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October 25, 2000

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Chairman John McGinley IRRC 14th Floor Harristown 2 333 Market Street Harrisburg, PA 17101

Dear Chairman McGinley:

We are writing in reference to the Uniform Construction Code regulations that are under review by the Independent Regulatory Review Board. It has been brought to our attention by several constituents, who are township code enforcement officers, that several problems exist with the certification and training requirements section that is under review by your agency.

First of all, we suggest that a statewide curriculum for the certification of code enforcement officers be developed with course offerings made available at local community colleges and vocational technical schools. Since other municipal service officers (police, fire) have statewide curricula offered at their respective training academies, then it would seem that the same uniform curriculum should be afforded to the code enforcement officers.

Second, according to the newly developed regulations, new municipal hires must be certified as a code inspector prior to their start date. This will create a hardship for local municipalities in acquiring future employees, if courses are not offered within reasonable distance to individuals to complete the requirements.

Third, there are approximately 150 master code enforcement officers across the United States. Under the Uniform Building Code regulations, one master code enforcement officer (MCEO) will be the minimum requirement for each municipality. This will create a hardship for smaller

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communities, that may be unable to afford their own MCEO. As a result, this could increase the incentive for third party inspectors, increase the cost to local municipalities, and create an associated lack of accountability that would have been afforded by a local inspector.

In light of the aforementioned issues, we are requesting that the Independent Regulatory Review Board evaluate these points and prepare changes to the administrative regulations accordingly. We do not believe their inclusion in the regulations will compromise legislative intent.

Thank you for your time in this matter.

Sincerely,

Mary Ann Dailey State Representative

146th Legislative District

James W. Gerlach State Senator

44th Legislative District