Regulatory Analysis

Notice of Intended Action to be published: 481—Chapter 301
"State Building Code"

Iowa Code section(s) or chapter(s) authorizing rulemaking: 103A.7 and 103A.8A
State or federal law(s) implemented by the rulemaking: Iowa Code chapter 103A

Public Hearing

A public hearing at which persons may present their views orally or in writing will be held as follows:

January 27, 2026	6200 Park Avenue
10 to 10:30 a.m.	Des Moines, Iowa

Virtual participation information will be available on the Department of Inspections, Appeals, and Licensing's website prior to the hearing.

Public Comment

Any interested person may submit written or oral comments concerning this Regulatory Analysis, which must be received by the Department no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

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Purpose and Summary

Iowa Code section 103A.7(1) provides that the State Building Code Commissioner is empowered and directed to formulate and adopt and from time to time amend or revise State Building Code rules. Pursuant to Iowa Code section 103A.7(2), the rules shall include (among other things) reasonable provisions for the conservation of energy through thermal efficiency standards for buildings that are intended for human occupancy and that are heated or cooled and lighting efficiency standards for buildings intended for human occupancy that are lighted. Additionally, pursuant to Iowa Code section 103A.8A, the State Building Code Commissioner shall adopt as a part of the State Building Code a requirement that new single-family or two-family residential construction shall comply with energy conservation requirements.

The purpose of this proposed rulemaking is to amend the energy conservation provisions of the State Building Code to increase the acceptable air leakage rate when simulated energy performance analysis is utilized. For a number of years, the energy conservation rules of the State Building Code have amended the adopted International Energy Conservation Code (2012 Edition) (IECC (2012)) to increase the acceptable air leakage rate when using physical testing with a blower door from three air changes per hour to four air changes per hour (in Climate Zones 3 through 8, which encompass Iowa). This amendment can currently be found at subrule 301.24(9). Note that the physical testing of air leakage rate with a blower door is a mandatory provision that must be performed on all constructed residences.

To demonstrate compliance, the IECC (2012) provides a general prescriptive route and an alternative performance route or "simulated performance alternative." As the name suggests, this alternative is a simulated analysis using software that is conducted on proposed residential construction (i.e., before construction is completed). The simulated energy performance analysis has many fields or building components, of which air exchange rate is just one. The acceptable air leakage rate under the IECC (2012) simulated energy performance analysis is three air changes per hour, and it is not currently amended by State rules. It has come to the Department's attention that this has created confusion within the homebuilder industry and with local enforcement of these provisions, with some in the field believing that the amendment to acceptable air leakage rate for physical testing also applies to the acceptable air leakage rate that is one component of the simulated energy performance analysis. To alleviate this confusion, the Department is proposing to also amend IECC (2012) by State rule to allow for four air changes per hour during the simulated energy performance analysis.

Additionally, this proposed rulemaking would make the simulated energy performance analysis less restrictive, consistent with the directives of Executive Order 10. The Department has received preclearance for this proposed rulemaking from the Administrative Rules Coordinator pursuant to Section IV(A)(i) of Executive Order 10.

Analysis of Impact

1. **Persons affected by the proposed rulemaking:**

- **Classes of persons that will bear the costs of the proposed rulemaking:**

The Department does not believe there are any costs associated with this proposed rulemaking.

- **Classes of persons that will benefit from the proposed rulemaking:**

Homebuilders should benefit from the proposed rulemaking when utilizing simulated energy performance analysis since this proposed rulemaking increases the acceptable air leakage rate component of that alternative compliance method.

2. **Impact of the proposed rulemaking, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred:**

- **Quantitative description of impact:**

The quantitative impact of this proposed rulemaking is that the acceptable air leakage rate for proposed residential construction when utilizing simulated energy performance analysis will increase from three to four air changes per hour.

- **Qualitative description of impact:**

The qualitative impact of the proposed rulemaking is to create equivalent acceptable air leakage rates for final physical testing using a blower door and compliance demonstration of proposed construction when utilizing simulated energy performance analysis, as well as to alleviate confusion in the homebuilding industry where some believed that both already allowed for four air changes per hour.

3. **Costs to the State:**

- **Implementation and enforcement costs borne by the agency or any other agency:**

There are no enforcement costs associated with this proposed rulemaking that would be borne by the Department or any other State agency.

- **Anticipated effect on State revenues:**

This proposed rulemaking has no anticipated effect on State revenues.

4. **Comparison of the costs and benefits of the proposed rulemaking to the costs and benefits of inaction:**

As discussed in Sections 1 and 2 above, the Department does not believe there are any costs associated with this proposed rulemaking, while the benefit is to create equivalent acceptable air leakage rates for residential construction during physical testing with a blower door and compliance demonstration using the simulated energy performance analysis alternative, as well as to alleviate

confusion in the homebuilding industry and local enforcement created from the existing nonequivalent rates.

5. **Determination whether less costly methods or less intrusive methods exist for achieving the purpose of the proposed rulemaking:**

There already are no costs associated with this proposed rulemaking, and this proposed rulemaking is not intrusive. Rather, this proposed rulemaking makes the rules less restrictive.

6. **Alternative methods considered by the agency:**

- **Description of any alternative methods that were seriously considered by the agency:**

Other than the existing acceptable air leakage rate of three air changes per hour when utilizing simulated energy performance analysis, no other alternative methods were considered.

- **Reasons why alternative methods were rejected in favor of the proposed rulemaking:**

This proposed rulemaking was chosen over the existing rule to create equivalent acceptable air leakage rates for residential construction during physical testing with a blower door and compliance demonstration using the simulated energy performance analysis, as well as to alleviate confusion in the homebuilding industry and local enforcement created from the existing nonequivalent rates.

Small Business Impact

If the rulemaking will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rulemaking on small business:

- Establish less stringent compliance or reporting requirements in the rulemaking for small business.
- Establish less stringent schedules or deadlines in the rulemaking for compliance or reporting requirements for small business.
- Consolidate or simplify the rulemaking's compliance or reporting requirements for small business.
- Establish performance standards to replace design or operational standards in the rulemaking for small business.
- Exempt small business from any or all requirements of the rulemaking.

If legal and feasible, how does the rulemaking use a method discussed above to reduce the substantial impact on small business?

The Department does not believe that this proposed rulemaking will have a substantial impact on small business. To the extent small business homebuilders are impacted by this proposed rulemaking, they will benefit from a less restrictive acceptable air leakage rate when utilizing simulated energy performance analysis, as well as an alleviation of confusion in the homebuilding industry created from the existing nonequivalent rates.

Text of Proposed Rulemaking

ITEM 1. Adopt the following **new** subrule 301.24(12):

301.24(12) Delete the first clause of the Standard Reference Design for Building Component "Air exchange rate" in Table R405.5.2(1) and insert in lieu thereof the following new clause: "Air leakage of 5 air changes per hour in Climate Zones 1 and 2, and 4 air changes per hour in Climate Zones 3 through 8 at a pressure of 0.2 inches w.g (50 Pa)."