Binding Interpretation #318 (Revised 10.27.26)

A Threshold Inspector is required for the replacement of any window, exterior door on any threshold building.

On 1/26/26 binding interpretation #318 of the Florida Building Code (FBC) was made by the Florida Building Commission in accordance with the prescribed process and procedures as outlined in Florida Statute 553.775 Interpretations.

Effective 3/12/2026, all new permit applications for window, or exterior door installations or replacements on threshold buildings will be reviewed to comply with this new binding interpretation.

Binding Interpretation #318 directed that replacement of windows constitutes a modification of the building's structural system, and as such, is required to comply with Section 110.8.1 (Inspection of threshold building) of the Florida Building Code, Building, 8th Edition (2023).

The Structural system of a building has ordinarily been considered to mean the gravity load carrying elements and the "main wind force resisting system" (MWFRS) (and main system resisting other loadings such as seismic, flood, earth pressure).

The ASCE 7 (American Society of Civil Engineers standards for structural design) "main wind force resisting system" definition: "An assemblage of structural elements assigned to provide support and stability for the overall building or other structure. The system generally receives wind loading from more than one surface." ASCE 7 Commentary adds that cross bracing, shear walls, roof diaphragms are part of the MWFRS when they assist in transferring overall loads to the ground. In other words, it does not include an exterior non-loadbearing, non-shearwall wall.

Prior to this binding interpretation, it was the position of Collier County, that windows, or exterior doors, although part of the building's structure and subject to wind loads, were not a structural member or part of the structural system, which require threshold engineering, threshold inspection plans, and threshold inspections when doing a like-for-like replacement.

Only when modifying the wall, opening, or other parts of the building structure, would threshold requirements in Section 110.8 of the FBC, Building be triggered.

What this means:

During repair or replacement projects for windows, or exterior doors, the State of Florida now requires an engineer or architect provide a threshold inspection plan and a special inspector (SI) to perform a structural inspection on a threshold building receiving a replacement window, door or new installation/replacements of a shutter pursuant to the structural inspection plan prepared by the engineer or architect of record.

The special inspector structural inspection plan must be submitted to Collier County prior to the issuance of the building permit.

The purpose of the structural inspection plans is to provide specific inspection procedures so that the threshold building can be adequately inspected for compliance with the permitted documents.

The threshold inspection is not in place of the Florida Building Code inspection but is a duplicative inspection. Both the threshold inspection and a Florida Building code Inspection are required.

Per FBC 110.6.6 the Threshold Inspector may also perform the duplicative Florida Building Code Inspection. In this case Collier County would only perform the final building inspection when required.

What is a Threshold Building?

A Threshold building is defined by Florida Statute 553.71 as any building which is greater than three stories or 50 feet in height, or which has an assembly occupancy classification as defined in the Florida Building Code which exceeds 5,000 square feet in area and an occupant content of greater than 500 persons.

What is a "Special Inspector (SI)"

A Special Inspector of Threshold Buildings (also referred to as a Threshold Inspector) is a registered professional engineer certified by the state of Florida as having met the requirements for qualification established by the Florida Board of Professional Engineers in Rule 61G15-35.003, Florida Administrative Code (the statutes also allow licensed architects to hold a Special Inspector license). This individual is tasked with performing structural inspections on threshold buildings, while under construction, pursuant to the structural inspection plan (sometimes referred to as the Threshold Inspection Plan) prepared by the structural engineer-of-record (SEOR) for that building. Where applicable, the special inspector is also responsible to ensure that a professional engineer who specializes in shoring design has properly inspected all shoring and reshoring.

The engineer (or architect) of record for a project MAY act as the Special Inspector, provided they are on the list of persons qualified as Special Inspectors as maintained by either the Florida Board of Professional Engineers or the FL Board of Architecture and Interior Design.

What is a "Threshold Inspection Plan"

The purpose of a structural inspection plan (Threshold Inspection Plan), created by the SEOR for a threshold building, is to identify critical structural elements of the building or element to the

Special Inspector so that those elements are properly inspected during construction to ensure compliance with the permitted documents. The Threshold Inspection Plan is included along with the contract documents for the building when a building permit application is submitted and becomes part of the contract documents for that project.

What is the role of the SI?

Simply stated, it is to inspect only those structural members identified by the Threshold Inspection Plan. The SI does not in any way assume the roles or responsibilities of either the building inspector or a third-party inspector who have different, distinct, and clearly defined roles of inspections for a Threshold Building. Similarly, the role of the Special Inspector is unrelated and independent from the role of the Engineer-of-Record for the project.

The Special Inspector's role is not as a full-time inspector; they only inspect those structural elements listed in the Threshold Inspection Plan and at frequencies and/or milestones if so stipulated in the Inspection Plan.

Who is responsible for scheduling the threshold Inspections?

Since the contractor maintains and is responsible for the project's construction schedule, it is the contractor who schedules the inspections for the Special Inspector on a Threshold Building.

Additional Documents Required:

Threshold inspection plan:
Prepared by a licensed engineer or architect and is required to be submitted with the permit application. This plan must list all the special inspections and observations required for the installation. The threshold inspector may prepare this plan. FBC 110.8.1

Fee Owners' letter:
The fee owner of a threshold building, not the contractor, must select and pay the costs of employing the threshold inspector. The Fee owner must provide along with a copy of the SI license, a signed letter addressed to the building official indicating by name they have hired a threshold inspector and specify for what services. FBC 110.8.3

The fee owner may hire the SI for threshold inspections only or for threshold and the FBC inspections. The letter must specifically state which services are being performed by the SI

Special Inspector Final Report
The special inspector, upon completion of the building and prior to the issuance of a certificate of occupancy, must submit a signed and sealed statement to Collier County, in substantially the following form:

“To the best of my knowledge and belief, the above described construction of all structural load-bearing components complies with the permitted documents submitted to the enforcement agency.” FBC 110.8.4.1