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Report on the Code Development Process 2019 Group B Cycle

April 8, 2020



REPORT ON THE CODE DEVELOPMENT PROCESS 2019 GROUP B CYCLE

TABLE OF CONTENTS

EXECUTIVE SUMMARY	<u>3</u>
REPORT	<u>4</u>
THE CODE DEVELOPMENT PROCESS	<u>4</u>
CERTIFICATION OF RESULTS	<u>5</u>
THE VALIDATION COMMITTEE REPORT	<u>5</u>
AN ISSUE PRESENTED TO THE VALIDATION COMMITTEE	<u>6</u>
STAFF FINDINGS	<u>6</u>
THE VOTER VALIDATION PROCESS	<u>7</u>
THE VOTING PROCESS	<u>8</u>
BOARD DETERMINATION	<u>8</u>
APPENDIX A: 2019 CYCLE VOTERS	<u>A-1</u>
APPENDIX B: DEFINITIONS AND WEBSITE LINKS	<u>B-1</u>
APPENDIX C: 2019 GROUP B CODE DEVELOPMENT SCHEDULE	<u>C-1</u>
APPENDIX D: VOTER VALIDATION TIMELINE	<u>D-1</u>
APPENDIX E: VOTING GUIDES	<u>E-1</u>



EXECUTIVE SUMMARY

The purpose of this document is to report the facts and findings of the process and results of the International Code Council's 2019 Group B code development cycle. Code Council staff, third-party auditors and the Validation Committee reviewed the process thoroughly. While a significant majority of participants have expressed confidence in the process, this report addresses all the issues identified by concerned participants. As noted below, some of these issues are not part of the validation process but are identified for further study.

Eligibility of voters: Questions have been raised about the eligibility of voters in the 2019 Group B cycle in terms of (i) whether entities met the definition of a governmental member (GM) or governmental member voting representative (GMVR) as set forth in the Code Council bylaws, and (ii) if they applied within the deadlines. Code Council staff performed a comprehensive review of all GMs and GMVRs who participated in the 2019 Group B cycle and determined all GM and GMVR applications met the Code Council bylaws definitions, and that the overwhelming majority of applications and GMVR designations were submitted on time. Of note, during the voter validation process, individuals put forth by the GM that did not meet the bylaws definition were rejected. Of the 124 new GM applications for the 2019 Group B cycle, Code Council staff identified two GM applications that did not meet application deadlines. Staff determined that votes cast by these two were not material to the outcomes.

Results of the Public Comment Hearings (PCH) overturned: The PCH action on 37 code changes was overturned by the online governmental consensus vote (OGCV). These overturns occurred on energy related code changes, including 20 which were disapproved at both the Committee Action Hearings (CAH) and the PCH. Historically, PCH actions have been overturned by the OGCV since its inception in the 2014 cycle. However, the scenario of the 20 code changes has not occurred previously; nonetheless, such a voting result is not a violation of the code development process per Council Policy 28 (CP 28).

Cost impact: Proponents of a code change are required to identify and substantiate the cost impact of their proposals. Further consideration and debate of the cost impact is integral to the CAH and PCH. Ultimately, the decision rests with the eligible voting members on the cost effectiveness of the code change. Assessment of the procedures for cost impact is not part of the validation process but will be reviewed (see "Further study" below).

Voter guides: This report notes that voter guides developed by participants/stakeholders have been in existence since the creation of the Code Council and prior with the legacy organizations. They are not a violation of CP 28. The Code Council Board of Directors has directed the Board Committee on the Long Term Code Development Process to review the issue of voter guides as part of their effort (see <u>Appendix E</u>).

Scoping: Both opposition and support of two energy related code changes has been raised relative to the changes being within the scope of the International Energy Conservation Code and the International Residential Code. These code changes were processed and included in the cycle for membership review and evaluation given they were related to energy conservation. Further assessment of scope is not part of the validation process but is subject to appeal in accordance with Section 12.1 of CP 28.

Further study: The Code Council Board of Directors established the <u>Board Committee on the Long Term Code</u> <u>Development Process</u> after the 2018 cycle. Consideration of issues resulting from this 2019 code development cycle will be compiled and placed before the committee for review and report to the Code Council Board.



REPORT

The International Code Council's code development process is consensus-based and founded on principles of due process and transparency. This process meets the principles defined by the *National Standards Strategy of 2000* and the Office of Management and Budget Circular A-119, *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities* (1998). It complies with Public Law 104-113 *National Technology Transfer and Advancement Act of 1995*.

In the interest of transparency and inclusiveness, the Code Council has compiled this report with the simple objective of making sure that all stakeholders are provided the necessary information in order to review the specific details of the 2019 Group B cycle and be confident in its outcome.

THE CODE DEVELOPMENT PROCESS

The International Code Council code development process is the mechanism by which the International Codes (I-Codes) are updated every three years. The I-Codes are the most widely used and adopted set of building safety codes in the world.

The Code Council serves as the facilitator of the code development process. A complete code cycle consists of two individual cycles – known separately as the "Group A" or "Group B" cycle – each lasting approximately one year. The key steps in each individual code change cycle are the following:

- Code change submittals
- Committee Action Hearings (CAH)
- Online CAH assembly floor motion vote
- Public comment submittals
- Public Comment Hearings (PCH)
- Online governmental consensus vote (OGCV)
- Validation process
- Code Council Board of Directors review and action
- Posting of final actions
- Correlation of text and publication

The Code Council is currently updating the 2018 I-Codes to the 2021 editions. The process is governed by <u>Council Policy 28</u> (CP 28) *Code Development* and the <u>Bylaws for the International Code Council, Inc</u>. In addition to governing the code development process, CP 28 also provides guidance on the process for appeals.

The Code Council completed the Group A cycle in 2019. The Group B cycle is in the final stages. The 2021 International Plumbing Code and International Mechanical Code were published in March 2020. Publication of the other 2021 I-Codes is scheduled for October 2020, except the 2021 International Green Construction Code which is scheduled for early 2021.

This report outlines the Group B cycle validation process, including formal actions taken by the Validation Committee appointed by the Code Council Board of Directors.





CERTIFICATION OF RESULTS

The validation process is conducted in accordance with Section 10.1 of CP 28 and requires the establishment of an independent Validation Committee that, "shall report the results to the ICC Board, either confirming a valid voting process and result or citing irregularities in accordance with Section 10.2 [of CP 28]."

The validation process entails the following:

- Third-party independent audit of the OGCV by the external auditors, BDO and Fort Sheridan Group.
- Review by the Board-appointed Validation Committee.
- Validation Committee report to the Code Council Board of Directors.
- Board review and action.

The role of the third-party independent auditors is to evaluate the veracity and integrity of cdpACCESS, including:

- Confirmation that only eligible voters were given voting privileges via the log-on system.
- Import of PCH actions to the OGCV.
- Accuracy of OGCV vote tallies.
- Security risk assessment from hackers.
- Identification of security flaws, if any.
- Confidentiality.
- Completeness.
- Functionality.
- Monitor the open and close of the ballot period.

As part of the normal process, the Code Council, assisted by the third-party auditors, conducted an audit and review and submitted the results to the Validation Committee.

THE VALIDATION COMMITTEE REPORT

The Group B cycle Validation Committee was appointed by the Code Council Board of Directors during its December 5, 2019, meeting. It is comprised of experienced participants in the code development process, including industry representatives and governmental members. The members of the Validation Committee are:

- John Catlett, Building Owners and Managers Association
- Craig Drumheller, National Association of Home Builders
- Mae Drzyga, Dupont
- Bill Dupler, Code Council Past President and Chesterfield County, VA (retired)
- Steve Thomas, City of Cherry Hills, Colo.

The first meeting of the Validation Committee was held on January 15, 2020. The meeting included the Validation Committee, Code Council staff, and representatives of the third-party auditors. The auditors presented their findings on the security and integrity of the OGCV platform and answered questions from the Validation Committee. Following the presentations, the Validation Committee passed a motion to accept the audit reports which confirmed that the platform worked correctly and was secure and free from malicious errors.



On March 20, 2020, the Validation Committee again met and passed the following motion:

In accordance with Section 10.1 of Council Policy (CP) 28 and the ICC Bylaws, the Validation Committee reviewed the 2019 Group B Validation Committee Packet during their January 15, 2020, conference call followed by the review of the staff report entitled "ICC Report to the Validation Committee" on their March 20, 2020, conference call. These two calls and review documents related to the 2019 Group B Code development cycle online governmental consensus vote, conducted November 18 – December 6, 2019. Having found no irregularities or concerns material to the outcome of the voting process, the Validation Committee hereby certifies the results of the online governmental consensus vote and confirms a valid voting process for the 2019 Group B code development cycle.

The motion was approved unanimously.

In addition, the Validation Committee noted a specific correlation between a single voting guide and the final vote on energy code changes. The Validation Committee further stated that no additional voting guides were investigated. By a vote of 3 to 2, the committee agreed to convey the noted information to the Code Council Board of Directors.

AN ISSUE PRESENTED TO THE VALIDATION COMMITTEE

Subsequent to the posting of the preliminary results from the OGCV on December 19, 2019, parties involved in the code development process raised concerns involving the voter validation process for a segment of twenty energy code changes. A list of letters – including those in support of the process – are available at www.iccsafe.org/validation-committee. The specific code changes are identified in a letter received from Thomas Zaremba.

As part of its obligation as defined in CP 28, the Validation Committee in January directed staff to investigate whether voting members participating in the OGCV were fully and correctly reviewed and vetted in accordance with written Code Council policies and bylaws as they relate to the identified code changes. All twenty of the identified code changes were disapproved at both the CAH and PCH and approved as submitted during the OGCV.

The Validation Committee cited its obligation to investigate any inference of potential voting irregularity as outlined in Section 10.2 of CP 28 and the content of the Zaremba letter as its basis for requesting further investigation.

STAFF FINDINGS

As requested by the Validation Committee, Code Council staff performed a comprehensive analysis of the twenty identified code changes. In addition, staff performed an analysis of the entire 2019 Group B cycle of all 388 code changes considered at the PCH and then the OGCV. The 2019 Group B analysis is reflected in Appendix A of this report and included a review of the following:

- Governmental member (GM) and governmental member voting representative (GMVR) compliance with the definitions set forth in the bylaws.
- GM/GMVR compliance with application deadlines.

The staff report also provided findings relative to "voting irregularities" cited in the Zaremba letter.

Governmental Members Compliance with Bylaws

Code Council staff reviewed the records of 124 new 2019 applications from GMs that participated in Group B for compliance with the definition listed in Section 2.1.1 of the bylaws.

Staff determined that all 124 applicants met the bylaws definition.

Governmental Members Compliance with the Application Deadline

Code Council staff reviewed the GM applications for compliance with the established deadline of March 29, 2019. The deadline was established in accordance with Section 9.2 of CP 28.



Staff found that the overwhelming majority of new governmental member applications from GMs who participated in Group B complied with the deadline, with three exceptions.

The GM application deadline was Friday, March 29. At office opening on Monday, April 1, 2019, an application from outside the Central Standard Time Zone was discovered as having arrived over the weekend after the deadline. Staff had discussions with the applicant and determined that a good faith effort had been made to meet the deadline and that a difference in time zones exacerbated the difficulty the GM was experiencing in attempting to comply with the deadline. Therefore, the application was accepted as timely.

Staff found two other GMs who did not meet the application deadlines for the 2019 Group B cycle. Staff determined that votes cast by these two were not material to the outcome of the final action vote on code changes voted on as stipulated in Section 10.2 of CP 28.

GMVR Compliance with Bylaws

Code Council staff reviewed the record of 2,026 governmental member voting representative applications from GMVRs who participated in Group B for compliance with the definition listed in Sections 2.1.1.1 of the bylaws.

Staff found that all the applicants who participated in Group B met the bylaws definition.

GMVR Compliance with the Application Deadline

Code Council staff reviewed the GMVR applications from GMVRs who participated in Group B for compliance with the established deadline of September 23, 2019. The deadline was established in accordance with Section 9.2 of CP 28.

Staff found that all the applications were received in compliance with the deadline.

Voting Irregularities

The Zaremba letter cited "voting irregularities." A staff review of the OGCV since its inception in 2014 has confirmed that the pattern of voting identified in the letter as an irregularity – disapproved at the CAH, disapproved at the PCH, then passed during the OGCV – has not occurred previous to this current cycle. However, this pattern of voting is not prohibited in CP 28, and this specific scenario is provided for in Section 8.1.

Section 8.1 notes that where the action is disapproval at both the CAH and PCH, a two-thirds majority is required to achieve a final action of as submitted. This is what occurred for the 20 code changes identified in the Zaremba letter.

Staff found that no voting irregularities occurred during the 2019 Group B cycle.

THE VOTER VALIDATION PROCESS

The voting process for the 2019 Group B cycle began with the development of an extensive communication schedule which is set up to inform representatives of GMs and potential GMs of all applicable deadlines.

Following receipt of a GM application, staff evaluates the GM for compliance with the bylaws definition of a Code Council governmental member (Section 2.1.1). Some descriptions (e.g. City of X Building Department) clearly comply with the bylaws. Others require research on the jurisdiction's website to confirm the applicant is a complying unit, department or agency. When additional information is necessary to fully evaluate the application, staff contacts (phone or email) the applicant's primary contact to determine the bylaws basis for the application. The primary contact serves as the liaison between the Code Council and the GM.

Each GM is required to identify a primary contact and appropriate GMVRs. The primary contact is the sole point of interface with the Code Council for voter-related coordination and management issues. The primary contact is responsible for designating GMVRs and completing a voter candidate survey for each proposed GMVR.

The voter candidate survey asks for the name, title and email address of the voting candidate and asks two questions regarding how the candidate complies with the bylaws definition of a GM. The primary contact also affirms that the



information is "true and accurate in all respects" and that he/she has "the responsibility as to the accuracy of all statements herein."

A GMVR must comply with Section 2.1.1.1 of the bylaws and satisfy not less than one of the following conditions for both question 1 and 2:

Question 1: The applicant must:

- Administer the laws, ordinances, rules or regulations of this governmental member.
- Formulate the laws, ordinances, rules or regulations of this governmental member.
- Implement the laws, ordinances, rules or regulations of this governmental member.
- Enforce the laws, ordinances, rules or regulations of this governmental member.

Question 2: The applicant must be a:

- Paid employee of the governmental member.
- Third-party contractor of the governmental member.
- Elected official of the governmental member.

The Code Council utilizes its electronic voter validation system (EVVS) to process the applications. The EVVS electronically tracks the date the applications were received as well as the maximum number of GMVRs for which that governmental member is eligible. The primary contact accesses the EVVS by logging in to his/her customized myICC page on the Code Council website. When the login is recognized as the correct email address and password, the option to enter the EVVS appears.

THE VOTING PROCESS

The 2019 Group B Public Comment Hearings (PCH) were conducted in accordance with Section 7.0 of CP 28 and was held in Las Vegas, Nevada, during the period of October 23 – 30, 2019. Only those code changes that received either a public comment or had a successful assembly action following the CAH were considered. Eligible voting members of the Code Council utilized electronic voting devices at the hearings to cast their vote. The required majority for each code change proposal is stipulated in Section 7.6 of CP 28.

Subsequent to the PCH, all electronic votes cast during the hearing were transferred to the OGCV where they were automatically included in the final OGCV voting tally. While participants can change their votes up until the OGCV period ends, each voting representative may only vote once per code change.

On November 18, 2019, staff posted the PCH results. The results served as the basis for the OGCV in accordance with Section 8.1 of CP 28. The OGCV was conducted via <u>cdpACCESS</u> during the period of November 19 – December 6, 2019. Preliminary OGCV results were posted December 19, 2019.

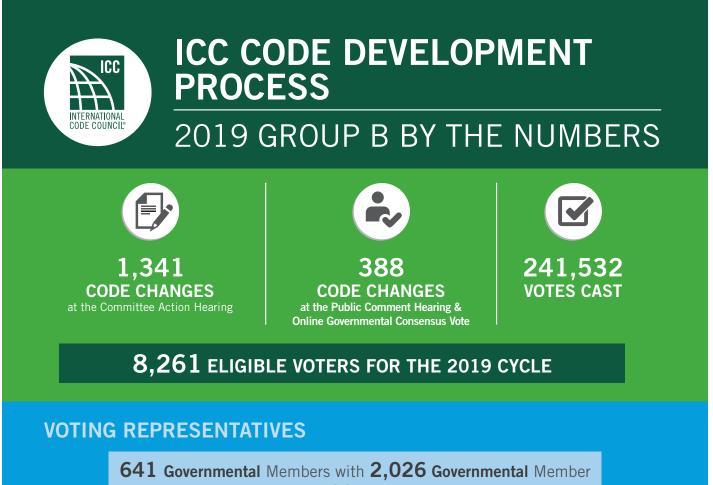
BOARD DETERMINATION

On March 31, 2020, by a unanimous vote, the Code Council Board of Directors certified the results of the OGCV for the 2019 Group B cycle. The board also approved a motion to ask the <u>Board Committee on the Long Term Code</u> <u>Development Process</u> (Blue Ribbon Committee) to examine the use of voting guides in the code development process.



APPENDIX A 2019 CYCLE VOTERS

Given the size of this document, it can be found in a separate file here.



Voting Representatives plus **22** Honorary Members participated



APPENDIX B DEFINITIONS AND WEBSITE LINKS

DEFINITIONS

Appeal: A process defined by Section 12.0 of CP 28 Code Development that addresses the right of any party to appeal an action or inaction in accordance with Council Policy 1 Appeals.

Code Development Cycle: The submission and open discussion of code change proposals by all parties with the final determination of code text by public officials actively engaged in the administration, formulation, enforcement or implementation of laws, ordinances, rules or regulations relating to public health, safety and welfare and by honorary members. The approved code changes from the cycle are incorporated in the subsequent edition of the I-Codes.

Committee Action Hearings (CAH): The first hearing in the code development cycle, held in accordance with Section 5.0 of CP 28.

<u>Council Policy 28</u> Code Development (CP 28): CP 28 prescribes the Rules of Procedure utilized in the continued development and maintenance of the I-Codes. (Section 1.1 of CP 28)

Electronic Voter Validation System (EVVS): The EVVS is the process by which the primary contact of the eligible governmental member designates the governmental member voting representatives he/she wishes to receive voting credentials for the current code development cycle. (Section 9.1 of CP 28)

Eligible Final Action Voters: Eligible final action voters include the Code Council governmental member voting representatives and honorary members in good standing who have been confirmed by the Code Council in accordance with the Electronic Voter Validation System. (Section 9.1 of CP 28)

Governmental Member (GM): Governmental members are confirmed based on compliance with Section 2.1.1 of the bylaws.

2.1.1 Governmental Member – A governmental member shall be a governmental unit, department or agency engaged in the administration, formulation, implementation or enforcement of laws, ordinances, rules or regulations relating to the public health, safety and welfare. Each governmental member shall designate its primary representative who will receive benefits of membership in the Code Council on behalf of the governmental member as determined by the Board of Directors from time to time.

Governmental Member Voting Representative (GMVR): Governmental member voting representatives are eligible voting members of the Code Council as identified by the GM and validated by the Code Council in accordance with Section 2.1.1.1 of the bylaws.

2.1.1.1 Governmental Member Voting Representatives – Each governmental member shall exercise its right to vote through its designated governmental member voting representatives, and shall be entitled to the number of governmental member voting representatives as specified in Table 2.1.1.1. Governmental member voting representatives shall be designated in writing, by the governmental member, and shall be employees or officials of the governmental member or departments of the governmental member, provided that each of the designated voting representatives shall be an employee or a public official actively engaged either full or part time, in the administration, formulation, implementation or enforcement of laws, ordinances, rules or regulations relating to the public health, safety and welfare. The designation of a governmental member voting representative may be changed by the governmental member, in writing, from time to time.

Honorary Member: Honorary members are eligible voting members in accordance with Section 2.1.2 of the bylaws.

Online Governmental Consensus Vote (OGCV): Following the two hearings, the CAH and PCH, this is the third and final step in the code development cycle. The OGCV is conducted in accordance with Section 8.0 of CP 28, with the eligible voters limited to Code Council governmental member voting representatives and honorary members in accordance with Section 9.0 of CP 28.



Public Comment Hearings (PCH): The second hearing in the code development cycle, held in accordance with Section 7.0 of CP 28.

Committee Action		Comment Hearing Result and Majority	Online Governmental Consensus Ballot and Voting Majority			
AS	AS:	Simple Majority	AS:	Simple Majority	D:	Simple Majority
	AMPC:	2/3 Majority	AMPC:	2/3 Majority	D:	Simple Majority
	D:	Simple Majority	AS:	Simple Majority	D:	Simple Majority
AM	AS:	2/3 Majority	AS:	2/3 Majority	D:	Simple Majority
	AM:	Simple Majority	AM:	Simple Majority	D:	Simple Majority
	AMPC:	2/3 Majority	AMPC:	2/3 Majority	D:	Simple Majority
	D:	Simple Majority	AM:	Simple Majority	D:	Simple Majority
D	AS:	2/3 Majority	AS:	2/3 Majority	D:	Simple Majority
	AMPC:	2/3 Majority	AMPC:	2/3 Majority	D:	Simple Majority
	D:	Simple Majority	AS:	2/3 Majority	D:	Simple Majority

Voting Majorities: The voting majorities for the OGCV are noted in the table in Section 8.1 of CP 28 below:

WEBSITE LINKS

2019 Group B Cycle

https://www.iccsafe.org/products-and-services/i-codes/code-development-process/2019-group-b/

Board Committee on Long Term Code Development Process

https://www.iccsafe.org/products-and-services/i-codes/code-development/cs/board-committee-on-long-term-codedevelopment-process/_____

Bylaws and Council Policies

https://www.iccsafe.org/icc-bylaws-and-council-policies/

Code Council Member Voting and Membership Privileges – A Detailed Explanation <u>https://www.iccsafe.org/wp-content/uploads/Comprehensive-Overview-of-Voting-Rights-for-ICC-Members.pdf</u>

Current Code Development Cycle (2018/2019 Cycle)

https://www.iccsafe.org/products-and-services/i-codes/code-development/current-code-development-cycle/

Explanation of Governmental Consensus

https://www.iccsafe.org/products-and-services/i-codes/code-development/code-development-procedures/

Validation Committee

http://www.iccsafe.org/validation-committee



APPENDIX C 2019 GROUP B CODE DEVELOPMENT SCHEDULE

Steps in Code Development Cycle	2019 – Group B Codes Admin, IBC-S, IEBC, IECC-C, IECC-R/IRC-E, IgCC (Ch. 1), IRC-B
DEADLINE FOR cdpACCESS® ONLINE RECEIPT OF CODE CHANGE PROPOSALS	January 14, 2019
WEB POSTING OF "PROPOSED CHANGES TO THE I-CODES"	March 4, 2019
APPLICATION DEADLINE FOR NEW GOVERNMENTAL MEMBERS	March 29, 2019
COMMITTEE ACTION HEARINGS (CAH)	April 28 – May 8, 2019 Albuquerque Convention Center Albuquerque, NM
ONLINE CAH ASSEMBLY FLOOR MOTION VOTE	May 23 – June 6, 2019
WEB POSTING OF "REPORT OF THE COMMITTEE ACTION HEARINGS"	June 11, 2019
DEADLINE FOR cdpACCESS ONLINE RECEIPT OF PUBLIC COMMENTS	July 24, 2019
WEB POSTING OF "PUBLIC COMMENT AGENDA"	September 4, 2019
APPLICATION DEADLINE FOR GOVERNMENTAL MEMBER VOTING REPRESENTATIVES	September 23, 2019 (See Note 1)
PUBLIC COMMENT HEARINGS (PCH)	October 23 – 30, 2019 Rio Hotel & Convention Center Las Vegas, NV
ONLINE GOVERNMENTAL CONSENSUS VOTE (OGCV)	November 19 – December 6, 2019
VALIDATION PROCESS	Following OGCV
WEB POSTING OF FINAL ACTION	Following Validation Committee certification of OGCV and Code Council Board confirmation
PUBLICATION OF 2021 I-CODES	IMC & IPC: March/2020 Other I-Codes (except IMC, IPC, IgCC): October/2020 IgCC: Early 2021

Note 1: In accordance with Section 9.1 of CP 28, GMVR validation is required once per code development cycle. GMVRs validated in 2018 were not required to be revalidated in 2019.



APPENDIX D VOTER VALIDATION TIMELINE

For the 2019 Group B cycle, more than 3,100 GMVR applications were submitted and vetted. The International Code Council has strict application submission deadlines to allow staff to process and vet these applications in advance of the code development hearings. The two application deadlines for 2019 were:

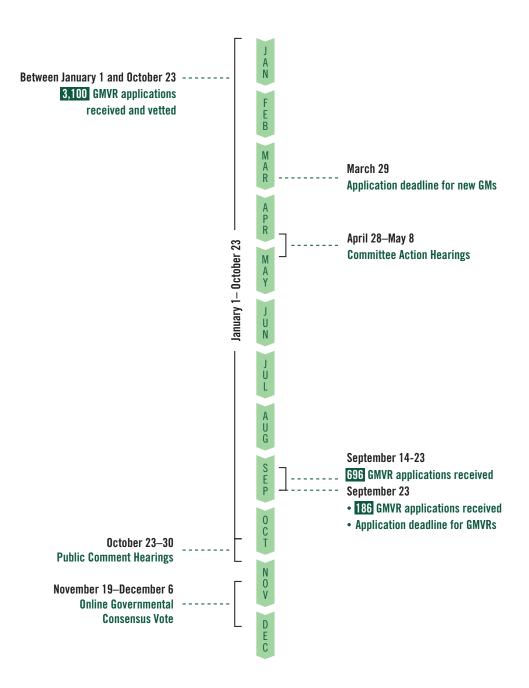
- March 29, 2019: Application deadline for new GMs
- September 23, 2019: Application deadline for GMVRs

In the last ten days before the September 23 deadline, 696 GMVR applications were submitted to staff. On September 23 alone, 186 applications were submitted. The Code Council tracks the application receipt date on each account to ensure the user's voting credentials are recognized as having met all deadlines.

In total, more than 8,000 GMVRs had voting credentials for the 2019 cycle. Note that GMVRs previously confirmed for the 2018 cycle were not required to re-apply in 2019.

Code Council staff carefully reviewed all GMVR applications. On occasion, staff rejected individuals put forth by the governmental member if they did not meet the bylaws definitions.

All eligible GMVRs were validated prior to the start of the Public Comment Hearings on October 23. Once staff completed the validation of a GMVR, the information was automatically populated on the public members lookup webpage.





APPENDIX E VOTING GUIDES

Voting guides have been a part of the International Code Council code development process for a long time. In cycles prior to the online governmental consensus vote (OGCV), voting guides were typically placed on the back table in the room where the final action hearing was conducted. Prior to the OGCV, the final action was determined by a vote of the eligible voting members present and voting. Some guides were also distributed and posted in advance of the hearing.

With the OGCV starting in 2014, voting guides are still in use, often placed in the back of the Public Comment Hearings (PCH) room and distributed/posted in advance of the hearing. Following the action taken at the PCH, voting guides are often updated based on the allowable voting actions that will occur in the OGCV.

Please note: the Code Council does not provide email addresses of its members to the public. Distributions are based on the email addresses known to the organization who developed the guide.

The following is a sampling of voting guides from the past cycles which are located online (accessed April 3, 2020).

2019 CYCLE

- http://content.aia.org/sites/default/files/2019-11/ADV19_ICC%20Voter%20Card_V02_FINAL.pdf
- https://www.awc.org/Code-Officials/2019-group-b-icc-code-changes
- <u>https://www.mapc.org/resource-library/building-codes-climate/</u>
- https://nfsa.org/2019/11/19/2019-ogcv-voting-guidance-for-the-2021-irc-and-iebc/

2018 CYCLE

- https://www.boma.org/BOMA/Building-Codes/CurrentCodeDevelopmentCycle.aspx
- <u>https://www.naahq.org/news-publications/2021-icc-national-model-building-code-voting-guide</u>
- https://www.nmhc.org/advocacy/proposed-legislation-and-regulations/2021-icc-online-voting-guide/

2015 CYCLE

https://www.nahbclassic.org/assets/docs/forms/cdpAccessVotingWebinar21116_20160211013853_77568.pdf



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