

COMPLIANCE ISN'T A MILESTONE

A practical guide to managing code compliance throughout design.



A PLANNING TOOL, NOT A CODE ANALYSIS

Compliance checklists are often organized by phase: at schematic design, confirm occupancy; at design development, check accessibility. That structure is convenient, and it is also misleading. It suggests that a topic is handled once and is then complete.

In practice, requirements are established early, tested as the design takes shape, and tested again every time something they depend on changes. This guide organizes compliance around that cycle. Each compliance area is traced across six phases, with the kind of work that typically dominates at each point.

It is intended as a practical planning resource for architecture teams, not a phase-by-phase substitute for professional code analysis.

READ THIS FIRST

- Timing and applicability vary by project type, jurisdiction, delivery method, and how the design develops. Fast-track, design-build, and phased projects compress or overlap these phases.
- Code references use the ICC model codes (I-Codes) as a common baseline and indicate where requirements usually live. Your project answers to the editions and **local amendments** your jurisdiction has adopted, and some jurisdictions and building types are governed by other codes and standards entirely.
- This is not legal advice or code advice. Compliance determinations belong to the licensed professional of record and, ultimately, to the **authority having jurisdiction**.

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ESTABLISH, VALIDATE, REVALIDATE, DOCUMENT

Every compliance area moves through the same four kinds of work. The order is not strictly linear: revalidation recurs for as long as the design is changing, and documentation is most useful when it records reasoning as it happens.

E [01] ESTABLISH Identify which requirements apply and set the working assumptions: classification, code editions, compliance paths, the numbers the design will be built around.	V [02] VALIDATE Test those assumptions against the design as it actually exists: the plan, the massing, the assemblies, the model.	R [03] REVALIDATE Check again whenever the design, the program, the team, or the governing requirements change. This is the stage that repeats. ↳ REPEATS WHENEVER THE DESIGN CHANGES	D [04] DOCUMENT Record the requirement, the decision, and the reasoning, so the project team, the reviewer, and the next project can follow it.
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- A REQUIREMENT IS NEVER SIMPLY “DONE.” IT IS CURRENT, OR IT HAS NOT BEEN CHECKED SINCE THE LAST RELEVANT CHANGE.

NINE COMPLIANCE AREAS ACROSS SIX PHASES

Each mark identifies the kind of work that often dominates at that point, not a required sequence. Validation and revalidation may occur repeatedly, whenever the information needed to test a requirement becomes available or changes.

LEGEND E ESTABLISH V VALIDATE R REVALIDATE D DOCUMENT

COMPLIANCE AREA	[01] CONCEPT / PRE-DESIGN	[02] SCHEMATIC DESIGN	[03] DESIGN DEVELOPMENT	[04] CONSTRUCTION DOCUMENTS	[05] PERMIT / REVIEW	[06] CONSTRUCTION ADMINISTRATION
[01] OCCUPANCY AND USE IBC Ch. 3 and mixed-occupancy provisions	E Classify intended uses from the program. Flag mixed-occupancy conditions and the likely approach: accessory, separated, or nonseparated.	V Test the classification against the actual plan: room uses, occupant loads, and accessory-area limits as spaces take shape.	R Recheck when the program moves: a meeting room picks up event use, a tenant changes, an accessory area outgrows its allowance.	D Code plans show occupancy by area, with occupant load calculations that agree with the current model.	R Reviewer questions about use or classification are resolved and carried through every dependent sheet.	R Owner-driven program revisions and tenant changes after permit can alter classification.
[02] CONSTRUCTION TYPE AND BUILDING SIZE IBC Ch. 5 and 6: height, stories, area	E Test allowable height, stories, and area for candidate construction types, including sprinkler types and frontage increases.	V Confirm massing against allowable area as floor plates, story count, and frontage are set.	R Recheck when area or story count changes, or when changes to structural framing, materials, or assemblies affect the selected construction type.	D Area calculations, construction type, and required element ratings recorded in the code analysis.	R Reviewer questions on area calculations, increases, and the separations used to justify them.	R Material and assembly substitutions checked against the required construction type.
[03] EGRESS AND LIFE SAFETY IBC Ch. 10	E Estimate occupant loads and exit counts. Set the stair, core, and exit-discharge assumptions the plan will be organized around.	V Test exit count, exit separation, common path, and travel distance against the emerging plan.	R Door swings, corridor widths, dead ends, and egress capacity rechecked as layouts, doors, and furniture are detailed.	D Life-safety plans: occupant loads, egress paths, travel distances, exit capacity, and signage.	R Egress comments rarely stay on one sheet. Trace each response back to every affected plan and schedule.	R Field changes to partitions, doors, hardware, and furniture layouts.

NINE COMPLIANCE AREAS ACROSS SIX PHASES

Areas 04–06 of 9. Marks show work that often dominates, not a required sequence.

LEGEND **E** ESTABLISH **V** VALIDATE **R** REVALIDATE **D** DOCUMENT

COMPLIANCE AREA	[01] CONCEPT / PRE-DESIGN	[02] SCHEMATIC DESIGN	[03] DESIGN DEVELOPMENT	[04] CONSTRUCTION DOCUMENTS	[05] PERMIT / REVIEW	[06] CONSTRUCTION ADMINISTRATION
[04] ACCESSIBILITY IBC Ch. 11, ICC A117.1, ADA Standards, Fair Housing, state requirements	E Identify which accessibility standards apply, and which state or federal requirements sit alongside the building code. Determine applicable requirements, including required accessible units, features, and spaces where relevant.	V Accessible routes, entrances, vertical access, and the distribution of accessible units or spaces in the plan.	V Clearances become testable as rooms are detailed: door maneuvering space, turning space, toilet room layouts, reach ranges. Recheck them every time a room is re-planned.	D Enlarged plans, mounting heights, and details that make the clearances buildable.	R Reviewer comments on clearances and counts carried back into plans, elevations, and details.	V Verify field dimensions, fixture substitutions, and hardware. Small changes erode clearances that were compliant on paper.
[05] FIRE RESISTANCE AND SEPARATIONS IBC Ch. 7 and rating tables	E Identify separations implied by the occupancy mix and construction type, and exterior wall ratings driven by fire separation distance.	V Locate fire walls, barriers, and shafts. Test exterior wall openings near property lines against allowable limits.	V Select rated assemblies. Locate doors, glazing, and penetrations. Check continuity where rated walls meet floors, roofs, and shafts.	D Rated wall plans, assembly references, opening protective ratings, and penetration and joint details.	R Reviewer comments on ratings and continuity resolved across plans, sections, and details.	V Submittals for doors, dampers, glazing, and firestopping checked against the required ratings.
[06] PLUMBING FIXTURES IPC Ch. 4 / IBC Ch. 29, or the locally adopted plumbing code	E Estimate fixture counts from occupant load and occupancy. Confirm which plumbing code the jurisdiction has adopted.	V Size and locate toilet rooms against required counts and travel distance to facilities.	R Recheck whenever occupant load or occupancy changes. Confirm accessible fixtures and separate-facility requirements.	D Fixture calculations and schedules that agree with the plans.	R Count and ratio comments reconciled with architectural and plumbing drawings.	R Revisit if tenant use or occupant load changes during construction.

NINE COMPLIANCE AREAS ACROSS SIX PHASES

Areas 07–09 of 9. Marks show work that often dominates, not a required sequence.

LEGEND **E** ESTABLISH **V** VALIDATE **R** REVALIDATE **D** DOCUMENT

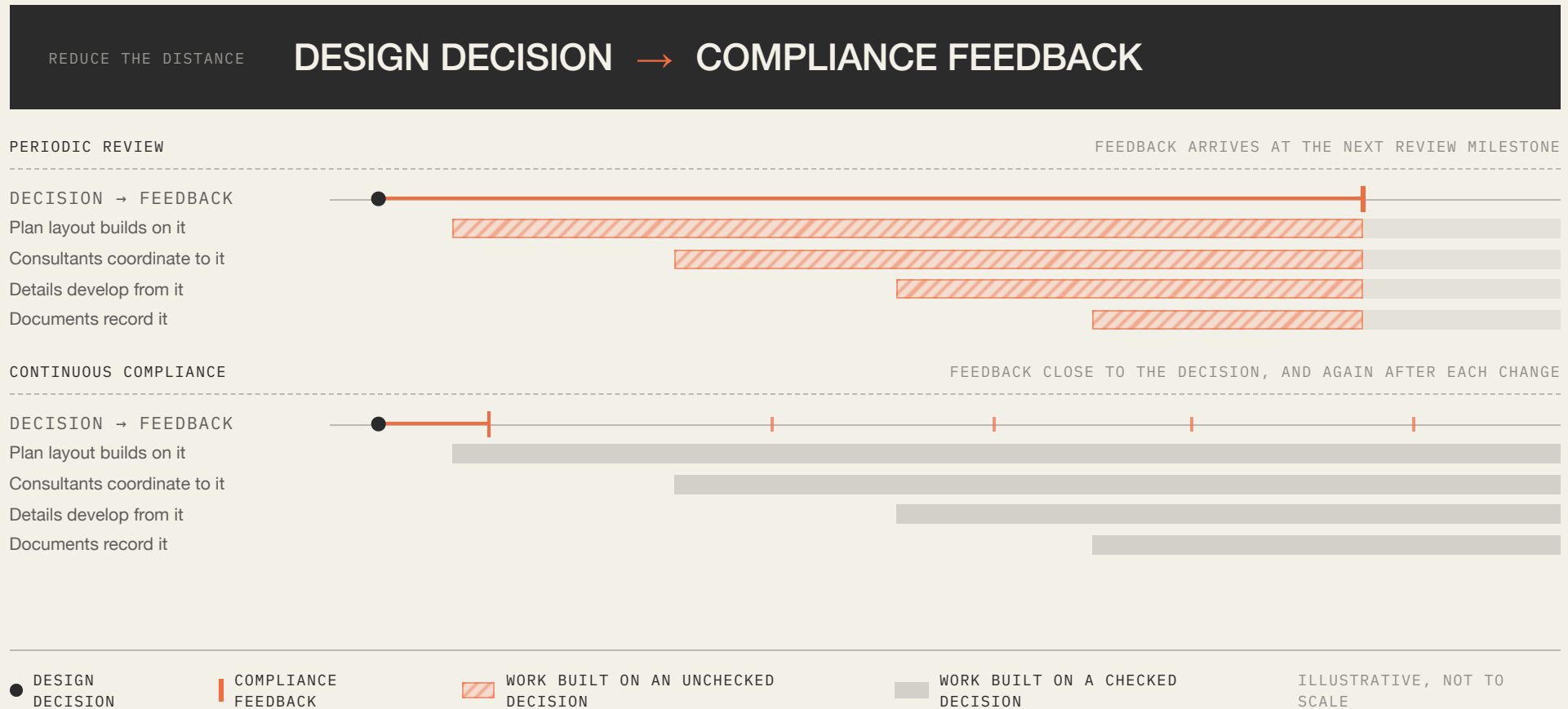
COMPLIANCE AREA	[01] CONCEPT / PRE-DESIGN	[02] SCHEMATIC DESIGN	[03] DESIGN DEVELOPMENT	[04] CONSTRUCTION DOCUMENTS	[05] PERMIT / REVIEW	[06] CONSTRUCTION ADMINISTRATION
[07] ENERGY IECC or ASHRAE 90.1, plus any local stretch code	E Identify the adopted energy code, climate zone, any stretch code, and the intended compliance path, such as prescriptive or performance.	V Test window-to-wall ratio, envelope, and orientation assumptions against the chosen path.	R Assemblies, glazing, and systems rechecked. A change of compliance path has consequences well beyond the envelope.	D Envelope values, assembly documentation, and the compliance forms the jurisdiction requires.	R Energy comments resolved across architectural, mechanical, and electrical documents.	V Glazing and insulation substitutions checked against documented values; commissioning where required.
[08] JURISDICTION-SPECIFIC REQUIREMENTS AND AMENDMENTS Adopted editions, local amendments, state codes, local interpretations	E Confirm adopted code editions, local amendments, and applicable state codes. Note known local interpretations and unusual conditions.	V Test unusual conditions against local practice, through pre-application meetings where the jurisdiction offers them.	R Monitor adoption and effective dates. The governing edition at permit may differ from the edition assumed at pre-design, depending on jurisdiction-specific transition and vesting rules.	D The code analysis cites the adopted editions and amendments, and records any interpretations or agreements reached.	R Reviewer interpretations are recorded and carried back into the design, not only into the response letter.	D Inspector interpretations and approved alternates recorded for this project and for the next one in the same jurisdiction.
[09] DOCUMENTATION AND COORDINATION Code analysis, life-safety plans, consultant drawings, specifications	E Decide where code assumptions will live and who owns them. Start the code analysis as a working document, not a deliverable.	D Record early assumptions with the reasoning behind them, not only the conclusion.	V Coordinate structural, MEP, and fire protection drawings against the code assumptions they depend on.	D Code sheets, life-safety plans, and specifications agree with each other and with the model.	R Every comment traced from response to the affected sheets and model elements.	D RFIs, substitutions, and field changes with code implications recorded with their rationale.

COMPLIANCE CHANGES AS THE DESIGN CHANGES

Compliance is not simply something that happens at the end of a phase. Early assumptions about occupancy, egress, accessibility, fire separation, and other requirements influence downstream design decisions.

When compliance feedback arrives significantly after the decision that created the issue, other work may already depend on that decision. The plan has been laid out around it, consultants have coordinated to it, details have been developed from it, and the documents describe it.

The opportunity is therefore not only to make review faster. It is to reduce the distance between a design decision and the compliance feedback on it. That distance is measured in dependent work, not only in days, which is why the same issue can be a quick correction in one week and a **rework** problem a month later.



A ROOM THAT CHANGES USE

Thresholds reflect recent IBC editions. Confirm against the adopted code and amendments.

[01] SCHEMATIC DESIGN

A 900 sq ft training room in an office building is planned as part of the business occupancy. Its calculated occupant load stays below 50. Assuming the applicable common-path limits and other egress conditions are satisfied, a single exit access doorway can serve the room, and the door may swing into the room.

[02] DESIGN DEVELOPMENT

The owner asks for the room to host events. At the applicable occupant-load factor for tables and chairs, its calculated occupant load is now roughly 60. At 900 square feet and an occupant load of 50 or more, the room no longer qualifies for the IBC's small accessory assembly exceptions and would generally be classified as Group A.

[03] WHAT NOW DEPENDS ON IT

- A second exit or exit access doorway from the room, with the required separation where applicable.
- Egress doors serving the room swinging in the direction of egress travel, with panic or fire exit hardware where required.
- Corridor egress capacity and plumbing fixture counts recalculated with the new load.
- A decision on how the Group A space relates to the rest of the building: an accessory occupancy if the area limits allow it, separated occupancies, or a nonseparated analysis applying the more restrictive requirements.

THE POINT

None of this is hard to resolve the week the owner asks. It is harder once the adjacent rooms, the corridor, the door schedule, the plumbing layout, and the consultants' drawings have developed around a single-exit room. The code question did not change. The amount of work depending on the answer did.

FIVE PLACES FEEDBACK FALLS BEHIND THE DESIGN

The distance between decision and feedback rarely comes from carelessness. It comes from how compliance work is structured: who holds the assumptions, what gets checked, and when.

[01] ASSUMPTIONS WITHOUT AN OWNER An early classification or occupant load is set in a meeting and never written down with its reasoning, so no one knows to recheck it when the program moves.	[02] CHECKING AN OUTPUT INSTEAD OF THE DESIGN Review happens on an exported set while the model keeps moving. By the time comments come back, they describe a version of the building that no longer exists.	[03] CHANGES THAT ARRIVE FROM OUTSIDE Consultant coordination, value engineering, and owner requests change the design without anyone asking which code assumptions they touch.	[04] KNOWLEDGE HELD BY A FEW PEOPLE The firm knows how a jurisdiction reads a provision, but only because one senior architect remembers. Everyone else finds out at review.	[05] FINDINGS WITHOUT A TRAIL A comment is resolved on one sheet and never traced to the other sheets, schedules, and model elements built on the same decision.
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HOW CONTINUOUS IS YOUR COMPLIANCE PROCESS TODAY?

Ten prompts for a project team or a practice leadership meeting. There is no score. The statements you can't confidently check are where the distance between decision and feedback is likely longest.

PROJECT _____ TEAM _____ DATE _____

- | | |
|--|--|
| ☐ 01 We identify applicable requirements early in design. | ☐ 06 Jurisdiction-specific interpretations are available across the firm. |
| ☐ 02 Compliance is revalidated as the model changes. | ☐ 07 Code knowledge is not dependent on knowing which senior architect to ask. |
| ☐ 03 Architects receive feedback close to the point of the design decision. | ☐ 08 Junior architects can understand why an issue was identified, not simply that something needs to change. |
| ☐ 04 Findings are connected to the underlying requirement. | ☐ 09 Teams can apply compliance requirements consistently across projects. |
| ☐ 05 Previous compliance decisions and their rationale are accessible to project teams. | ☐ 10 We can identify compliance issues before substantial downstream work depends on the affected decision. |

STATEMENTS WE COULD NOT CHECK, AND WHERE THE DISTANCE IS LONGEST FOR US

[07 • TRY IT ON ONE ACTIVE PROJECT]

THE EXERCISE

Pick a decision made last month. Then ask two questions.

THE DECISION

DATE MADE

01

HOW LONG DID IT TAKE TO LEARN WHETHER IT COMPLIED?

02

HOW MUCH WORK WAS COMPLETED BEFORE YOU KNEW?

FROM PERIODIC REVIEW TO CONTINUOUS COMPLIANCE

Traditional code workflows depend heavily on periodic review. Kestrel brings that feedback loop into the building model: **continuous compliance** directly against the design as it develops.

Kestrel runs inside Revit and evaluates structured code requirements against the model. Individual checks can run in about thirty seconds, making it practical to recheck requirements throughout design rather than waiting for a review milestone. Each finding identifies the relevant model element and cites the governing code provision from Kestrel's licensed ICC code content.

The goal is not to automate architectural judgment. It is to give architects better information when they exercise that judgment.

KESTREL CHECKS THE CODE. ARCHITECTS KEEP THE JUDGMENT.

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SCAN TO SCHEDULE