



**Informal Interpretation Report
Number 4467**



Date July 17, 2025

Edition 2001

Section 403

Question:

Is it the intent of, the ?exception? in paragraph 403.3, to submit the type of comprehensive, support documentation as follows, to validate intermittent occupancy?

Engineering Calculation and School District Policy Sheets:

1. School District Education Specification, outlining the intended student and staff daily occupancy and normal student scheduling.
2. Graphic calculations illustrating daily classroom occupancies and occupied periods that are less than 3 hour duration, compared to the duration of the a/c system?s operation.
- 3 Numerical calculations of the classroom?s daily, ?Adjusted Occupancy Factor?.

Testing and Statistical Data Sheets:

1. Empirical test data of classroom CO₂ levels from existing schools, designed and operating with reduced ventilation rates based on the ?Adjusted Occupancy Factor?. All tests are within safe limits; ??indoor CO₂ concentrations less than 700 ppm above outdoor air concentrations.?
2. A seven year experiment/ test in approximately 40 schools, with 100% success, using the adjusted ventilation rates calculated with the ?Adjusted Occupancy Factor?. No IAQ problems in any of these schools built (since 1999), and occupied.

References and Collaborating Information Sheets:

1. Letter from FDOE dated April 3, 2003 writes, "The office, with the Building Code Official's concurrence, accepts occupancy densities, including those based on intermittent and variable procedure, which deviate from the prescribed occupant densities in Table 403.3 provided realistic documentation is provided."
2. BOAF #3996's Commentary writes, "Sufficient documentation must be submitted to the code official to justify any deviation from the prescribed occupant densities. The exception may allow the code official to accept the occupancy load based on application of the 3-hour-duration peak occupancy provision of ASHRAE 62."
3. BOAF #4346's Commentary writes, "The exception to M403.3 allows design occupancy density to be reduced with sufficient documentation."
4. A list of School Districts (with names and phone numbers) that use paragraph's 403.3 "exception" to institute their intermittent occupancy calculations.
5. A list of School Districts (with names and phone numbers) that say they intend to soon implement paragraph's 403.3 "exception" and calculate their intermittent occupancy.

end.

Notice:

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.