be used.

Original Example 3-1: Less Effective cost impact statement

This change would reduce the cost of construction because the duplication of areas used for single sex facilities can be eliminated saving unneeded floor area.

Original Example 3-1 does not include information about any dollar value cost and implies that the proposal will free up “unneeded” floor area. Unfortunately, a reader will not understand fully the cost aspect because of a lack of information “why” said costs will be lower as well as using jargon like the word “unneeded” which could have multiple interpretations. A more effective way of articulating the cost intent is suggested below:

Revised Example 3-1: Suggested More Effective cost statement

The proposed code change will reduce the cost of construction for the following reasons; the proposed requirements reduce the number of water closets needed for a unisex rest room design when compared to the traditional two sex design; the cost of construction will be lower because less area will be required by the unisex rest room design when compared to the traditional two sex rest room design; and with less fixtures so too will the cost of labor be lower to construct same when compared to the traditional two sex rest room design.

While the above does not mention a dollar value for construction, it represents one example where the reader is guided through the thought process and the analysis as an explanation for the decrease for the cost of construction. This can be helpful to the reviewer to understand the source for the decrease in construction cost.

Original Example 3-2: Less Effective Cost Impact Statement

Elimination of unnecessary and confusing language may result in cost reductions where the imaginary line was erroneously applied.

Original Example 3-2 statement includes terms such as “unnecessary” and “confusing” however does not adequately explain why. One solution would be to provide further information how and why the subject code provision was a problem, as follows:

Revised Example 3-2: Suggested More Effective Cost Impact statement

Any cost impact will be through the user of the code understanding the application and intent when reading the provision the first time. The revisions to the text of the code will not increase or decrease the cost of construction as the technical intent and content of the code remains intact and unaltered.

The following are two examples where Cost Impact Statement information identifies specific construction costs. Notice the cost impact statements clearly explain the thought process and also assign a dollar value based on a recognizable metric to explain the impact.

Example 3-3.a

This code change will significantly reduce the cost of construction. A rough installed cost estimate for the smoke dampers and associated required equipment can range from \$2000-\$3000 per damper or even more for large dampers. This does not include the ongoing cost of testing the dampers and detectors that are required to operate the dampers. Regular testing is also required at regular frequencies. Testing costs per damper can vary depending on the number of dampers being tested and the accessibility and complexity of the system.

Example 3-3.b

By eliminating unnecessary hot water branch piping insulation, this proposal will reduce the cost of plumbing by \$200 – \$300 per unit for a typical two-bathroom apartment.

CHAPTER 4

Cost Impact Neutral

CP 28, Section 3.3.5.6, option #3 states:

“3) The code change proposal will not increase or decrease the cost of construction.”

The third option requires the proponent of a code change to explain the basis for no increase or no decrease to the cost of construction. This option has been traditionally reserved for code change proposals that can be considered as having no technical impact to the subject code provision. These subjects may include changes to the code that:

- modify the design requirements (e.g. greater number of design options, design process efficiencies), but do not affect the construction or construction cost,
- modify the title of a reference standard within the provision to be consistent with another code change,
- reformat the code provision from a single paragraph requirement to a provision which uses multiple subparts, but does not change the technical content or intent of the provision,
- change the grammar, but not the technical requirements, or
- involve other modifications that could change the technical content or intent of the provision.

Below are examples to highlight some of the more common mistakes and highlight some of the clearer and more transparent statements that can be used.

Original Example 4-1: Less Effective Cost Impact Statement

This is an editorial reorganization to place requirements in a more appropriate location.

The Original Example 4-1 Original is not adequate as it assumes the information and reasoning is apparent to the reviewer where it may not be. In this case, it is unclear why moving requirements is only editorial and what makes the relocation of provisions more appropriate. It should also be noted that by moving a code provision from one place to another could constitute a technical change. Therefore, it is advised that additional language be included to state why said relocation will not modify the code change provisions technically. A clearer statement might read:

Revised Example 4-1: Suggested More Effective Cost Impact Statement

This proposal rearranges the provisions into a logical order based on the traditional method of design and construction. There is no change to the technical content of the provisions. By modifying the section numbers and titles only there will be no cost impact when approving this proposal.

The following examples illustrate errors in cost impact statements that should be avoided. The errors in these examples include:

1. The substantiation only cites what action took place and does not clearly and unambiguously articulate why there is a neutral cost impact.
2. The statement is ambiguous. Statements should aim to be precise and not ambiguous.
3. Terms such as “anticipated” and “clarification” should be avoided. The use of such terms can lead to multiple interpretations by reviewers.
4. If terms such as “impact” are used, then the writer needs to quantify what specifically the numerical order of magnitude such item represents.

Example 4-2a:

“This is simply a clarification of the requirements. There will be no cost impact.”

Example 4-2b

“There is no anticipated cost increase or decrease for this clarification.”

Example 4-2c

“No cost impact.”

CHAPTER 5

Bibliography

The bibliography provisions are designed to provide the opportunity to any proponent to provide additional materials that support the code change proposal. These provisions are optional. However, the bibliography provisions are designed so that if a proponent wishes to include additional published information there is a policy indicating how one may so provide such information.

It should be noted that material listed in the “bibliography” can be applicable to the both “cost impact” statement and the “reason” statement.

Council Policy 28 states:

“3.3.5.4 Bibliography: *The proponent shall submit a bibliography of any substantiating material submitted with the code change proposal. The bibliography shall be published with the code change proposal and the proponent shall make the substantiating materials available for review at the appropriate ICC office and during the public hearing. Supporting documentation may be provided via a link to a website provided by the proponent and included in the bibliography. The reason statement shall include the date the link was created.”*

Bibliographical items can include the following and can include information that either reinforces a reason statement, reinforces a cost impact statement, or both.

- Research reports,
- Quantity surveyor or cost data reports,
- Published Papers or other information that are relevant to the subject of the proposal (Note: Proponents should cite copyright information about each item so listed),
- Surveys,
- Etc.

CHAPTER 6

Conclusion

The ICC Cost Impact Guide is presented to provide direction on the preparation of cost impact statements for code change proposals as required by ICC Council Policy #28 (CP-28) provisions.

While this document is intended to assist proponents in properly identifying the cost impact and substantiating how the code change proposal will impact the cost of construction, additional resources may exist outside of this ICC Cost Impact Guide. Such resources may further assist in determining and substantiating effective methods for developing reasoning statements and aspects of code change proposals other than cost impact statements. Regardless of the resources consulted, code change proposals should conform to the rules and regulations of CP-28. It should be noted that code change proposals are subject to the discretion of the code development committees and the governmental members.

APPENDIX - A

Additional Cost Subjects

Appendix A discusses subjects for consideration that are in addition to the CP 28 cost impact statement minimum requirements.

The family of I-Codes addresses various aspects of design and construction requirements. The scope of each I-Code reveals the intent of the code and how it is to function. Listed below are each of the individual scopes. These are reprinted for the benefit of understanding the nuances which are further elaborated in the content of the I-Codes.

In addition, included are brief descriptions of example subjects of how a cost impact statement may include or address other benefits related to cost impact for reference. While not an exhaustive list of examples, this listing is designed to guide the user on other subjects related to cost impact subjects.

International Building Code-2021

Scope:

“The purpose of this code is to establish the minimum requirements to provide a reasonable level of safety, health and general welfare through structural strength, means of egress, stability, sanitation, light and ventilation, energy conservation, and for providing a reasonable level of life safety and property protection from the hazards of, explosion or dangerous conditions, and to provide a reasonable level of safety to fire fighters and emergency responders during emergency operations.”

Other Benefit Examples for Cost Impact Statements:

Fire Resistance, Fire Suppression, and Type of Construction – Long term benefits of passive and active fire protection for the life of the building, and benefits to first responders.

Means of Egress - Initial and long-term cost benefits of improved safety requirements that will prevent, reduce or mitigate injuries or reduce deaths plus, to a much greater degree provide for normal use of facilities which is a strong indicator of such facilities’ usability and effectiveness in emergency conditions (i.e. Relationship between normal and emergency use).

Resilience – Benefits of construction which address the capacity for a building to absorb, recover, and successfully adapt to or from events.

International Fire Code-2021

Scope:

“The purpose of this code is to establish the minimum requirements consistent with nationally recognized good practice for providing a reasonable level of life safety and property protection from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises, and to provide a reasonable level of safety to fire fighters and emergency responders during emergency operations.”

Other Benefit Examples for Cost Impact Statements:

Fire Safety – Initial and long-term cost benefits of new systems that will positively impact first responders at an incident in addition to fire and life safety.

Construction Safety – Cost benefits outlining safety oversight mechanisms during construction that will mitigate long term catastrophes, such as the loss of the project during construction.

International Existing Building Code-2021

Scope:

“The intent of this code is to provide flexibility to permit the use of alternative approaches to achieve compliance with minimum requirements to provide a reasonable level of safety, health, property protection, and general welfare insofar as they are affected by the repair, alteration, change of occupancy, addition and relocation of existing buildings.”

Other Benefit Example for Cost Impact Statements:

Streamlined process – Creation of provisions which address health, safety and welfare of the occupants while at the same time are published in an effective and concise manner.

International Residential Code-2021

Scope:

“The purpose of this code is to establish minimum requirements to provide a reasonable level of safety, health and general welfare through affordability, structural strength, means of egress facilities, stability, sanitation, light and ventilation, energy conservation and safety to life and property from fire and other hazards attributed to the built environment, and to provide a reasonable level of safety to fire fighters and emergency responders during emergency operations.”

Other Benefit Examples for Cost Impact Statements:

QA/QC – Initial and long-term benefits of improved building design and construction that will mitigate the operation and maintenance costs over the life of the building.

Resilience – Benefits of construction which address the capacity for a building to absorb, recover, and successfully adapt to or from events.

International Energy Conservation Code-2021

Scope:

“This code shall regulate the design and construction of buildings for the effective use and conservation of energy over the useful life of each building. This code is intended to provide flexibility to permit the use of innovative approaches and techniques to achieve this objective. This code is not intended to abridge safety, health or environmental requirements contained in other applicable codes or ordinances.”

Other Benefit Example for Cost Impact Statements:

Energy and Sustainability – impact of initial cost of construction and long-term operation costs (i.e. building envelope, mechanical, etc.) since those assemblies and components will be unchanged for decades thus allowing greater efficiency over time (e.g. life cycle assessment),

International Plumbing Code-2021

Scope:

“The purpose of this code is to establish minimum requirements to provide a reasonable level of safety, health, property protection and general welfare by regulating and controlling the design, construction, installation, quality of materials, location, operation and maintenance or use of plumbing equipment and systems.”

Other Benefit Examples for Cost Impact Statements:

Management of risks – System designs that monitor and manage biological and bacterial growth in building plumbing systems in order to prevent occupants or in habitants from contracting diseases or infections.

Water conservation – Identifying product and system designs that use water more efficiently and effectively, and thus are beneficial to the environment.

International Private Sewage Disposal Code-2021

Scope:

“The purpose of this code is to establish minimum requirements to provide a reasonable level of safety health, property protection and general welfare by regulating and controlling the design, construction, installation, quality of materials, location, operation and maintenance or use of private sewage disposal systems.”

Other Benefit Example for Cost Impact Statements:

Advanced Treatment Systems – Implementation of non-soil based septic systems which disturb the existing landscape less, process the effluent more effectively, and reduce the impact to the existing environment.

International Swimming Pool and Spa Code-2021

Scope:

“The purpose of this code is to establish minimum requirements to provide a reasonable level of safety and protection of health, property and public welfare by regulating and controlling the design, construction, installation, quality of materials, location and maintenance or use of pools and spas.”

Other Benefit Examples for Cost Impact Statements:

Long Term Safety – New design options which increase the long-term safety, and reduce the number of injuries, for the users of the pools and spas.

Sustainability and Energy Efficiency – Impact of mechanical design features which use less energy or water thus creating a more environmentally sustainable system.

International Mechanical Code-2021

Scope:

“The purpose of this code is to establish minimum requirements to provide a reasonable level of safety, health, property protection and general welfare by regulating and controlling the design, construction, installation, quality of materials, location, operation and maintenance or use of mechanical systems.”

Other Benefit Examples for Cost Impact Statements:

Indoor Environmental Conditions - Outlining how new designs or technologies will improve the indoor environmental conditions for occupants.

Energy conservation - Identifying the attributes of new technologies which conserve the use of water, energy and reduce the operational carbon footprint.

International Fuel Gas Code-2021

Scope:

“The purpose of this code is to establish minimum requirements to provide a reasonable level of safety, health, property protection and general welfare by regulating and controlling the design, construction, installation, quality of materials, location, operation and maintenance or use of fuel gas equipment or systems.”

Other Benefit Examples for Cost Impact Statements:

Increased level of safety - New design options of new technology which offer greater level of safety to users and the general public.

QA/QC – Initial and longer-term benefits of improved building design and construction that will mitigate the operation and maintenance costs over the life of the building.

International Wildland-Urban Interface Code-2021

Scope:

“The purpose of this code is to establish minimum regulations consistent with nationally recognized good practice for the safeguarding of life and for property protection. Regulations in this code are intended to mitigate the risk to life and structures from intrusion of fire from wildland fire exposures and fire exposures from adjacent structures and to mitigate structure fires from spreading to wildland fuels. The extent of this regulation is intended to be tiered commensurate with the relative level of hazard present.”

Other Benefit Examples for Cost Impact Statements:

Fire Safety – Initial and long-term cost benefits of new systems that will positively impact first responders at an incident in addition to fire and life safety provisions.

Resilience – Long term cost impact of a building or structure that can withstand the impact of a wildfire and continue to be operational or continue to be habitable following such an event.

ICC Performance Code-2021

Scope:

“The purpose of this code is to provide an acceptable level of health, safety, and general welfare and to limit damage to property from events that are expected to impact buildings and structures.”

Other Benefit Examples for Cost Impact Statements:

Effectiveness – Impact of more effective methods from which to evaluate and determine the quality of the level of the building or structures performance.

QA/QC – Initial and longer-term benefits of improved building design and construction that will mitigate the operation and maintenance costs over the life of the building.

Resilience – Long term cost impact of a building or structure that can withstand the impact of a natural disaster and continue to be operational or continue to be habitable following such an event with a minimized recovery period.

International Property Maintenance Code-2021

Scope:

“The purpose of this code is to establish minimum requirements to provide a reasonable level of health, safety, property protection and general welfare insofar as they are affected by the continued occupancy and maintenance of structures and premises. Existing structures and premises that do not comply with these provisions shall be altered or repaired to provide a minimum level of health, safety and general welfare as required herein.”

Other Benefit Examples for Cost Impact Statements:

Increased Clarity – Long term cost impact of creating clear and concise provisions for a more effective enforcement of the code.

Safe Environment – Impact of provisions which improve the environment of a dwelling and of neighboring dwellings.

International Zoning Code-2021

Scope:

“The purpose of this code is to establish minimum requirements to provide a reasonable level of health, safety, property protection and welfare by controlling the design, location, use or occupancy of all buildings and structures through the regulated and orderly development of land and land uses within this jurisdiction.”

Other Benefit Example for Cost Impact Statements:

Administrative Enforcement – Impact of more effective and efficient mechanisms for executing due process of law and equal protection under the law.

APPENDIX - B

Sound advice

The proponent of any code change proposal is responsible for developing and defending their proposal. This means that any information provided will need to be accurate and justifiable as part of the ICC code development process in order to convince other parties who are evaluating the proposal that it should be approved in order for it to be incorporated into the relevant I-Code. Some necessary considerations to make when writing a cost impact statement include:

Consider the following:

1. Do provide a clear and unambiguous statement(s).
2. Do provide the basis for the cost (e.g. how calculations were made, resources used, studies, research, etc.)
3. Do provide a relationship between the “reason” statement and the “cost impact” statement as these two categories are mutually dependent.
4. Do double check proposal(s) before submission (i.e. grammar, typographical issues).
5. Do present clearly all financial and economic consequences in a form that can be understood by intended audience.
6. Do include for each code change proposal the Cost Impact Category Title.

Avoid the following:

1. Do not repeat/include the entire Cost Impact Statement.
 - a) Include the Cost Impact Category Title.
2. Do not use run-on sentences (double check your work).
3. Do not use poor grammar.
4. Do not say it is “editorial” or “for clarification”.
 - a) If “editorial” or “for clarification” clearly explain why.