



Florida should expand the availability of contractors to address roof to wall connections.

Since the implementation of the Florida Building Code (FBC) in 2002, the resilience of Florida's buildings has been at the forefront of the code's requirements. The codes mitigation requirements, adopted as part of the 2007 Existing Building subcode and the 2009 supplements, included the following provisions during roof replacement of single-family site built residential structures permitted prior to the FBC:

- Roof Secondary Water Barriers
- Enhanced Roof Decking Attachment

Also included during roof replacement of homes in the wind-borne debris region that have an insured value for the structure of \$300,000 or more was:

- Enhanced Roof-to-Wall Connections

The primary trigger to implement these provisions was roof replacement. In Florida in nearly all cases, roofing contractors are the only contractors that can replace roofs. In order to facilitate the Enhanced Roof Decking Attachment provisions, the licensing statute definition of a "Roofing Contractor" was expanded as indicated by the underlined portion of the following paragraph:

(e) "Roofing contractor" means a contractor whose services are unlimited in the roofing trade and who has the experience, knowledge, and skill to install, maintain, repair, alter, extend, or design, when not prohibited by law, and use materials and items used in the installation, maintenance, extension, and alteration of all kinds of roofing, waterproofing, and coating, except when coating is not represented to protect, repair, waterproof, stop leaks, or extend the life of the roof. The scope of work of a roofing contractor also includes required roof-deck attachments and any repair or replacement of wood roof sheathing or fascia as needed during roof repair or replacement.

This change in the statute led to thousands of Florida homes having roof decking attachment enhancements completed during roof replacement. The positive results of these enhancements have been obvious during post hurricane mitigation assessments.

Unfortunately, the attempt to implement improved Roof-to-Wall connections has not been as effective. Because Roof-to-Wall connections are structural in nature, roofing contractors in many jurisdictions have been precluded from doing this work. The interruption of the roofing process causes these improvements, when made, to be very burdensome and expensive. Often, an engineer or division one (General, Building or Residential) contractor had to be brought in to assess the scope of work. This caused many owners to forgo Roof-to-Wall connection enhancement, which is often not required when deemed by the owner to be too expensive.

In the 2020 FBC, these mitigation requirements were expanded from single-family site built residential structures to existing structures with sawn lumber, wood plank or wood structural panel roof decks. This change was made to lessen the cost of property insurance claims and to reduce the displacement of the inhabitants of all of these structures.

The re-implementation of the My Safe Florida Home program has brought enhanced Roof-to-Wall connections back to the attention of those charged with administering the program. These enhancements are one of the most effective ways of reducing damage during hurricanes.



However, most division one contractors have little interest in getting involved in the middle of a roof replacement project. To allow these provisions to be effective and performed properly, the need to allow roofing contractors to perform this work and to be trained to follow the prescriptive sections in the code has become apparent. Much like the expansion of the roofing contractor's licensure scope that allowed the enhanced roof decking attachment to be effective, a change is also needed that will allow licensed roofing contractors to address the code's prescriptive Roof-to-Wall connection requirements.

This change could possibly be accomplished through an interpretation of the existing language or with new language similar to the following:

(e) "Roofing contractor" means a contractor whose services are unlimited in the roofing trade and who has the experience, knowledge, and skill to install, maintain, repair, alter, extend, or design, when not prohibited by law, and use materials and items used in the installation, maintenance, extension, and alteration of all kinds of roofing, waterproofing, and coating, except when coating is not represented to protect, repair, waterproof, stop leaks, or extend the life of the roof. The scope of work of a roofing contractor also includes required roof-deck attachments, or any repair or replacement of wood roof sheathing or fascia as needed during roof repair or replacement. It shall also include the evaluation and enhancement of roof-to-wall connections as described in section 706 of the FBC Existing Building for structures with wood roof decks. Provided, any enhancements are done in conjunction with a roof covering replacement and the roofer has training to do so; including their relationship to and proper installation for credit on the OIR-B1-1802 form and Florida Building Code.

We recommend elective general continuing education at the time of license renewal of a minimum of 2 hours with a certificate of completion issued for those roofers who choose to retrofit homes. The certificate should be required by building officials at the time of permit application to provide notice of proper training on retrofit methodology and proper installation for applicable insurance effects.

Thank you for your consideration.

Respectfully Submitted,

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