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**BULLETIN: 2016 PRE-CHECK EXTENSION AND RENEWALS  
TO THE 2019 CBC**

Division of the State Architect (DSA) documents referenced within this publication are available on the [DSA Publications](#) webpage.

**PURPOSE**

The purpose of this bulletin is to provide adequate time for building manufacturers to prepare pre-check (PC) plans and obtain the DSA approval before required use of 2019 PC plans due to adoption of the 2019 California Building Code (CBC).

**1. 2016 PC PLANS EXTENSION**

All PC drawings and specifications that are approved for compliance with the 2016 CBC, Title 24, California Code of Regulations will be accepted with applications submitted to DSA through **June 30, 2021**. This deadline has been extended to allow manufacturers to accommodate their high demand while obtaining approval of site-specific project plans in compliance with the 2019 CBC.

Submission of PC Plans shall be in accordance with *PR 17-03: Project Submittal Appointment Process*.

With the exception of PC drawings and specifications as described in this bulletin, all other drawings and specifications included with project applications submitted to DSA on or after January 1, 2020 must comply with the requirements of the 2019 codes and referenced standards. An example of such drawings and specifications would include site drawings associated with the placement of the PC structure on the school site.

**2. ADDITIONAL REQUIREMENTS EFFECTIVE JANUARY 1, 2020**

The accessibility features indicated in any 2016 PC will be required to comply with the 2019 CBC when submitted to DSA for project-specific use. All drawings and specifications for the non-PC portion of a project submitted on or after January 1, 2020 must comply with the 2019 CBC, even if submitted with 2016 PC plans.

The structural design criteria (i.e., seismic, wind, etc.) indicated in any 2016 PC will be required to comply with the 2016 CBC design criteria and detailing requirements since that is the code edition for which the PC was approved. For projects utilizing a 2016 PC that require submittal and approval of a geohazard report by the California Geological Survey (CGS) in accordance with Interpretation of Regulations (IR) *A-4: Geohazard Report Requirements*, CGS must be advised at the time the report is submitted for review that the project involves use of a 2016 PC since CGS defaults to reviewing the current code in effect (2019 CBC). For any project involving a combination of 2016 PC structure(s) and 2019 CBC structure(s), the seismic and wind design criteria values must be clearly and separately noted on the construction documents for both the 2016 and 2019 CBC, respectively. If the project requires a geohazard report, then two separate reports should be submitted to CGS, with seismic parameters and recommendations in keeping with the distinct code versions.

**3. APPLICATION FOR 2019 PC APPROVAL**

The PC holder should submit a complete application package to DSA in accordance with the requirements of *PR 07-01: Pre-Check Approval*. A new application number will be assigned to the 2019 PC.

The 2019 PC application package must be submitted to the DSA regional office that has jurisdiction for the county in which the buildings will be manufactured. Questions regarding the

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expiration of PC drawings and specifications or the submittal process should be directed to the local DSA regional office.

**4. REQUIREMENTS FOR APPROVAL**

All 2019 PC plans and specifications must comply with all codes and referenced standards comprising the 2019 Title 24, California Code of Regulations, adopted by DSA.

DSA has developed structural design criteria documents as a tool for the responsible engineer to demonstrate code compliance. All criteria must be considered and incorporated accordingly in new or revised calculations and drawings.

See PR 07-01 for the requirements for PC approval. Note that PCs with an excess number of options should be broken into two or more smaller PCs in accordance with PR 07-01.

Attachment A to this bulletin outlines the additional submittal requirements to identify changes in plans and specifications related to code updates.

**5. PC DESIGNS REQUIRED BY CODE TO HAVE AUTOMATIC FIRE SPRINKLER SYSTEMS**

All PC designs that are required by code to have automatic fire sprinkler systems (AFSS) are subject to *PL 10-01: Plan Submittal Requirements: Automatic Fire Sprinkler Systems (AFSS)*. PC designs submitted to DSA for approval must include the AFSS; otherwise, over-the-counter review per *PL 07-02: Over-The-Counter Review of Projects Using Pre-Check Approved Designs* is not allowed.

**6. 2019 CALIFORNIA ENERGY CODE**

See *PR 18-02: Pre-Check (PC) Permanent Modular or Relocatable Building Designs CALGreen/Energy Code Compliance Review*.

**7. INCREMENTAL PROJECTS**

Per *IR A-11: Incremental Submittals*, a subsequent increment must be submitted within six months of DSA approval of a previous increment, and all increments must be submitted to DSA within 12 months of the date of submittal of the initial application. For increments for which the 2016 CBC is applicable, 2016 PC designs may be used for all increments provided the 12 months has not elapsed. For increments for which the 2019 CBC is applicable, 2016 PC designs may only be used for those increments submitted between January 1, 2020 and December 31, 2020 provided the 12 months has not elapsed.

**8. CODE REFERENCES REQUIRED ON PC COVER SHEET**

Following is the list of building codes and standards that must be included on the cover sheet of any PC project drawings submitted for approval under 2019 Title 24 of the California Code of Regulations adopted by DSA:

**TITLE 24 CODES:**

**2019 California Administrative Code (CAC)** (Part 1, Title 24, CCR)

**2019 California Building Code (CBC), Volumes 1 and 2** (Part 2, Title 24, CCR)

(2018 International Building Code with 2019 California amendments)

**2019 California Electrical Code** (Part 3, Title 24, CCR)

(2017 National Electrical Code with 2019 California amendments)

**2019 California Mechanical Code (CMC)** (Part 4, Title 24, CCR)

(2018 Uniform Mechanical Code with 2019 California amendments)

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**2019 California Plumbing Code (CPC)** (Part 5, Title 24, CCR)

(2018 Uniform Plumbing Code with 2019 California amendments)

**2019 California Energy Code** (Part 6, Title 24, CCR)

**2019 California Fire Code (CFC)** (Part 9, Title 24, CCR)

(2018 International Fire Code with 2019 California Amendments)

**2019 California Green Building Standards Code** (Part 11, Title 24, CCR)

**2019 California Referenced Standards Code** (Part 12, Title 24, CCR)

**REFERENCE CODE SECTIONS FOR APPLICABLE STANDARDS:**

**2019 CBC**, Chapter 35

**2019 CFC**, Chapter 80

**ATTACHMENT A**

**PROCEDURE FOR UPDATING 2016 PRE-CHECK DESIGN DOCUMENTS TO THE 2019 CODES**

**1. GENERAL**

A method for identifying changes to the approved 2016 PC drawings and calculations. This method is to be used only on the 2019 PC application submittal drawing review sets; markings shall be removed from the DSA-approved documents (stamped out or “record” set).

Written narratives to be included as part of the 2019 PC submittal describing each change to the drawings and calculations.

The method of mark-up and documentation described below streamlines the plan review process by allowing the DSA plan reviewer to focus on code-related modifications and manufacturer corrections, alterations, and additions being made.

**2. LIMITATIONS**

The procedures described in this Attachment are to be used only for 2019 PC applications that are a direct comparison to the approved 2016 PC design being replaced, and the calculations and drawings demonstrate satisfaction of the 2019 CBC and new design criteria. Minor additional modifications and additions in compliance with the 2019 CBC are allowed.

However, if major modifications or additions are being proposed to the approved 2016 PC design, contact the DSA Regional Office to arrange a meeting to determine if the new 2019 PC application can be efficiently reviewed as an *update*. If a *new* PC application must be submitted, a more comprehensive review is required.

For example, if a relocatable building PC is being updated to include a larger seismic ground motion option, that option would exceed the number of permissible seismic options in PR 07-01, requiring a new (separate) PC application and review as a new PC.

**3. EXTENT OF PLAN REVIEW**

DSA’s goal in plan review of 2019 PC application submittals is to enable plan reviewers to focus easily on items that are directly affected by any current code requirements or manufacturer changes only.

In general, calculations, drawings and details shown to satisfy the 2019 CBC and new design criteria that are identical from the approved 2016 PC and not affected by current code requirements (including referenced standards) or manufacturer changes will not be commented on unless authorized by a DSA supervisor or regional manager. Where a 2019 PC submittal is

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substantially identical to the approved 2016 PC and has only updates due to the 2019 codes and referenced standards and/or corrections due to errors, the plan review will confirm satisfaction of the 2019 CBC and new design criteria and will focus on those affected drawings, details and calculations. In addition, with DSA supervisor or regional manager approval, the plan reviewer may extend the review and comment on unchanged details or calculations if a known issue or condition exists that requires updating or modification.

If a 2019 PC submittal has an addition of a major option (see PR 07-01, Appendix A), the plan review for this type of submittal would be much more extensive. See Section 2: Limitations, above, for the handling of this situation.

#### **4. CHANGE IDENTIFICATION SYSTEM**

All existing clouds shown on the approved 2016 PC drawings shall be removed from the 2019 PC plan review set.

The 2019 PC plan review drawings shall be clouded with two unique and visually distinct symbols, one for each of two separate categories of changes, as defined below. Change the line type of the cloud as specified below.

Cloud identifiers shall be used on drawings for each of the change categories:

**CATEGORY A:** A **solid line** cloud will be used to identify the following:

- 2019 CBC related changes.
- Pickup of previously approved changes on the original 2016 approved documents.

**CATEGORY B:** A **dashed line** cloud will be used to identify the following:

- Manufacturer corrections to the drawings.
- Manufacturer revisions to existing details.
- Manufacturer additional details.
- Any other changes (i.e., deletions of details under 2016 approval). Clearly describe these changes.

#### **5. NARRATIVE OF CHANGES TO THE DRAWINGS**

Provide a written narrative in a separate letter-sized document describing individual changes. The document shall have a header on each page stating:

- The description of the PC that matches the drawings title sheet.
- Page number of the narrative.
- The date the document is updated.

Each change on the drawings shall have the following minimum description in the "Changes to Drawings" narrative:

- Number of the change assigned sequentially (Example: Item 1).
- Indicate the plan review discipline affected by the change, as applicable:
  - Structural Safety (SS).
  - Access Compliance (AC).
  - Fire and Life Safety (FLS).
  - CALGreen/Energy (HPS).

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- Sheet number where the change being described occurs (Example: A1.0).
- Description of changed item, such as Plan Type, Detail Number, Elevation Number, or Schedule as applicable (examples: Ceiling Plan, Detail A, Side Elevation, Finish Schedule).
- For changes driven by 2019 code compliance, provide code section number.
- For all other items, the “Changes to Drawing” narrative shall contain a description of what was changed and the reason for the change.
- Where a change to the drawings requires calculations, the “Changes to Drawings” narrative description shall note the appropriate calculation sheet number(s).

Clouding of the sheet number will indicate that the entire sheet is to be reviewed. The “Changes to Drawings” narrative shall describe all changes or additions individually.

### **6. 2016 PC COMPARISON SET**

Provide three (3) half-size sets (copies for SS, ACS and FLS) of the latest approved 2016 PC drawings that will serve as a direct comparison set for to the 2019 PC application submittal review.

### **7. CALCULATIONS**

A new set of complete calculations for the 2019 PC design, including updates and revisions to satisfy the 2019 CBC and design criteria, shall be submitted.

If the calculation set contains unchanged 2016 PC calculations in addition to revised or new 2019 PC calculations, submit both a complete set of combined calculations in addition to a copy of the revised or new calculations only under separate cover for the initial plan review.

If the engineer who is responsible for the 2019 PC calculations is different from the one responsible for the approved 2016 PC design, all calculations and drawings pertaining to the structural design shall be reviewed by DSA.

### **8. CALCULATIONS NARRATIVE**

Attach, with the calculations, a calculations narrative describing the calculation changes and additions. This narrative is in addition to the “Changes to Drawings” narrative noted in Section 5.

The calculations narrative shall identify the following:

- 2019 CBC code-related changes.
- New calculations for manufacturer revisions or additions to the plans.
- Satisfaction of the 2019 CBC and new design criteria.

The calculations narrative shall be placed in front of the revised and added calculation.