INTERNATIONAL CODE COUNCIL, INC. (ICC)

Federal Funding Record, FY2008–FY2025

Shared Leadership Across NIBS And RESNET Through Federal Funding

About ICC

The International Code Council, Inc. (ICC) is a private, non-profit 501(c)(6) trade association that develops and publishes the I-Codes (including the IBC and IRC) adopted by most U.S. jurisdictions as the basis for local building codes. ICC also operates ICC Evaluation Service (ICC-ES) for product evaluation and ICC-NTA/IAS for certification and accreditation. ICC is, by far, the largest and best-funded organization in this report series: per its FY2024 IRS Form 990, ICC reported $109,907,356 in total revenue, 86.7% ($95,286,999) from program services, with contributions comprising just 0.3%. Federal funding, by contrast, is a small fraction of ICC's overall revenue — $4,347,960 cumulative since FY2008, against roughly $1.4 billion in cumulative organizational revenue over the same period.

Purpose of Report

This report documents the federal funding ICC has received based on prime award records reported to USASpending.gov, and establishes ICC's own leadership as the hub connecting the organizations profiled elsewhere in this series — NIBS and RESNET — through shared executives and board appointments.

Shared Leadership Across NIBS and RESNET

Four ICC executives hold, or have held, senior roles at NIBS and/or RESNET simultaneously:

Individual	ICC Role	Affiliated Organization Role
Dominic Sims	Chief Executive Officer of ICC (2012–2024, counting predecessor roles from 2003)	**NIBS Board of Directors,** 2019–2022; 2025–2028 (Term began October 1, 2025)
John “JC” Hudgison	ICC Board Member (as of 07/2024, per ICC's own IRS Form 990); Chair, ICC Emerging Leaders Membership Council	**NIBS Board of Directors**; founding past chair, NIBS Off-Site Construction Council
Ryan M. Colker	VP, Innovation, ICC; Executive Director, Alliance for National & Community Resilience (ANCR)	**Former VP at NIBS** (Consultative Council, multiple councils); Chair, NIBS Off-Site Construction Council (2023–2025)
Mark Johnson	Chief Operating Officer of ICC (previously EVP, Content & Service Group; with ICC/predecessor ICBO over 30 years)	**President, RESNET** Board of Directors (appointed 2023, term through Dec. 31, 2026); RESNET board member since 2017

Overview

Since Fiscal Year 2008, ICC has received a combined total of $4,347,960 in federal obligations from 10 federal agencies, led by the Department of Energy — driven largely by a single $2,561,075 cooperative agreement in FY2023. Figures are drawn from prime award transaction records on USASpending.gov.

Who Funds ICC

Funding Agency	Total (2008–present)
Department of Energy	$3,316,444
Department of Commerce	$314,177
Department of Defense	$250,994
Department of Homeland Security	$133,322
General Services Administration	$99,299
Department of State	$98,936
Department of Agriculture	$96,446
Department of Health and Human Services	$32,950
Department of Housing and Urban Development	$4,397
Department of Veterans Affairs	$995
TOTAL	**$4,347,960**

Funding Timeline, FY2008–FY2025

Fiscal Year	Federal Obligations	Share of Total
FY2008	$63,688	1.5%
FY2009	$70,947	1.6%
FY2010	$184,385	4.2%
FY2011	$90,026	2.1%
FY2012	$96,093	2.2%
FY2013	$94,793	2.2%
FY2014	$3,279	0.1%
FY2015	$2,647	0.1%
FY2016	$4,397	0.1%
FY2017	$119,299	2.7%
FY2018	$16,370	0.4%
FY2019	$18,239	0.4%
FY2020	$274,577	6.3%
FY2021	-$37,133	-0.9%
FY2022	-$3,082	-0.1%
FY2023	$2,561,075	58.9%
FY2024	$38,749	0.9%
FY2025	$749,611	17.2%
TOTAL, FY2008–FY2025	**$4,347,960**	**100.0%**

Figures reflect net obligations by fiscal year, including deobligations (negative values in FY2021 and FY2022). The FY2023 spike reflects a single $2,561,075 DOE cooperative agreement (Award DEEE0010935, "Codes: Code Official Digitization and Efficiency Support").

Concerns

Antitrust and Regulatory Capture Concerns: ICC as a Vertically Integrated Monopoly Operating in Plain Sight

The International Code Council, Inc. (ICC) is a private 501(c)(6) trade association formed in 1994 through the merger of three legacy regional model code organizations. It develops and publishes the I-Codes (including the widely adopted International Building Code and International Residential Code), which serve as the foundational model building codes for most U.S. jurisdictions. Beyond code development, ICC operates a vertically integrated "Family of Solutions" ecosystem that spans standards creation, product evaluation, accreditation, certification, training, digital code access, and enforcement-related services.

Key components include:

- **ICC Evaluation Service (ICC-ES)**: Issues reports verifying that building products meet ICC codes.
- **ICC-NTA / International Accreditation Service (IAS)**: Provides accreditation for testing/inspection firms and certifies programs (including RESNET's HERS raters).
- **ICCNTA (formerly NTA Inc., acquired 2019)**: Specializes in testing, engineering, inspection, and certification for off-site construction and building products.
- **ICC Digital Codes**: Controls the proprietary platform for accessing codes, commentaries, and state-specific versions.
- **S.K. Ghosh Associates & General Code**: Deliver technical training and codification services to local governments.

This structure positions ICC not merely as a standards developer but as a central market gatekeeper that participates across multiple stages of the building regulatory and commercial lifecycle.

Network Integration and Federal Ties

ICC maintains significant influence through leadership overlaps and shared governance with federally funded entities such as NIBS (a Congressionally chartered institute) and RESNET. ICC has itself received **$4,347,960** in cumulative federal obligations since FY2008 from multiple agencies.

Structural Antitrust and Capture Issues

Critics, including advocates in the tiny home and off-site construction sectors, describe ICC's model as a **hub-and-spoke arrangement** and **closed-loop governance system** that raises serious concerns under antitrust principles and standards development best practices:

1. **Vertical Integration and Economic Dependency**: ICC controls code authorship, product evaluation, accreditation, certification, training, and digital access. Third-party inspectors, testing labs, and raters depend on ICC-related accreditations and evaluations for market access. This creates structural economic pressures that can chill dissent, reduce competition among service providers, and erect barriers to entry for independent or innovative actors.
2. **Closed-Loop Governance**: Building officials often serve simultaneously on ICC committees and boards (voting on codes), adopt those codes locally, and receive ICC training and certification. This blurs lines between private standard-setting and public regulation.
3. **Co-Branding, Duplication, and Exclusionary Practices**: ICC engages in joint standards development and co-branding (e.g., with trade associations on off-site construction and small residential/tiny house standards). Critics allege these efforts have involved vote-stacking, group boycotts of competing standards (such as ASTM efforts), disregard for WTO coherence principles against unnecessary duplication, and insistence on proprietary ICC materials for certification. Such practices can suppress alternative standards and favor industrial-scale incumbents.
4. **Material, Cognitive, and Cultural Capture**:

- **Material Capture**: Complex, costly compliance requirements create barriers that disadvantage small-scale, independent, or artisan builders.
- **Cognitive Capture**: Local officials face information asymmetry and often rely heavily on ICC "experts."
- **Cultural Capture**: Shared professional networks normalize consolidation as "progress," while critics face professional and economic risks for challenging the system.

ICC's dominant market position—combined with its federal funding, leadership overlaps with Congressionally chartered and federally supported entities, and control over a compliance ecosystem—functions as **coordinated control of a closed compliance marketplace**. This setup risks regulatory capture, reduced innovation, higher costs for consumers and builders, and exclusion of smaller players in housing. These issues are particularly relevant to priorities around affordable housing, energy efficiency, resilience, and off-site/modular construction.

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