



**International Code Council**  
500 New Jersey Avenue, NW  
Sixth Floor  
Washington, DC 20001  
t: 888.ICC.SAFE (422.7233)  
t: 202.370.1800  
f: 202.783.2348  
[www.iccsafe.org](http://www.iccsafe.org)

March 30, 2020

Christopher C. Krebs  
Director  
Cybersecurity and Infrastructure Security Agency  
Department of Homeland Security  
245 Murray Lane  
Washington, D.C. 20528-0380

Dear Director Krebs:

The International Code Council, through its 65,000 governmental and construction industry members, stands ready to assist state, local, tribal, and territorial (SLTT) governments as well as the federal government in confronting the COVID-19 pandemic. The Code Council's mission is to protect the health, safety, and welfare of people by creating safe buildings and communities.

On March 28, the U.S. Department of Homeland Security Cybersecurity and Infrastructure Security Agency released an updated list of "Essential Critical Infrastructure Workers" to help inform community decision-making to determine critical functions that should continue normal operations in light of the COVID-19 pandemic. Appropriately, that list recognizes workers who:

- administer "the permits and inspections for construction supporting essential infrastructure," and "support the operation, inspection, and maintenance of essential public works facilities;"
- support "the construction of housing, including those supporting government functions related to the building and development process, such as inspections, permitting and plan review services that can be modified to protect the public health, but fundamentally should continue and serve the construction of housing;"
- "support the supply chain of building materials from production through application/installation . . . and employees who provide services that enable repair materials;"
- "ensure continuity of building functions" and provide "fire, monitoring and life safety services;"
- "support weather disaster / natural hazard mitigation and prevention activities;"
- "can coordinate the response to emergency 'at-home' situations requiring immediate attention;" and
- who are "plumbers, electricians, exterminators, builders, contractors, HVAC Technicians, landscapers, and other service providers who provide services that are necessary to maintaining the safety, sanitation, and essential operation of residences, businesses and buildings such as hospitals, senior living facilities, [and] any temporary construction required to support COVID-19 response."

Simply stated, SLTT building and fire prevention departments are essential. These code officials ensure that healthcare infrastructure, including temporary structures and occupancies, are built and maintained to ensure occupant safety. They enforce SLTT and federal regulations that require adequate ventilation through mechanical systems, and safe and sanitary plumbing systems, including water,



**International Code Council**  
500 New Jersey Avenue, NW  
Sixth Floor  
Washington, DC 20001  
t: 888.ICC.SAFE (422.7233)  
t: 202.370.1800  
f: 202.783.2348  
[www.iccsafe.org](http://www.iccsafe.org)

sanitary drainage, and medical gas systems. They also ensure healthcare centers are structurally sound, a critical function given reports of a facility collapsing and the call for temporary healthcare facilities to create additional medical surge capacity. Code officials and property maintenance officials inspect existing infrastructure, including plumbing, mechanical, and ancillary systems, to verify that they are being maintained in a safe and sanitary condition within their original design parameters. More broadly, code officials protect the health and welfare of building occupants when dangerous or unsafe sanitary, air quality, structural, or electrical hazards arise.

Building and fire prevention department functions, including inspections, permitting, and plan review services, can and are being modified to protect the public health. But they must continue. SLTT and federal governmental partners can aid this work by investing in technology solutions that allow departments to provide these essential services remotely. Recently advanced federal legislation supporting mitigation efforts by federal and SLTT governments—through a \$150 billion allocation to the SLTT Coronavirus Relief Fund, a \$45 billion allocation to FEMA's Disaster Relief Fund, and a \$5 billion allocation to the Community Development Block Grant program, should be leveraged to support these investments. They both address near-term health concerns and, in the longer term, will promote faster, more efficient, and less expensive construction. The Code Council has aggregated several departmental best practices and software solutions at [www.iccsafe.org/advocacy/coronavirus-response-center](http://www.iccsafe.org/advocacy/coronavirus-response-center).

The construction industry is also vital to our nation's response to the coronavirus. Without it, needed healthcare infrastructure cannot be built, modernized, and maintained. Unsafe building conditions cannot be remedied, and efforts to increase the resilience of millions of structures that face natural hazard risks cannot advance. The construction industry is essential to an effective response to the COVID-19 pandemic and maintaining economic activity during the pandemic. It will be even more critical to the recovery that follows.

As you take action to protect our citizens and communities, the Code Council asks that you recognize building and fire prevention departments, and construction critical to our pandemic response and our nation's resilience, as constituting essential activities that protect public safety and can be provided with the necessary precautions to protect the public and workers during this pandemic.

Sincerely,

Dominic Sims  
Chief Executive Officer  
International Code Council