



## Code Updates Impacting Cinema Operations

*July 2025*

Cinema United partners with Code Consultants, Inc. ([CCI](#)), a leading engineering and consulting firm that provides expert guidance to ensure that cinema designs and operations comply with evolving building codes and safety standards. This report includes the latest updates from CCI on key code changes in areas such as fire/life safety, structural requirements, and accessibility to provide an overview of current and upcoming regulatory developments that might affect the cinema industry.

Exhibitors are encouraged to reach out with any code change needs or concerns—CCI will compile and submit these proposals to the International Code Council (ICC) on behalf of Cinema United.

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ICC held Group B code change hearings from April 27 through May 6, 2025. The ICC has changed the way it handles code change proposals from a two-hearing format to a three-hearing format. This was the first hearing for Group B. The second will be in October from 22-30 in Cleveland, Ohio. During these two committee hearings only the code change committee votes on the proposals. At the final hearing, ICC membership code officials vote on the final action.

**Background:** Group A code change committee hearings took place last year. At the final action meeting, both Group A and Group B items will be heard. This combined hearing will take place in April 19-28, 2026, in Hartford, Connecticut. The list below is a breakdown of which committees are part of which Group:

- **Group A**

- International Building Code (IBC) – Egress (Chapters 10 and 11)
- IBC – Fire Safety (Chapters 7, 8, 9, 14 and 26)
- International Fire Code (IFC)
- International Fuel Gas Code (IFGC)
- International Mechanical Code (IMC)
- International Plumbing Code (IPC)
- International Residential Code (IRC) – Mechanical
- IRC – Plumbing
- International Swimming Pool Code (ISPC)

- International Wildland Urban Interface Code (IWUIC)
- **Group B**
  - Administrative (Chapter 1 of all codes except IECC, IgCC and IRC)
  - IBC – General (Chapters 6, 12, 13, 27-34)
  - IBC – Structural (chapters 15-25)
  - International Existing Building Code (IEBC)
  - ICC Performance Code
  - International Property Maintenance Code (IPMC)
  - IRC – Building
  - International Zoning Code (IZC)
  - International Green Construction Code (IgCC)

At the final hearings, only proposals that have comments will be heard. All those without comments will be block voted to accept the committee recommendation (i.e., committee votes).

**Action:** The most recent code change hearings for the Group A IBC proposals were discussed October 23 through 28, 2024, in Long Beach, California. A number of code changes were introduced and heard. Most of the proposals this current cycle consist of refinements of previous items with limited application to Cinema United interests.

During the recent Group B hearing a number of proposals were presented that are within the concerns of Cinema United. CCI spoke on a number of these in support of Cinema United's interests. The list below is a summary of those items and the actions taken by the code change committee. Most of the proposals would have little, if any, affect on Cinema United's interests.

ID	Issue	Action	Comment
G10 – G13	Would add a number of definitions about Electric Vehicle charging stations which would provide consistency in discussions and code application.	D	The committee felt that definitions with code requirements is the cart before the horse.
G28	Would delineate two types of stages – Type A (with scenery) and Type B (without scenery) which could affect a limited number of theaters where an actual stage is provided near the screen.	D	The committee did not think it necessary to distinguish between the two or have different requirements for each.
G111	Would allow Type III construction to have unlimited area buildings increasing the options for construction using combustible framing internal to the structure.	D	The committee did not think expanding to combustible construction was safe.
S74	Would increase the live loads in Assembly occupancies where crowding is possible.	D	The committee felt it was too subjective and could

ID	Issue	Action	Comment
	This would be subjective but would increase safety in areas where falls are possible.		increase construction costs unnecessarily.
E21	Would change each occurrence of “floor” or “level” to “story. This would place the code out of step with the federal standards for accessibility and possibly allow auditorium design to be approved by the building officials and not comply with ADA.	D	The intent was to simplify language. We will work with the proponents to see if other text is possible.
EB36	A new provision that would require new plumbing fixtures where an alteration increases the occupant load by more than 20%. Likely not a typical concern but could be in some alterations.	D	There was some support for this but was considered excessive by some on the committee and too vague by others.
EB49	Would allow existing buildings with non-compliant height and/or area to increase in height or area by specific special construction methods.	D	Committee felt this was too much and not appropriate for all occupancies.
PM39	Language was revised to state more simply that accessibility must be maintained in existing buildings.	AMC1	Approved with one modification that did not change the intent.

G# IBC – General  
 S# IBC – Structural  
 EB# IEBC  
 PM# IPMC  
 D Disapproved  
 AMC1 Approved as Modified by the Committee (First Action Hearing)

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## FIRE / LIFE SAFETY

The following section includes additional information and updates specific to Fire/Life Safety and Accessibility related building code proposed changes that may impact future theater design and alteration.

- A proposal for IBC Section 917.1 suggests conducting a mass notification risk analysis in accordance with NFPA 72 prior to construction of any new buildings requiring a fire alarm system. Previously, this was only required for college campuses and Group E school campuses.
  - This change is suggested because the risk of death and injuries is shifting from fire incidences towards incidences of violence. The mass notification

system will allow occupants to go into lock-down mode, rather simply evacuating the building in the event the fire alarm system is activated. If accepted, this may increase the costs of construction for theaters utilizing lockdown as a planned emergency response.

- Note that presently, the current adoption cycle is approximately 2/3 complete for means of egress and life safety requirements. The final hearing will be completed in the public comments section in 2026. The proposed agenda will be available for review in March of 2026.

## **ACCESSIBILITY**

- **ICC – 2024 and ANSI A117.1 – 2017 Supplement**

- The 2024 edition of the IBC includes the requirement for adult changing stations in a manner similar to requirements in Ohio — when Family Assist toilet rooms are required. CCI is aware that a few jurisdictions have adopted the 2024 IBC (see below), but it is not in widespread usage yet. Specific design requirements are included in the Supplement to the 2017 A117.1 standard.
- A free copy of the Supplement is able to be viewed at: <https://codes.iccsafe.org/content/ICCA117.12017P6> The text cannot be copied but can be read.

- **Electric Vehicle Charging Stations**

- Requirements to provide electric vehicle charging stations (EVCS) are not widespread. The IBC contains requirements for “where provided” similar to how the requirements exist in the California Building Code. The threshold is different and is being considered to be different when the federal guidelines are adopted. However, given the current conditions of downsizing federal agencies and regulations, it is not likely that new federal EVCS guidelines will be forthcoming.
- Specific details for the design of EVCS is included in the 2017 edition of the ANSI A117.1 standard. Draft guidance from the US Access Board has led to a proposal to change some of the requirements in the A117.1.

- **ANSI A117.1 – 2025**

- The A117.1 committee is working through the proposals for changes. The technical changes to Chapters 1 – 11 are complete. A second pass at the later chapters is still possible and a few items are being brought up for

reconsideration. The definitions committee and the editorial committee have yet to complete their work. However, that committee is expected to finish before the end of 2025.

- The proposals for the new scoping Appendix are still being reviewed and discussed. The Appendix will not be a part of the new edition. Completion of the Appendix is proving to be more challenging than anticipated; it will be included in the next edition. The intent with the Appendix is to create a scoping section that could allow the A117.1 standard to be a standalone accessibility code and possibly adopted by Department of Housing and Urban Development (HUD), the Department of Justice (DOJ) and other federal agencies as complying with their needs.

- **ADA Design Standards**

- As noted, the federal agencies are not given the authority to expand any regulations by the current administration. Therefore, it is unlikely that any new rules will be forthcoming. The Access Board has not given staff any direction that they would be updating the current rules and standards.

- **Adult / Baby Changing Stations Requirements for Different States**

- **Arizona (HB 2113):** New restrooms in buildings must have adult changing stations. Note that this only applies to Title II facilities, so it is unlikely to affect Cinema United members.
- **California (CA AB 742 (2015) and AB 1127 (2025)):** Adult changing stations are required at commercial places of public amusement. Baby changing stations are required in all buildings (including theaters) with an occupant load of 60 or more. This includes all new construction and renovations where the cost is \$10,000 or more.
- **Florida, Miami-Dade County (Code of Ordinances Sec 8A-114):** Baby changing stations are required in both men and women toilet rooms in theaters of new construction and alterations unless the cost is greater than 10% of the alteration.
- **Hawaii, Honolulu (Ordinance 15-38):** Baby changing stations are required in all toilet rooms for all new theaters and for renovations where the cost for a toilet room renovation is \$10,000 or more or the total renovation cost is \$50,000 or more.
- **Illinois (IL SB 1089 and PA 101-0293):** Adult changing stations are required in all state owned or operated buildings (unlikely to affect Cinema United

members). Baby changing stations are required in both men's and women's toilet rooms and in one room available to both men and women.

- **Maryland (SB 61):** Adult changing facilities will be required in all public buildings. The text is vague in that it mentions public buildings as being public spaces for gathering or amusement, but the remainder is related to Title II (state and local services), not Title III (public places and businesses) facilities.
  - Baltimore (Ordinance 18-182) – All assembly occupancy facilities (theaters) must have baby changing stations in men's, women's and one room available to both men and women.
- **Michigan (MCL Sec. 125.1508a(9)):** Where baby changing tables are provided, they must be provided in both men's and women's toilet rooms.
- **Nevada (AB 241 2017):** Each building must be provided with at least one baby changing table available to men and one available to women.
- **New Hampshire (HB628):** A universal changing station must be provided for all movie theaters serving 1,500 or more people per day.
- **New Mexico (HB 205 2019):** A place of public accommodation must provide a baby changing station in each restroom in all new construction and where renovations are necessary for compliance with state, local, and federal accessibility standard.
- **New York (A3940):** Baby changing stations are required in all toilet rooms.
  - New York City (Bill 1241 – 2016) – New or renovated buildings that contain places of public accommodation must provide diaper changing tables that are accessible to all persons regardless of gender.
- **Tennessee (HB 0905 ):** In 2022, the Tennessee General Assembly allocated \$1 million to fund grants—now up to \$10,000 each—for installing powered, height-adjustable adult-size changing tables in public and community facilities. A 2024 law expanded the program by defining qualifying equipment and broadening eligibility, helping parks, rest areas, businesses, and nonprofits add accessible restrooms.
- **Texas:**
  - **Dallas (City Code Sec 19-38):** Baby changing stations are required in new theaters and theaters undergoing major renovations.

- **San Antonio (Ordinance 2020-03-05-0166):** A baby changing stations is required in all new Group A buildings and in new renovations where a new restroom is built, the area of an existing restroom is increased by 50 square feet, or when the number of fixtures in a restroom is increased.
- **Utah (HB 303):** A building owned by a state government entity or by a political subdivision of the state that allows access to the public must provide for diaper changing facilities. This is unlikely to affect Cinema United members.
- **Washington, Spokane (C35755):** Baby changing stations are required in city operated facilities.