

NEW PROJECTS ASSOCIATED WITH EXISTING UNCERTIFIED PROJECTS

Disciplines:	All	History:	Revised 02/13/19	Revised 03/22/13
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PURPOSE: This Interpretation of Regulations (IR) clarifies the Division of the State Architect (DSA) review and approval of projects associated with uncertified school buildings.

BACKGROUND: A certification of compliance is issued by DSA for a public school building project when the work of construction has been completed in accordance with the requirements of the Field Act, Education Code Sections 17280-17316 and Sections 81130-81147. Any building project that has not received a certification of compliance in accordance with Section 4-339, Part 1, Title 24, California Code of Regulations is considered “uncertified.”

POLICY: New work involving uncertified projects cannot be approved by DSA until the issue of certification is resolved. DSA will not approve (stamp out) plans and specifications for alteration and/or addition projects on, or utilizing portions of, uncertified projects.

1 PROJECTS EXEMPTED FROM THIS POLICY: Projects exempted from this policy are limited to FLS and security alteration projects of the following types:

- Campus- or system-wide fire alarm upgrade or replacement.
- Upgrade or replacement of the uncertified building’s fire alarm system.
- Security cameras and related wiring and equipment installation or upgrade.
- Security hardware (door lockset) upgrade.

1.1 Implementation: DSA will review and approve these alteration projects on uncertified buildings as described in Section 1.1 above provided the school district submits a letter to DSA signed by the school district superintendent, stating that the school district is actively seeking certification of all uncertified projects within the district, including a timeline.

DSA written approval of the alteration plans and specifications issued to the school district will specify:

- The approval is only for the fire alarm upgrade or replacement project, or security camera installation or replacement project, or security hardware (door lockset) upgrade, and
- The building itself remains uncertified.

1.2 Disclosure: The scope of the project and the uncertified buildings on the alteration project must be clearly identified in the following manner:

- The scope of the alteration project shall be clearly shown on the cover sheet or index sheet of the plans.
- The following disclosure statement shall also be shown on the cover sheet or index sheet:

“DSA approval of these plans shall not be construed as the Certification of Compliance for the following building(s) as required by the Field Act, Education Code Section 17280-17316 and Sections 81130-81147.”

- Immediately after the disclosure statement, list all the uncertified buildings on the alteration project.

2 OTHER PROJECTS AFFECTING UNCERTIFIED BUILDINGS: DSA may begin review of other projects not identified in Section 1 above, associated with uncertified projects. However, DSA approval (stamp out) of the plans and specifications shall be withheld until the issue of certification is resolved.

APPENDIX – CLARIFYING SITUATIONS

Many situations occur that may or may not involve uncertified buildings/projects to the extent that a proposed new project may be affected. This appendix provides examples of these situations in an attempt to provide clarity, uniformity and consistency in the application of this IR.

Example #1:

- Q.** The district submits a project for a fire alarm upgrade and/or fire alarm addition. The project requires connecting the new fire alarm system/components into a fire alarm panel that resides in an uncertified building.
- A.** See 1.1 “Implementation” above.
- B.** The new project submittal must include direction that the following two documents from NFPA 72 are to be completed and submitted prior to close out of the project.
1. Fire alarm system record of completion.
 2. Fire alarm system record of inspection and testing form.

Example #2:

- Q.** A school building is not certified and the district submits an application to DSA for an alteration or addition to that building.
- A.** DSA will accept the new application and provide plan review but will not issue project approval (stamp out) until and unless the issue of certification is resolved.

Example #3:

- Q.** The district submits an application to DSA for a new building but the new building depends on portions of an uncertified project to meet code compliance (e.g. compliance with California Building Code (CBC) 11B-202.4 Path of Travel Improvements for the new building identify elements such as restrooms and accessible parking that are part of an uncertified project, or reliance on a compliant fire alarm system, fire hydrants or fire sprinkler system, that is part of an uncertified project).
- A.** DSA will accept the new application and provide plan review but will not issue final approval (stamp out) until the associated project certification is resolved. (See also [Project Certification Guide](#) on DSA’s website for potential alternatives.)

Example #4:

- Q.** The district submits an application to DSA for a new project on a campus but the entire campus (or portions of the campus) is not certified.
- A.** As long as the new project does not depend on uncertified construction to meet code compliance (e.g. compliance with CBC 11B-202.4 Path of Travel Improvements for the new building identify elements such as restrooms and accessible parking that are part of an uncertified project, or reliance on a compliant fire alarm system, fire hydrants or fire sprinkler system, that is part of an uncertified project), DSA will accept the new project as a viable, project that is eligible for approval.

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Example #5:

- Q.** The district submits an application to DSA for a new classroom building but another ancillary building (gymnasium, administration building, shade structure, library etc.) is not certified.
- A.** As long as the new project does not depend on uncertified construction to meet code compliance (e.g. compliance with CBC 11B-202.4 Path of Travel Improvements for the new building identify elements such as restrooms and accessible parking that are part of an uncertified project, or reliance on a compliant fire alarm system, fire hydrants or fire sprinkler system, that is part of an uncertified project), DSA will accept the new project as a viable, project that is eligible for approval.

References:

California Code of Regulations (CCR) Title 24
Part 1: California Administrative Code, Section 4-339
California Education Code, Sections 17280-17316 and 81130-81147

This IR is intended for use by DSA staff and by design professionals to promote statewide consistency for review and approval of plans and specifications as well as construction oversight of projects within the jurisdiction of DSA, which includes State of California public schools (K–12), community colleges and state-owned or state-leased essential services buildings. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

This IR is subject to revision at any time. Please check DSA's website for currently effective IRs. Only IRs listed on the webpage at www.dgs.ca.gov/dsa/publications at the time of project application submittal to DSA are considered applicable.