

Connecticut Code Chronicle

An occasional publication by Harwood Wallace Loomis, Consulting Architect,
for the use and information of the design and code enforcement communities

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STATUTORY CHANGES

The legislature enacted a bill this year that made a number of changes to requirements affecting various professions under the Department of Consumer Protection. Some of the changes pertain to architects and the practice of architecture, which trickles down to become information building departments need to be aware of. The following will be a summary of what the changes are and how they may affect building department activities and policies.

The new law is Public Act 25-111, An Act Concerning The Department Of Consumer Protection's Recommendations Regarding Various Statutes Concerning Consumer Protection. The changes will become effective in October 1, 2025. Anyone who wants to read the entire 99 pages of the act can download it from the legislature's web site.¹

Notable provisions:

- The Architectural Licensing Board is supposed to maintain a roster of all architects licensed in the state, and they are supposed to send the roster to all municipal building departments annually. In reality this never happens, but the Department of Consumer Protection does keep the current roster on their e-Lookup web page, so we can easily look up anybody we suspect of not being licensed.²
- The act tightens up the regulations pertaining to people who try to pass themselves off as architects. It has always been unlawful for anyone to practice architecture without a license (subject to a few exceptions), but the revised language adds more restrictions on what unlicensed people can and cannot claim to offer as services. No one is allowed to use the title "architect", or display or use any words, terms, letters, figures, title, sign, seal, advertisement or other device to indicate that such person practices or offers to practice architecture, including, but not limited to, the terms "architectural design", "architectural services" and "architectural drawings", unless such person has obtained a license.
- One of the exceptions for licensure is buildings under 5,000 square feet, and one- and two-family residences. Anyone can design those (except for certain occupancy classifications) without being a licensed architect, but the act adds a stipulation: Unlicensed individuals practicing architecture without a license under any of the exceptions in the licensing law may not use the title "architect", or display or use any words, terms, letters, figures, title, sign, seal, advertisement or other device to indicate or imply that such person practices or offers to practice architecture, including, but not limited to, the terms

"architectural design", "architectural services" and "architectural drawings."

- In addition, unlicensed individuals engaging in architectural design or plan preparation will now be required to clearly and conspicuously include the words "NOT A LICENSED ARCHITECT" as a statement on all their contracts, advertisements, promotional materials, plans and specifications. [*Note: I interpret this to mean that the NOT A LICENSED ARCHITECT statement must be placed on each sheet of a set of construction documents, not just on the cover sheet.*]

These last two items, in particular, should help building departments keep track of the unlicensed "building designers" who try to make their clients believe they are architects. Just as we are required to verify that digital seals comply with State law regarding third-party verification, we should also be checking that construction documents using names that imply the practice of architecture were actually prepared by a licensed architect (or under his/her direct supervision). I know of at least two individuals whose title block *implies* that they are architects—but they aren't, even though they tell their clients they are architects. When receiving construction documents prepared by such individuals, we have another reason to reject them.

Remember, interior designers are not licensed design professionals in Connecticut. In Connecticut, interior designers are registered, not licensed. Interior designers are not authorized to use a seal, and may not practice architecture unless they fall under one of the exemptions listed in the architecture licensing statute. No one is allowed to call themselves an interior designer unless registered with the Department of Consumer Protection, but it is not the responsibility of local building officials to enforce this limitation. We do have a responsibility to recognize when interior designers are practicing architecture without a license.

Ideally, any individual who practices architecture without a license should also be reported to the Department of Consumer Protection. However, your municipality's administration may not want their building department to report such activity, so be aware of your municipality's policies and preferences before proceeding.

¹ <https://cga.ct.gov/2025/act/pa/pdf/2025PA-00111-R00SB-01357-PA.pdf>

² <https://elicense.ct.gov/Lookup/LicenseLookup.aspx>

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OSBI ADVISORY

On September 5, 2025, State Building Inspector Omarys Vasquez issued Advisory A-25-01: Condensate Disposal for Ductless Mini-Splits. In case you missed it, I am reproducing the entire text of the advisory in the interest of spreading the word.

It has come to our attention that Section M1411.3.1 of the International Residential Code (IRC), related to auxiliary drain pans and secondary drain requirements for condensate disposal, has been interpreted and applied in different ways across municipalities. To support consistency and provide clarity, this advisory outlines the intent and requirements of this section. The purpose is to assist all jurisdictions in applying the code uniformly, ensuring alignment with statewide standards and promoting clear understanding for both officials and the regulated community.

Ductless mini-split systems can experience drainage issues due to several common causes such as clogged drain lines, where dirt, debris, or algae can accumulate, blocking water flow and causing overflow; dirty air filters that can restrict airflow, leading to evaporator coil freezing and subsequent water leakage; and low refrigerant levels that can cause coils to freeze and melt, resulting in heat leaks and potential water damage.

Since ductless mini splits have cooling coils and evaporators, they are required to comply with Section M1411.3 of the 2021

IRC portion of the CSBC. In addition, Sections 314.2.3 of the 2021 IPC and 307.2.3 of the 2021 IMC portions of the CSBC, have similar criteria as those found in the IRC. According to these sections, “a secondary drain or auxiliary drain pan shall be required for each cooling or evaporator coil where damage to any building components will occur as a result of overflow.”

Building components are essential materials for building construction and include, but are not limited to, electrical, mechanical equipment, plumbing, structural, floors, walls, beams, etc. A review of the proposed installation location by the local building official is necessary to determine if an overflow of the drain pan will cause damage to building components and if determined that the location of one of these units can cause such damage, then compliance with Section M1411.3.1 is required.

The IRC provides four methods for auxiliary drain pan and secondary drain compliance, one of which includes the installation of a water level detection device that is required to conform to UL 508.

SIGNIFICANT CHANGES TO THE IRC

Connecticut is preparing to adopt the 2024 I-Codes. We’re going to be late—the adoption date should have been October 1 of 2025, but here we are with the public comment period just ending and adoption now not scheduled until 2026. But ... better late than never. There will be some significant changes in the 2024 I-Codes, and it’s not too early to start getting ready for them.

With the 2024 I-Codes, the ICC has abandoned the familiar two-column format we have been accustomed to seeing since 2005, in favor of a single-column (full-width) layout format. The font has also changed from Times New Roman to an obscure sans serif typeface that the ICC assures us is more readable. (Hint: It’s not.) Beyond that, there are a number of technical changes. The following is a summary produced by the National Association of Home Builders: [This does not address any Connecticut amendments.]

This summary includes significant changes to the International Residential Code (IRC) building provisions (Chapters 1-10 and 44), electrical, mechanical and plumbing provisions (Chapters 12-43) and appendices. Changes to the energy efficiency provisions (Chapter 11) are addressed as part of the 2024 IECC Adoption Kit. This is not all the changes that were approved.

A note regarding IRC Chapter 3. In the 2024 IRC, Chapter 3 has been reorganized; all the sections related to structural, or fire resistance are grouped first, followed by the sections related to fire and CO detection and fire sprinklers, followed by the sections on configurations of rooms or spaces, followed by the means of egress and accessibility provisions, followed by sections relating to the indoor environment, and finally solar and other on-site energy systems.

IRC Section R104 Duties and Powers of the Building Official:

The 2024 IRC sees an entire replacement of Section R104 Duties and Powers of the Building Official. Most sections do not have significant technical changes. One area of concern is R104.2.1 that would allow a Building Official to require equipment, materials, products, or service listings to be provided to the Building Official at cost to an applicant.

IRC Section R302.1 Exterior walls:

Where a lot line doesn’t already exist between townhouses, a lot line is required to be assumed for purposes of fire separation distance measurement. The proposal is meant to address interior corners where there is no existing or possible future structure measured perpendicular to the wall—a large departure from how fire separation distance has been used.

IRC Section R318.7 Stairways:

Several changes were made to requirements for stairways, as noted below.

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IRC Section R318.7.5.3 (was R311.7.5.3) Nosings: This change limits the 3/8" minimum/maximum uniformity requirement for nosing projections from applying across the entire stairway to application individual flights of stairs and their upper landings.

IRC Section R318.7.6 (was R311.7.6) Landings for stairways: New and revised exceptions for landings allow:

- The top landing of an interior stairway, including those in an enclosed garage, to be on the other side of a door located at the top of the stairway.
- At an enclosed garage, the top landing at the stair can be up to 7 3/4 inches below the top of the door's threshold.
- At exterior doors, a top landing is not required for an exterior stairway of not more than two risers.
- Where not serving the required egress door, exterior stairways to grade with three or fewer risers serving a deck, porch or patio shall have a bottom landing width of not less than 36 inches, regardless of the width of the stairs.

IRC Section R318.7.9 Stairways in existing buildings: Alterations to existing stairways are no longer required to comply with the requirements for new stairs when the existing space and construction does not allow a reduction in stairway pitch or slope.

IRC Section R329.6.4 (was R324.6.4) Building-integrated photovoltaic (BIPV) systems: A new section is added requiring reflective markings beneath eaves where installed BIPV systems create hidden electrical hazards. An exception is provided for systems listed to UL 3741 as they do not present a hazard.

IRC Section R401.4.1 Geotechnical evaluation: The existing Table R405.1 of soil classifications is moved to a more logical location early in Chapter 4 near where it is first referenced. The table is expanded to enable the use of USDA data and textural descriptions to ensure builders select a proper soil classification where a geotechnical investigation isn't done and clarifies what soil types are unsuitable for backfill due to their poor drainage characteristics.

IRC Section R502.3, R802.4.1 & R802.5 Framing Member Splices: Adds new text in the sections for floor joists, rafters and ceiling joists requiring that all splices in framing members occur over vertical supports or shall be designed by a registered design professional.

IRC Section R502.11 Floor framing supporting guards: Prescriptive options area added for framing at the open edge of a

floor supporting a required guard assembly. Prescriptive options are included for conventional and timber edge framing. Floor trusses and I joists used as edge members supporting guards shall specifically consider the guard loads in their design.

IRC Section R506.3.3 Vapor retarder: A 6-mil construction-grade polyethylene vapor retarder is allowed to be placed under a concrete floor slab instead of a 10-mil vapor retarder complying with ASTM E1745 Class A requirements. This reverses the change from last cycle requiring the 10-mil proprietary vapor retarder under floor slabs.

IRC Section 507.9.1.5 Ledger Flashing: Prescriptive requirements are added for deck ledger flashing. The water-resistive barrier must run continuous behind the ledger and lap over a vertical leg of the ledger flashing. Exceptions from the flashing and lapping requirements are provided where the deck ledger is spaced off the building at least 1/4 inch.

IRC Section R602.10.3.1 Wall Height for Wood Framing: A definition of "light-frame stud wall height" is added for the determination of braced wall and panel adjustment factors. The term "story height" is changed to "wall height" in the adjustment factor tables and an error in Tables R602.10.3(2) & R602.10.3(4) for wind adjustment factors is corrected.

IRC Section R703.7.3 Water-resistive barriers: Requires the water resistive barrier and drainage requirements for stucco to be applicable to all sheathing types behind stucco, not just wood-based sheathing, except where accumulation, condensation or freezing of moisture will not damage the materials.

IRC Section M1411 Refrigerants: This section now includes provisions for the use of masonry parapets in high-seismic areas when more than 25 percent of the roof is reroofed, and a reroofing permit is issued. • Adding a requirement for a wall-mounted switch controlling lighting outlets when a room is altered. The switch must be located near an entrance to the room.

- Adding requirements to provide stairway illumination and code-compliant handrails and guards when stairs are altered.
- Adds requirements for horizontal and vertical additions to an existing dwelling. For horizontal additions, the new portions and altered elements of the existing dwelling must comply with the structural code requirements for new construction. For vertical additions, the existing dwelling and new construction together must be shown to comply with the structural requirements of the code for new construction,

CORRECTION

Last month I wrote that the State Library is going to create a digitization policy, to be applicable to municipalities in Connecticut. I have since learned from the State Library that this is not correct. The State Library is *not* going to generate a template digitization policy. What has changed is that each municipality is still required to create its own policy, but the municipalities are no longer required to submit their digitization policies to the State Library for approval. The State Library is *not* going to create a master policy for municipalities to adopt or to follow.

This means that building departments should not wait for the State Library to issue a policy. Check with your Town Clerk or City Clerk and ask what policies your municipality has in effect regarding digital documents and digital records. Even if your municipality doesn't have a written digitization policy in place yet, state laws and regulations pertaining to digital records apply to your records nonetheless. As department heads, it is the responsibility of building officials to ensure that departmental

records adhere to the applicable State regulations and guidelines. I encourage all building officials to download the following documents from the State web site and to review the requirements with your staff (both the inspection staff and the administrative staff—anyone who creates any sort of documents or records):

- PRP 04: Electronic Records Management
- PRS 04-1: Electronic Records Standards
- PRS 04-2: Digital Imaging Standards
- PRM 101: Disposition of Original Paper Records after Scanning (2024)

The important things for building department staff to be aware of are especially the requirements for metadata, and for the naming of files.

I regret the error in the original article. I hope I've managed to convey the correct information this time.

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The editor is a licensed architect and a licensed building official, with more than 40 years of experience. I offer non-structural plan review services for projects of any size, with special rates for municipal building departments.

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What topics would you like to see discussed in future issues? It helps all of us if we can all be on the same page, to avoid those "But I never have to do that in [town]" complaints.

Send me an e-mail if you think of any issues that affect all building officials, everywhere.