

November 28, 2022

Re: Upcoming Deadlines (Condominium and Cooperative Associations). Revised Nov. 28, 2022

This checklist is intended to assist with identifying and addressing upcoming deadlines imposed by the Florida Legislature, to include deadlines associated with the recently enacted Senate Bill 4-D.

- **January 1, 2023**: Deadline for Florida condominium and cooperative associations to report certain information regarding the size and makeup of the building(s) within the community to the Department of Business and Professional Regulation (“DBPR”). The DBPR reporting form is accessible via the following link:

<http://www.myfloridalicense.com/DBPR/condos-timeshares-mobile-homes/building-report>
- **January 1, 2024**: As of this date, the local authority having jurisdiction may enforce the fire sprinkler system / emergency life safety system requirements applicable to high-rise buildings.¹
- **January 1, 2024**: Deadline for non-compliant high-rise buildings² to apply for a permit for the installation of a radio frequency strength / two-way radio communication enhancement system.
- **December 30, 2024**: Deadline for condominium and cooperative buildings that are three stories or higher and have a certificate of occupancy issued on or before July 1, 1992 to obtain a milestone inspection.³ If the certificate of occupancy for the building was issued after July 1, 1992, the milestone inspection deadline depends on the building’s proximity to the coastline. See our summary of Senate Bill 4-D for more information.⁴ Subsequent

¹ “High rise building” as that term is used herein means a building with an occupied floor located more than 75 feet above the lowest level of fire department vehicle access.

² See footnote #1.

³ There is an exception for single-family, two-family, and three-family dwellings with three or fewer habitable stories above ground. Check with legal counsel if you believe this exception may apply to your community.

⁴ A copy of our summary of Senate Bill 4-D is posted on our blog – www.rpqlaw.com/news.

inspections must occur every ten years.

- **December 31, 2024**: Deadline for condominium and cooperative buildings three stories or higher to obtain a structural reserve study. Subsequent structural reserve studies must be obtained every ten years.
- **December 31, 2024**: Deadline for condominium and cooperative buildings to establish and fund structural reserves in accordance with the above-referenced structural reserve study.⁵ Structural reserves may not be waived or reduced, nor allocated for any other purpose.
- **January 1, 2025**: Deadline for high rise buildings⁶ to comply with minimum radio frequency strength / two-way radio system enhancement communication requirements.

We present the material above for general informational purposes only. You should not rely upon it as legal advice intended to address a specific legal issue or question. This document does not constitute the rendering of legal advice and does not create any attorney-client relationship.

⁵ The DBPR has taken the position that this requirement applies to all buildings; not just those that are three stories or higher.

⁶ See footnote #1.