



Alliance for Regulatory Coordination

January 6, 2020

Dawn B. Crim, Secretary
Department of Safety and Professional Services
dsps@wisconsin.gov

Dear Secretary Crim:

Thank you for inviting me to represent the Alliance for Regulatory Coordination during your plan review discussion group meeting on December 17, 2019. The ARC supports improvement of state level plan review services provided by the DSPS and its designated municipal partners. On January 15, 2020, ARC members will meet to discuss the ideas raised during the December discussion group meeting and to begin developing our advice to you in regards to those ideas.

In the meantime, I will share ideas that the ARC has already agreed upon relative to how state level plan review services could be improved through prioritization and process streamlining.

Regarding project prioritization, ARC members recommend reinstating certain exemptions from commercial building plan review that were in the Commercial Building Code from July, 2002 to Sept., 2011. Attached is a white paper that further explains this recommendation.

Regarding process streamlining, ARC members recommend repealing or simplifying the statutorily required plan review participation fees charged to municipal plan review partners of the Department. In a joint effort with the League of Wisconsin Municipalities and the Wisconsin Economic Development Association, we have previously written to the DSPS, Governor Evers, and the Legislative Joint Committee on Finance, advocating the repeal of such fees in the Biennial Budget Bill. Attached is a copy of the joint letter and white paper sent to the Joint Committee on Finance, in April, 2019.

We believe the current fee structure applied to agent municipalities is a barrier to municipal participation in the state-level plan review program. That barrier is contributing to the DSPS plan review backlog. For example, the North Shore Fire Department, serving eight municipalities in northern Milwaukee County, conducts plan review for fire sprinkler and alarm systems. However, the North Shore Fire Department is not a DSPS agent due to the complexity associated with collecting fees to be sent to the DSPS as now required by statute. In 2019, the North Shore Fire Department conducted an estimated 200 plans for fire sprinkler or alarm



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systems. Unfortunately, because North Shore is not a DSPS plan review agent, all 200 of those plans were also required to be reviewed by the DSPS. That redundant and needless workload on the DSPS could be eliminated if North Shore were a DSPS agent for plan review. Removing 200 plan reviews from the DSPS workload every year would go a long way to addressing the current long wait for DSPS review of fire sprinkler and alarm plans. And this is only part of the plan review overlap problem. Redundant plan review by state and municipal officials is an unnecessary burden on building designers, builders and owners; costing both time and money.

Attached is a draft of possible statute changes that would repeal the currently mandated fees and require the DSPS to accept municipal plan and petition review services at no cost. The "at no cost" provision is presently in the statutes relative to inspections. This ARC proposal would expand that concept to plan and petition review. The suggested statute changes are shown in red. The present statute provisions about "at no cost" relative to inspections are shown in blue.

While the repeal of statutorily required plan review participation fees is our preference, we recognize that instead of repeal, the fees could be simplified by changing administrative rules. Annual flat fees, set by administrative rule, would also facilitate more municipal plan review partners because flat fees are much easier to budget for, and authorize, at the municipal level. In addition, tracking of municipal plan review activity and the subsequent required fee submissions, as now required, would be eliminated for both the DSPS and its agents.

We applaud your attention and efforts to improve state level plan review services provided by the DSPS and its designated municipal partners. We welcome any opportunity to discuss this matter with you, and look forward to helping move Wisconsin forward in this regard.

Sincerely,

Robert G. DuPont, Founder
Alliance for Regulatory Coordination
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Copies to: Dan Hereth, DSPS; Bill Babcock, AIA-WI; John Schulze, ABC-WI
Four attachments



Alliance for Regulatory Coordination

Classic Members

International Association of Electrical Inspectors, Wisconsin Chapter

International Brotherhood of Electrical Workers, Wis. State Conf.

National Electrical Contractors Association, Wisconsin Chapter

Northwest Wisconsin Building Inspectors Association

Plumbers Union Local 75

Plumbing-Heating-Cooling Contractors, Wisconsin Association

Water Quality Association of Wisconsin

Wisconsin Code Officials Alliance

Wisconsin Electrical Trades Council

Wisconsin Fire Protection Coalition

Wisconsin State Fire Chief's Association

Wisconsin State Fire Inspectors Association

Associate Members

National Association of the Remodeling Industry, Milw. Chapter

Professional Fire Fighters of Wisconsin

Southwestern Wisconsin Building Inspectors Association

Wisconsin Electric Cooperative Association

Wisconsin Propane Gas Association

Wisconsin State Firefighters Association

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