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MINNESOTA DEPARTMENT OF
LABOR & INDUSTRY

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September 6, 2007

Legislative Reference Library
645 State Office Building
100 Constitution Avenue
St. Paul, Minnesota 55155

Re: In the Matter of the Proposed Rules of the State Department of Labor and Industry
Governing Construction Code Inspectors, Minnesota Rules, parts 1301.1300 to
1301.1600; OAH Docket No. 3-1900-19163-1; and Governor's Tracking No. AR 294

Dear Librarian:

The Minnesota Department of Labor and Industry intends to adopt rules governing Construction Code Inspectors. We plan to publish a Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received in the September 10, 2007 State Register.

The Department has prepared a Statement of Need and Reasonableness. As required by Minnesota Statutes, sections 14.131 and 14.23, the Department is sending the Library a copy of the Statement of Need and Reasonableness at the time we are mailing our Dual Notice of Intent to Adopt Rules.

If you have any questions, please contact me at (651) 284-5128.

Yours very truly,



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Enclosure: Statement of Need and Reasonableness

Minnesota Department of Labor and Industry

Construction Codes and Licensing Division

STATEMENT OF NEED AND REASONABLENESS

Proposed Rules Governing Construction Code Inspectors, Minnesota Rules, parts 1301.1300 to 1301.1600

INTRODUCTION

The Commissioner of the Minnesota Department of Labor and Industry proposes to amend Minnesota Rules, Chapter 1301, by proposing new rules pursuant to Minnesota Statutes, section 16B.655, which requires this rulemaking. The proposed rules will establish required competency criteria for individuals serving as construction code inspectors, permit the establishment and approval of education programs for construction inspectors related to construction inspection, and establish continuing education requirements for construction code inspectors.¹

In developing these proposed rules, the Commissioner sought the recommendations of an advisory committee, which was comprised of broad interest groups.² The advisory committee met five times to develop and draft these proposed rules. The advisory committee, through either a majority vote or consensus, agreed to recommend the language that is embodied in these proposed rules.

ALTERNATIVE FORMAT

Upon request, this Statement of Need and Reasonableness can be made available in an alternative format, such as large print, Braille, or cassette tape. To make a request, contact Carrie Rohling at the Department of Labor and Industry, 443 Lafayette Road North, St. Paul, MN 55155, e-mail at dli.rules@state.mn.us, telephone (651) 284-5217, or fax (651) 284-5725. TTY users may call (651) 297-4198.

STATUTORY AUTHORITY

The Department's statutory authority to adopt these rules became effective on August 1, 2006, and is set forth in Minnesota Statutes section 16B.655, which provides:

Subdivision 1. **Competency criteria.** The commissioner of labor and industry shall adopt rules establishing required competency criteria for individuals serving as construction code inspectors. For the purpose of this section, "construction code inspectors" means building inspectors, mechanical inspectors, plumbing inspectors, and combination inspectors

¹ The text of Minn. Stat. § 16B.655 appears in the Statutory Authority section.

² See, Exhibit A.

under the supervision of the building official. Required competency criteria shall be relevant to the building, mechanical, and plumbing codes as adopted in Minnesota.

Subd. 2. **Continuing education.** The commissioner of labor and industry shall adopt rules establishing or approving education programs for construction inspectors related to construction inspection and administration of the State Building Code. Each construction code inspector must satisfactorily complete continuing education requirements as established in rule by the commissioner.

Subd. 3. **Exemption.** A person holding current certification as a building official under section 16B.65 is exempt from this section.

Subd. 4. **Effective date.** Effective January 1, 2008, all construction inspectors hired on or after January 1, 2008, shall, within one year of hire, be in compliance with the competency criteria established according to subdivision 1.

Pursuant to Minnesota Statutes, section 14.125, the Department published a notice of intent to adopt rules within 18 months of the effective date of the law authorizing or requiring rules to be adopted. Because the Department's notice of intent to adopt rules published before January 1, 2008, the rulemaking authority has not expired.

Therefore, under Minnesota Statutes section 16B.655, the Department has the necessary statutory authority to adopt the proposed rules.

REGULATORY ANALYSIS

Minnesota Statutes, section 14.131, sets out seven factors for a regulatory analysis that must be included in the SONAR. Paragraphs (1) through (7) below quote these factors and then give the agency's response.

(1) a description of the classes of persons who probably will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule:

The classes of persons who probably will be affected by the proposed rule include individuals who currently act as construction code inspectors, those who desire to become construction code inspectors, and designated building officials and the municipalities that employ construction code inspectors.

The classes of persons who probably will bear the costs of the proposed rule include those who desire to become construction code inspectors and the municipalities that employ them.

The classes of persons who will benefit from the proposed rule include those individuals

and persons that reside in or conduct business in a municipality that employs construction code inspectors, those individuals that serve as construction code inspectors, designated building officials, and municipalities.

(2) the probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues:

There are probable costs to the agency for the implementation of this rule, although the exact costs are difficult to quantify. The Division already conducts courses designed to train inspectors and building officials. The Division recognizes that the implementation of these rules may increase the demand for existing training opportunities for inspectors. Having said that, the Division does not believe that an increase in demand will result in an increase in costs associated with the development of training programs because these costs already exist whether there is one participant or 100.

The Department is likely to incur probable costs related to the approval of educational opportunities provided by other entities due to the staff time involved in reviewing and approving such programs. The estimated annual costs could be anywhere from a few hundred dollars to several thousand, which will depend on the number of training opportunities that are submitted for approval. The Division has estimated the potential cost to range from \$600 to several thousand based on a yearly estimate derived from the cost of residential contracting course approvals currently performed by the Department.

The Division anticipates that municipalities may incur an insignificant increase in costs in that the supervising designated building official, who is an employee of the municipality, will monitor the construction code inspector's compliance with the continuing education requirements of these proposed rules. The Division believes that any implementation costs will be insignificant because municipalities typically include training expectations for the inspectors it has hired.

The Division anticipates that state revenues may be affected because it will offer to provide courses to those individuals that desire to act as construction code inspectors. Although the Department already provides courses for inspectors, the Division believes that demand for these courses may increase with the implementation of these rules. Although the costs of courses provided by the Division are captured in the fee charged for these courses, the Division anticipates that there may be a nominal positive effect on state revenues if there is an increased demand for these courses.

(3) a determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule:

Our Legislature has specifically directed the Department to adopt these rules. As a result, there are no less costly or less intrusive methods for the agency in achieving the purpose of this rule, which is to establish minimum competency criteria, education programs, approval of certain education programs, and establish continuing education requirements for the construction code

inspector.

The proposed rules provide the construction code inspector with several options to demonstrate that they meet the minimum competency criteria established by the proposed rules. The Division believes that providing these options results in the least costly method of achieving the purpose of the proposed rules because individuals can choose the option that most suits their desires and economic resources. The Division also believes that these options represent the least intrusive method for achieving the purpose of the proposed rule in that the construction code inspector is able to make an independent choice regarding their education.

Likewise, the proposed rules provide that the construction code inspector can acquire continuing education from any provider offering an approved course. This will permit the construction code inspector to self-determine the provider, and therefore the cost, of continuing education.

(4) a description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule:

The Legislature directed the Department to adopt rules so no alternative methods were considered. In developing the proposed rules, however, the advisory committee reviewed the Minnesota State Building Code, which is comprised of various rule chapters that adopt national model codes by reference with amendments but these model codes do not include criteria establishing minimum qualifications for construction code inspectors.

The advisory committee also reviewed and considered certifications offered by the International Code Council, which grants certifications for Building Inspectors, Building Officials, and others that rely on testing only. Finally, the advisory committee reviewed and considered models from other states that regulate construction code inspectors,³ Center Point Energy certification for HVAC technicians, the Minnesota Department of Health's certification for sanitarian, and language developed by an advisory committee member.

After review and consideration, the advisory committee determined that these programs do not correlate to the directive given by our Legislature. The advisory committee found the law from other jurisdictions to be cumbersome and at times more restrictive than Minnesota's requirements for certified building officials. As a result, the advisory committee drafted rules, which have been edited by the Department and are embodied in the proposed rules.

(5) the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals:

The proposed rule does not specifically identify who will bear the probable costs of complying with the proposed rule. Although there will be costs involved for the individual who

³ The committee reviewed requirements from Rhode Island and Oregon.

desires to act as a construction code inspector or the municipality who hires them in that there are costs associated with obtaining minimum competencies and acquiring continuing education, the Division has provided flexibility and options in the proposed rules.

There are also probable development costs for those businesses that choose to offer educational opportunities. However, the Division assumes that the cost of developing a course will be recaptured in the fees paid by attendees.

Although it is difficult to quantify actual costs because of the different paths and options there are available to meet the rule, there are general items that are identifiable. First, there are costs associated with meeting the minimum competency criteria. There are many variables to this, and in some instances an individual may already satisfy the criteria, which will result in no additional cost in complying with the proposed rules.

Secondly, a prospective inspector may not have enough experience to meet the minimum criteria upon being hired, and then the individual would need to choose which path to take to comply with the proposed rule. The costs to achieve this could be anywhere from \$170.00 for a qualifying International Code Council exam to several thousand dollars to acquire a bachelor's degree.

Third, is the continuing education that the proposed rule would require, the cost associated with this is difficult to identify since there are many options. The costs associated with the continuing education could vary between \$35.00 for education provided by the Division and several hundred for courses provided by other entities, or relative college classes depending on where the individual chooses to obtain their continuing education.

(6) the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals:

A consequence of not adopting the proposed rules to the agency is losing the authority to adopt these rules. A consequence of not adopting the proposed rules to all others is the potential for a built environment that is inspected by individuals that do not meet minimum competency criteria and on-going continuing education requirements, which the Legislature, by virtue of the law it has enacted, has determined is no longer acceptable.

The Division anticipates that the probable costs of not adopting the proposed rule would be negligible to the agency, the construction code inspector, and the municipality that employs construction code inspectors since minimum competency criteria do not currently exist in Minnesota law. Having said that, a potential cost of not adopting the proposed rule might be the existence of an unsafe building that has passed inspection.

(7) an assessment of any differences between the proposed rule and existing federal regulations and a specific analysis of the need for and reasonableness of each difference:

The Department is unaware of any applicable federal regulation that requires competency criteria or continuing education requirements for the construction code inspector.

PERFORMANCE-BASED RULES

The Department carefully considered the directive of our Legislature. The Division sought the recommendation of an advisory committee so that the input of interested parties would be reflected in the proposed rules. These proposed rules include a variety of mechanisms to accomplish the goal, which is to have the construction code inspector meet a minimum level of competency before engaging in the work of inspecting, and to maintain and grow that minimum level of competency through continuing education so that new methods and technologies can be adequately inspected.

ADDITIONAL NOTICE

This Additional Notice Plan was reviewed by the Office of Administrative Hearings and approved in an August 20, 2007 letter by Administrative Law Judge Sheehy.

We will mail or email the proposed rules and Dual Notice of Intent to Adopt Rules to interested parties. Those parties include all certified building officials. (This includes all municipal building officials that are responsible for the administration of the State Building Code.)

Our notice plan also includes giving notice as required by statute. We will mail the Notice of Intent to Adopt to everyone who has registered to be on the Department's rulemaking mailing lists pertaining generally to all rulemaking related to the construction codes, and specifically to code administration, building official certification, and construction approvals that are maintained pursuant to Minnesota Statutes, section 14.14, subdivision 1a. Those persons include:

- a. The American Institute of Architects - Minnesota
- b. Consulting and inspection firms;
- c. Architects and professional engineers;
- d. Cities, counties, and state agencies;
- e. Contractors;
- f. Labor organizations;
- g. The Builders Association of Minnesota;
- h. The Fire Marshals Association of Minnesota; and
- i. The Minnesota Building Trades Council.

We will also give notice to the Legislature per Minnesota Statutes, section 14.116.

We will also publish the proposed rules, the Statement of Need and Reasonableness, and Dual Notice of Intent to Adopt Rules on the Department's website, which is located at http://www.doli.state.mn.us/rulemaking_activity.html.

CONSULT WITH FINANCE ON LOCAL GOVERNMENT IMPACT

As required by Minnesota Statutes, section 14.131, the Department has consulted with the Commissioner of Finance. We did this by sending Keith Bogut, Executive Budget Officer at the Department of Finance, copies of the documents sent to the Governor's Office for review and approval by the Governor's Office prior to the Department publishing the Notice of Intent to Adopt. We sent the copies on July 31, 2007. The documents included: the Governor's Office Proposed Rule and SONAR Form; almost final draft rules; and almost final SONAR. Mr. Bogut sent a memorandum dated August 8, 2007, which included the following comments:

On behalf of the Commissioner of Finance, I have reviewed the proposed rule and related Statement of Need and Reasonableness to explore the potential impact these changes may have on local governments.

It is apparent from the documents submitted that there will be costs incurred by local units of government, primarily in the costs of continued education requirements, which many local governments would be responsible for as the inspectors employer. These costs would be in the form of (potentially) higher fees for existing courses (where additions are required by the rule), and more frequent or expanded training requirements (to the extent they exceed current requirements).

While an increase in costs is probable, the magnitude is likely to be minimal, and well within the normal expectation of inflationary cost pressures.

COST OF COMPLYING FOR SMALL BUSINESS OR CITY

Agency Determination of Cost

As required by Minnesota Statutes, section 14.127, the Division has considered whether the cost of complying with the proposed rules in the first year after the rules take effect will exceed \$25,000 for any small business or small city. The Division has determined that the cost of complying with the proposed rules in the first year after the rules take effect will not exceed \$25,000 for any small business. The Division also determined that the cost of complying with the proposed rules in the first year after the rules take effect will not exceed \$25,000 for small cities because the only cost they might bear is related to monitoring their own construction code inspector's compliance with the continuing education requirements of the proposed rule. As discussed above, the Division believes that these costs will be insignificant.

LIST OF WITNESSES

If these rules go to a public hearing, the Department anticipates having the following witnesses testify in support of the need for and reasonableness of the rules:

1. Staff of the Department's Construction Codes and Licensing Division;

2. Members of the technical advisory committee for this rulemaking; and
3. Mr. John Tilton, Designated Building Official, City of St. Louis Park.

RULE-BY-RULE ANALYSIS

1301.1300 AUTHORITY AND PURPOSE.

This new rule part specifies that the rule parts proposed are to establish competency criteria, establish and approve education programs, and establish continuing education requirements for construction code inspectors as mandated by Minnesota Statutes § 16B.655. The proposed language also clearly specifies that designated building officials will administer the proposed rules.

1301.1310 DEFINITIONS.

Definitions pertaining to the terminology used in the proposed rules are included so that users will clearly understand how the Department defines those terms. The Division believes this will clarify the intent and purpose of the rules.

Subpart 1. **Generally.** This subpart specifies that the definitions are applicable to specific rule parts.

Subp. 2. **Building Construction.** This definition clarifies the meaning of building construction, and what parts of the building site and structure it covers.

Subp. 3. **Building inspection technology course or BIT course.** This definition clarifies that a building inspection technology or BIT course is a course from an accredited college or university that is recognized by the Department.

Subp. 4. **Building Inspector.** This definition clarifies that the building inspector inspects buildings while under the supervision of the designated building official.

Subp. 5. **Combination inspector.** This definition clarifies that the combination inspector inspects buildings and structures in two or more disciplines while under the supervision of the designated building official.

Subp. 6. **Construction code inspector.** This definition clarifies that the construction code inspectors is a building inspector, mechanical inspector, plumbing inspector, or combination inspector who performs building, plumbing, or mechanical inspections while under the supervision of a designated building official.

Subp. 7. **Designated building official.** This definition clarifies that the term "designated building official" refers to the Minnesota Certified Building Official designated by a municipality to administer and enforce the Minnesota State Building Code pursuant to Minnesota Statutes, section 16B.65, subdivision 1.

Subp. 8. **Mechanical inspector.** This definition clarifies that the mechanical inspector inspects mechanical systems while under the supervision of a designated building official.

Subp. 9. **Mechanical system.** This subpart defines a mechanical system as a system, within the scope the Minnesota Mechanical Code, that is made up of devices, appliances, or equipment.

Subp. 10. **One year of experience.** This definition clarifies that the phrase “one year of experience” means 1,800 hours of time occurring within 12 consecutive months.

Subp. 11. **Plumbing inspector.** This definition clarifies that the plumbing inspector inspects plumbing systems while under the supervision of a designated building official.

Subp. 12. **Plumbing system.** This subpart defines a plumbing system as a system, within the scope of the Minnesota Plumbing Code, that is made up of devices, appliances, or equipment.

1301.1400 MINIMUM COMPETENCY CRITERIA.

Subpart. 1. **Generally.** This subpart specifies that a person conducting inspections for a municipality must meet minimum competency criteria. This subpart also repeats the statutory exemption, which exempts individuals holding a current building official certification from the minimum competency criteria requirement.

Additionally, this subpart specifies that all construction code inspectors hired on or after January 1, 2008, shall within one year of hire, be in compliance with the competency criteria of this part. This language was included to inform users of the timing requirement mandated by the Legislature.⁴

Subp. 2. **Building inspector.**

Subp. 3. **Mechanical inspector.**

Subp. 4. **Plumbing inspector.**

Subp. 5. **Combination inspector.**

These subparts specify minimum competency criteria that an individual must satisfy in order to perform inspections while under the supervision of a designated building official.

The building inspector, mechanical inspector, and plumbing inspector are required to satisfy at least one of several criteria in order to inspect building construction, mechanical systems, and plumbing systems respectively.

The criteria were carefully considered and recommended by the advisory committee. The criteria include options that are specific to each discipline. For example: completion of a subject specific BIT course or national certification in the related discipline. The criteria also include

⁴ See Minn. Stat. § 16B.655.

options that contain a breadth and depth of education and experience that is applicable to each discipline. For example: Three years experience in construction with specific skilled participation in the construction of foundations and superstructures to a bachelor's degree or more in architecture or engineering. In developing the proposed rule, the advisory committee considered what knowledge and skills should be present in the individual that performs the functions of a construction code inspector at the entry level, and what sources of this knowledge and skill are available in today's marketplace.

The criteria are as follows:

Construction Inspector

1. three years' experience in construction with specific skilled participation in the construction of foundations and superstructures;
2. five years' experience in the complete design of buildings;
3. successful completion of two or more BIT courses in building construction;
4. vocational or trade school diploma or equivalent education related to building construction;
5. bachelor's degree or more in architecture, engineering, or construction management;
6. national certification as a building inspector; or
7. two years' experience conducting building construction inspections while under the supervision of a designated building official.

Mechanical Inspector

1. three years' experience in the in the installation or design of mechanical systems;
2. successful completion of two or more BIT courses, with at least one course specifically related to mechanical systems;
3. vocational or trade school diploma or equivalent education related to mechanical systems;
4. bachelor's degree or more in architecture or engineering;
5. national certification in mechanical system inspections; or
6. two years' experience conducting mechanical system inspections while under the supervision of a designated building official.

Plumbing Inspector

1. three years' experience in the in the installation or design of plumbing systems;
2. successful completion of two or more BIT courses, with at least one course specifically related to plumbing systems;
3. vocational or trade school diploma or equivalent education related to plumbing systems;

4. bachelor's degree or more in architecture or engineering;
5. national certification in plumbing system inspections; or
6. two years' experience conducting plumbing system inspections while under the supervision of a designated building official.

Combination Inspector

The combination inspector is required to satisfy any one or more of the seven criteria in two of the three inspector disciplines (building, mechanical, or plumbing).

1301.1500 EDUCATION AND TRAINING.

This part specifies that the Commissioner will provide education and training to the construction code inspector, and evaluate educational programs offered by other providers.

Subpart 1. Education programs provided.

The Department currently offers educational programs for certified building officials and other interested persons. Those courses pertain to residential and commercial building construction, mechanical inspections, and plumbing inspections. These courses are developed at an entry level and an advanced level.

Subp. 2. Program evaluation.

The Department currently evaluates and approves educational programs developed and presented by other providers of continuing education courses for the certified building official. It is anticipated that this practice would expand to include educational programs specific to the construction code inspector.

The subpart specifies that the Commissioner shall evaluate code-related courses offered by other state, correspondence schools, universities, or other educational or code-related entities. The Commissioner is directed to consider these courses on an individual basis.

Once the Commissioner approves a course, the State Building Official is directed to award one continuing education credit per 50-minute contact hour. The Division determined, and the advisory committee recommended, that a 50-minute contact hour be used as the calculation method because it is easy to understand and apply. The Division believes that an understandable calculation method will assist all users: the individual that is earning the continuing education credit, the designated building official that has construction code inspectors working under their supervision, and those entities that develop and provide courses to these consumers.

Courses that are offered by correspondence are evaluated based upon the program content and the work the participant is required to successfully complete and submit in order to complete the program. The Division believes that including correspondence courses as an option for obtaining continuing education credit is reasonable in light of the quality of courses that are

available through traditional correspondence (paper) or online (web based).

1301.1600 CONTINUING EDUCATION.

This part specifies the minimum number of required continuing education credits that those individuals performing building, mechanical, and plumbing inspections (construction code inspectors) must meet each year.

Subpart 1. Mandatory continuing education.

This subpart specifies that construction code inspectors must meet annual continuing education requirements, provide evidence of completed continuing education credits to the designated building official, and that the designated building official must retain the evidence of compliance for XX years.

Subp. 2. Building, mechanical, and plumbing inspectors.

This subpart specifies that building, mechanical and plumbing inspectors must complete 15 hours of continuing education each year, with a minimum of six hours in the discipline in which they have demonstrated minimum competency.

The requirement for fifteen hours of education per year is closely related to the requirements for certified building officials, who are required to obtain 24 continuing education units every three years,⁵ which is approximately 18 hours of education per year if averaged over the three-year reporting period. The advisory committee recommended granting one continuing education credit per 50-minute contact hour to provide an easy to understand and apply calculation method for determining what constitutes a continuing education hour.

The advisory committee further recommended that the construction code inspector be required to obtain education in their discipline while permitting hours in other subject areas in order to promote professional growth, which, at their option, may enable them to become a combination inspector.

Subp. 3. Combination inspectors.

This subpart specifies that the combination inspector complete 20 hours of continuing education each year, with a minimum of six hours in each of the disciplines in which they have demonstrated minimum competency.

The advisory committee recommended this requirement because the combination inspector needs to maintain competency in at least two of the three disciplines. Since the combination inspector is required to be knowledgeable in multiple disciplines, they should also maintain that knowledge to keep abreast of changes in the industry.

⁵ Building officials are awarded 2.5 continuing education credits per 6 hours of education or .42 per hour.

In application, a combination inspector that meets the minimum competencies in two or more disciplines will be required to dedicate six hours of continuing education to each discipline. For combination inspectors meeting the competencies of two disciplines, six hours must be dedicated to two competencies (a total of 12). For combination inspectors meeting the competencies of all three disciplines, six hours (a total of 12) must be dedicated to two of the three competencies.

CONCLUSION

Based on the foregoing, the proposed rules are both needed and reasonable.

Date

August 21st 2009

Steve Sviggum, Commissioner

Construction Code Inspector Rules Advisory Committee Membership

<u>Name</u>	<u>Affiliation</u>
Barry Greive	CCLD Staff, Chair
Greg Karow	CCLD Staff, Co-Chair
Tim Fadden	Metro area plumber and MN certified building official
Scott Hutchins	1 st Class City Plumbing and Mechanical
John Lampert	Minnesota Association of Plumbing and Mechanical Officials
Ken Kammerer	Greater MN plumber and MN certified building official
Jim Solheid	South West MN Chapter of Building Officials
Keith Wille	10,000 Lakes Chapter of Building Officials
Craig Hoium	South East Minnesota Code Officials
John Aaron	Intern building inspector and BIT student
Scott Holm	State education committee
Pat Ellingson	Minnesota Association of Plumbing and Heating Cooling Contractors
Bruce Jaspersen	North West Chapter of Building Officials
Jim Peterson	CCLD Staff, Plumbing Unit
John Young Jr.	League of Minnesota Cities and public official (city council for jurisdiction who has not adopted building code)
Brian Hoffman	Association of Minnesota Building Officials

Interested parties present at multiple meetings:

Marty Strub	Sheet Metal Workers Local 10 / Sheet Metal, Air Conditioning & Roofing Contractors Association
John Tilton	Minnesota certified building official
Carl Crimmins	Minnesota Pipe Trades