



**Construction Industry  
Licensing Board of Palm  
Beach County (CILB)**

2300 North Jog Road,  
Suite 2W-61  
West Palm Beach, FL 33411  
(561) 233-5525



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Custom Cleaning and Management  
Inc.

February 28, 2023

To the Florida Legislature:

On behalf of the Palm Beach County Building Code Advisory Board and Construction Industry Licensing Board, we are writing this letter to express our concerns with what our respective boards have determined to be a flawed piece of legislation. House Bill (HB) 735, enacted in 2021 and effective this July, prohibits local contractor licensing authorities from requiring licensing for job scopes that do not substantially correspond to a job scope at the state level. Furthermore, HB 735 restricts local jurisdictions from creating new licenses or modifying its existing ones. We have held several publicly noticed meetings to discuss HB 735 and its troubling language, and we have listened to members of the public share their anxieties about the Bill's impact and what it means for their licensed businesses. Below we have compiled a list of the deficiencies, questions and concerns regarding HB 735, as expressed by members of the public (i.e. concerned citizens, licensed contractors and business owners) and our Boards during our meetings:

- HB 735 will reduce protection for customers against unlicensed activity and reduce measures of accountability.
- It will greatly reduce the quality and the standards required to perform contracting work across the State.
- It will limit remedies available to consumers for incomplete or poor work quality performed by unlicensed contractors.
- It will require formerly licensed contractors to compete with unlicensed contractors working in the same trade, without the same level of training and experience.
- It will make it more difficult for the public to distinguish between qualified and unqualified businesses.
- It will require previously licensed contractors to rely on Division I (GC, BC, or RC) contractors to pull permits, as building officials will still require licenses to pull permits.
- Division I Contractors will have to assume greater liability and purchase more insurance coverage to account for permits they otherwise would not be pulling if it were not for HB 735.



- HB 735's prohibition on creating new licenses or modifying current ones limits local jurisdictions ability to respond to updates and changes particular to their local industries and trades.
- It limits local jurisdictions ability to execute their mission of protecting the public, improving competency levels and providing the public access to skilled, reliable and safe tradesmen.
- The bill's language fails to provide a corresponding job scope for the trades that it expressly prohibits local licenses.
- The bill's language fails to provide a clear definition for "substantially correspond."
- The ambiguous language puts local jurisdictions at risk of violating the law due to no fault of their own, and it puts local licensees at risk of losing their licensed status due to misinterpretations of the law.

To address the issues enumerated above and to prevent further unintended consequences, we are requesting that the Legislature rescind HB 735 in its entirety. If the legislature is not inclined to rescind, we are alternatively in favor of amending the law in its current form to clarify and account for the ambiguities and the unanswered questions that local agencies and members of the public are grappling with. In that same vein, we are requesting that the effective date of HB 735 be extended from July 1, 2023 to July 1, 2024.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read "G. Kelly", is written over a horizontal line.

Gerald Kelly, Chairman  
Construction Licensing Board

CC: Senator, Kathleen Passidomo  
Senate President  
409 The Capitol,  
404 S. Monroe Street, Tallahassee, FL 32399-1100

Representative, Paul Renner  
Florida House Speaker  
420 The Capitol,  
402 S. Monroe Street, Tallahassee, FL 32399-1300



Senator, Joe Gruters, Chair  
Committee on Regulated Industries  
525 Knott Building  
404 S. Monroe Street, Tallahassee, FL 32399-1100

Representative, Bob Rommel, Chair  
Commerce Committee  
303 House Office Building  
402 S. Monroe Street, Tallahassee, FL 32399-1300

Representative, Tyler I. Sirois, Chair  
Regulatory Reform & Economic Development Subcommittee  
303 House Office Building  
402 S. Monroe Street, Tallahassee, FL 32399-1300