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National Integration Center

15-Day National Engagement Period: Mass Care, Public Works, and Geospatial Information System Resource Typing Definitions and Job Title/Position Qualifications

**COMMENTS OF:
THE INTERNATIONAL CODE COUNCIL (ICC)
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The International Code Council (ICC) offers the following comments on **Job Title / Position Description: Structure Condition Evaluator (SCE)**, published by FEMA on June 17, 2013.

Background

The International Code Council (ICC) is a membership association dedicated to building safety, fire prevention, and energy efficiency. The International Codes, or I-Codes, published by ICC, provide minimum safeguards for people at home, at school and in the workplace. Building codes benefit public safety and support the industry's need for one set of codes without regional limitations. Fifty states and the District of Columbia have adopted the I-Codes at the state or jurisdictional level. Federal agencies including the Architect of the Capitol, General Services Administration, National Park Service, Department of State, U.S. Forest Service and the Veterans Administration also use the I-Codes for the facilities that they own or manage. The Department of Defense references the International Building Code for constructing military facilities, including those that house U.S. troops, domestically and abroad. Puerto Rico and the U.S. Virgin Islands enforce one or more of the I-Codes.

The International Code Council (ICC) was established in 1994 as a non-profit organization dedicated to developing a single set of comprehensive and coordinated national model construction codes. The founders of the ICC are Building Officials and Code Administrators International, Inc. (BOCA), International Conference of Building Officials (ICBO), and Southern Building Code Congress International, Inc. (SBCCI). Since the early part of the last century, these non-profit organizations developed three separate sets of model codes used throughout the United States. Although regional

code development was effective and responsive to our country's needs, the time came for a single set of codes. The nation's three model code groups responded by creating the International Code Council (ICC) and by developing codes without regional limitations; the International Codes.

ICC's members are the code officials who adopt and enforce building, fire and energy codes, and the architects, engineers, builders and contractors who build and maintain structures in the built environment. Over 40,000 code officials are active members of the ICC. www.iccsafe.org

Summary

FEMA released 17 resource typing definitions and job title/position qualifications for a 15-day period to allow for national engagement, review and feedback. These definitions address Mass Care, Public Works and Geospatial Information System communities of practice. The guidance contained in these resource types and job title/position qualifications provides a standardized set of criteria for use by the whole community when inventorying resources and working to sustain, or build resources needed to deliver associated core capabilities.

Job Title/Position Description: Structure Condition Evaluator (SCE)

We note that FEMA has recognized in this description ICC's Disaster Response Inspector Program in the training required for all SCE types, and has also referred to "Certified Code Inspection and Enforcement Professional" in the experience requirements for Type 2 and Type 1 SCE's.

Currently, ICC offers two "combination" type certifications that best meet the requirements of these positions: Residential Combination Inspector (RCI) and Combination Inspector (CI). Both of these certifications require testing to insure knowledge in four disciplines reflecting knowledge of the residential building code, plumbing code, mechanical code, and electrical code. Certification as an RCI is awarded by ICC only after the candidate successfully completes tests in each of the four disciplines with a passing grade. In addition, ICC offers what it calls a Combination Inspector certification to those who have passed the same four disciplines required for the RCI certification, and have also passed tests in the same disciplines for Commercial Buildings.

In addition to certification testing services, ICC also offers online and classroom training, training workbooks and learning resources, to individuals and groups on the fundamentals of each of the code disciplines addressed in the four certification tests included in both the RCI and CI categories. ICC is committed to maintaining a robust training program, and the certification program is one of the most popular and widely used programs made available to the ICC's membership of over 40,000 code officials.

The additional visibility of the two Combination Inspector certifications which this proposed job description will provide will likely lead to a 10 to 20% increase in the number of code officials who obtain the Residential Combination or Combination Inspector certification designation.

We believe that both the Residential Combination Inspector and the Combination Inspector certifications should provide more than adequate assurance that the inspector/code official meets the "experience" criteria for a Type 2 SCE, as described in the job title description document. Currently, there are altogether approximately 6,000 individuals who are ICC-certified in these two programs. A recent review of the roster of ICC-certification holders indicated that there are combination inspectors certified in all 50 states, and an adequate number available to meet any need for post-disaster assistance efforts.

We also support inclusion of the ICC Disaster Response Inspector Program in the training requirement for all levels of the SCE title/description.

Information concerning all of the training and certifications offered by ICC, including both online and in-person training and testing, can be found at the following link:

<http://www.iccsafe.org/Edu-Cert/Pages/default.aspx>

We do have some suggestions for the Type 2 description, to make the document consistent internally, as well as to reflect the current reality of building code professionals in the United States.

Our suggestions, and the reason for the suggested modification, are as follows:

TYPE 2, TRAINING - Same as Type 3, Plus: 2. Building Safety Assessment ~~Engineer~~ Professional

REASON: This recommendation is offered since not all licensed or certified code inspection and enforcement professional are engineers

TYPE 2, PROFESSIONAL AND TECHNICAL LICENSES AND CERTIFICATIONS - Same as Type 2, Plus: Currently licensed or certified code inspection and enforcement professional and must be currently certified in American Heart Association (or equivalent) Cardiopulmonary Resuscitation (CPR)

REASON: This recommendation is offered to make sure that licensed or certified code inspection and enforcement professional are identified as a requirement for Type 2

TYPE 2, DESCRIPTION - 3. Assisting Type 1 and 2 US&R Response Engineers, and Type 1 Structure Condition Evaluators ~~Disaster Response Engineers~~ as required from the 'Cold' zone of a disaster scene

REASON: This recommendation is offered since the term Disaster Response Engineer was removed from the balance of this document

TYPE 2, DESCRIPTION - The Type II professional will not be expected to deploy while Rescue operations are still underway. Their role will be post-incident non-emergency assessments for re-occupancy and/or business continuity operations.

REASON: This recommendation is offered to emphasize that the Type 2 and Type 3 Structure Condition Evaluators are not first responders

We hope the comments provided here are helpful, and look forward to continuing the strong partnership between FEMA and the International Code Council in both mitigating the impacts of disasters, as well as responding to and assisting in post-disaster recovery efforts.