
POLICY: COMMUNITY COLLEGE STUDENT HOUSING PROJECTS SUBMITTED TO DSA

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

DISCIPLINE(S)

Structural Safety, Fire and Life Safety, Accessibility.

PURPOSE

This policy document is provided to inform the decisions of community college districts (CCD) regarding student housing projects.

BACKGROUND

AB 358 (Chapter 83, Statutes of 2023) amended Education Code (EDC) 81050.5 which exempts student housing provided by a CCD from DSA plan approval and construction oversight required under EDC Article 7 and Article 8, commonly known as the Field Act, and access compliance plan approval requirements under Government Code (GOV) 4453. DSA authority for fire and life safety plan review and approval under GOV 14963 was not addressed in AB 358. Under the new law, the CCD can elect to submit to DSA for plan approval.

1. EARLY PROJECT PLANNING: SELECTION OF JURISDICTION

The selection of jurisdiction should occur early in project planning and be informed by this policy, project location, program, and design criteria.

1.1 The following CCD student housing projects are **not** exempt from DSA approval and construction oversight:

- Student housing projects that contain programmatic areas that will be utilized by the CCD for educational purposes.
- Student housing projects that contain shared spaces such as dining facilities or other support services that are offered to all students of the CCD.

1.2 The statutory requirements of the EDC only exempt the residential building from DSA review, approval, and construction oversight. Student housing projects co-located on a campus with other Field Act structures are required to submit site development work for the project, including utilities, to DSA for review, approval, and construction oversight if such work extends beyond five feet from the building footprint. DSA advises a pre-application meeting to confirm areas of the CCD student housing project for which DSA retains jurisdiction.

1.3 EDC 81160 specifies that any building that is not constructed in accordance with Article 7 and was not repaired, reconstructed, or replaced in accordance with Article 8 requires a public notice stating that the building does not meet the structural standards imposed by law for earthquake safety. For the protection of students and faculty on the campus, DSA will enforce this requirement, or a measure of equivalent means, for CCD student housing projects that do not meet Field Act requirements.

COMMUNITY COLLEGE STUDENT HOUSING PROJECTS SUBMITTED TO DSA

1.4 CCD projects under DSA jurisdiction are exempt from local requirements. CCD student housing projects submitted to the local jurisdiction for review, approval, and construction inspection may be subject to the following requirements:

- Local planning process
- Local impact fees
- Local building code amendments
- Local energy ordinances
- CALGreen residential mandatory measures
- Scheduling of inspections
- Issuance of a Certificate of Occupancy

2. CCD STUDENT HOUSING PROJECTS SUBMITTED TO DSA AFTER JANUARY 1, 2024

CCD student housing projects submitted to DSA for review will be reviewed for structural safety, fire and life safety, and access compliance requirements, except for projects submitted for access compliance only review as described in Section 3 of this document.

2.1 DSA approval and certification of a CCD student housing project confirms compliance with Field Act requirements, including but not limited to the enhanced structural safety requirements (DSA-SS CBC amendments), and continuous inspection during construction by a DSA-certified Project Inspector.

2.2 If a CCD student housing project submitted to DSA elects to conform to the alternate structural safety requirements (DSA-SS/CC CBC amendments) in accordance with EDC 81050.5, then DSA approval and certification will confirm compliance with the alternate requirements.

3. CCD STUDENT HOUSING PROJECTS SUBMITTED TO THE LOCAL JURISDICTION

CCD student housing projects submitted to the local jurisdiction will have all building disciplines within the footprint of the building reviewed by the local jurisdiction, including fire and life safety review.

3.1 CCD student housing projects that are not, or will not be in the future, co-located on a site with other Field Act structures will have site development work reviewed by the local jurisdiction.

3.2 CCD student housing projects must meet the California Building Code Chapter 11B accessibility requirements for *housing at a place of education* and *public housing*. Prior to AB 358, DSA had sole jurisdiction for access compliance for student housing projects at public educational institutions. To ensure access compliance, CCD student housing projects submitted to the local jurisdiction may also be submitted for concurrent access compliance-only plan approval by DSA.

3.2.1 Access compliance only projects shall be submitted to the DSA regional office in the region the project resides through the regular project submission process including payment of applicable fees.

3.2.2 Projects submitted for access compliance-only review by DSA are not eligible for certification.

3.2.3 DSA will not hold approval of the access compliance only project awaiting approval by the local jurisdiction, nor will DSA require the concurrence of the local jurisdiction.

3.2.4 DSA will not engage with the local jurisdiction to resolve issues of differing interpretation and such responsibility will remain with the architect of record.

COMMUNITY COLLEGE STUDENT HOUSING PROJECTS SUBMITTED TO DSA

ADDITIONAL RESOURCES:

Bill text: [AB 358: Community College Student Housing](#)

Access Compliance Resources:

[DSA Academy](#): Housing at a Place of Public Education.

This on-demand course is an overview of federal and state regulations, guidelines, and standards for housing at a place of education that is also public housing. Attendees will understand how to analyze and apply the CBC regulations for accessibility to projects that are newly constructed housing at a place of public education. The session will also compare the CBC to the ADA and FHA requirements for accessibility of housing at a place of public education. Lastly, attendees will understand how to analyze and apply the CBC regulations for accessibility to alterations and additions to housing at a place of public education, including path of travel improvements.

[DSA IR 11B-11: Bathrooms in Newly Constructed Housing Facilities for Undergraduate Students at a Public School, College or University](#)

Bathrooms in Newly Constructed Housing Facilities for Undergraduate Students at a Public School, College, or University.

[DSA Access Compliance Reference Materials](#)

Including the Access Compliance Advisory Manual and the Guide to Public Housing.

REFERENCES:

Education Code section 81050.5

Government Code section 4453

A DSA Policy is a formally established set of governing statements based on law and code objectives, addressing any aspect of DSA's review and approval of plans and specifications and construction oversight programs that is not clearly addressed by code. A Policy also may specify administrative or technical requirements that are not yet addressed within Title 24 but are deemed important and necessary to fulfill code objectives in advance of adoption into the code.