
PROJECT INSPECTION OF SCHOOL BUILDINGS OWNED BY A NON-SCHOOL ENTITY

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

PURPOSE

This Interpretation of Regulations (IR) provides clarification of specific code requirements relating to the inspection oversight responsibilities for project inspection of DSA approved school buildings in which the owner is a non-school entity. These are usually permanent modular or relocatable buildings owned by a leasing entity or owned and stockpiled by a building manufacturer that will be leased or sold to a school district. This IR is not applicable to buildings constructed under design-build and lease-leaseback delivery methods for which inspection requirements are detailed in *IR A-33: Design-Build and Lease-Leaseback Alternative Project Delivery Methods*.

BACKGROUND

A non-school entity project is defined to be a project approved for construction by DSA having one or multiple buildings constructed for future distribution to school sites in order to create an inventory of school buildings for ready use. A school district, which is not involved at the time of construction, may purchase or lease these buildings for expedited deployment onto its school campuses. The Field Act requires that construction/alteration of school buildings receive observation and inspection of the work by DSA-certified project inspectors. California Administrative Code (CAC) Section 4-333 requires that competent, adequate and continuous inspection be provided; however, an inspector shall not have any current employment relationship with any entity that is a contracting party for the construction.

INTERPRETATION

A non-school entity shall contract directly with an independent testing laboratory accepted by DSA through the Laboratory Evaluation and Acceptance program, for services of the engineering manager to provide oversight of the inspection of the building construction/alteration work. The laboratory engineering manager shall select and hire the project inspector and, if necessary, a special inspector, to provide competent, continuous construction inspection and material identification in accordance with CAC Section 4-333. An independent DSA-approved engineering manager, licensed in the State of California, is determined by DSA to provide adequate separation between the inspector and the construction contracting parties such that the project inspector is not considered to be hired directly by the non-school entity.

1. LABORATORY ENGINEERING MANAGER RESPONSIBILITIES

To satisfy the regulations that an inspector shall not be in the employ of the non-school entity, managing professional engineers of DSA-accepted laboratories may be contracted by the non-school entity. These managers act as an independent party hiring the project inspector for the construction/alteration of the building(s). The laboratory engineering manager shall oversee the inspection process to ensure adequate and competent inspection is provided for each building.

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2. OVERSIGHT OF PROJECT INSPECTION, MATERIAL TESTING AND/OR SPECIAL INSPECTION

The laboratory engineering manager shall perform the following duties:

- Those identified in *IR A-7: Inspector Certification and Approval* for design professionals, such as assessing the project inspector for knowledge, skills and abilities to perform the inspection of construction. Additionally, perform the required material identification, material sampling and/or special inspection.
- Review and complete Section 6 of the form *DSA 5-IPI: In-Plant Project Inspector Qualification and Approval* (or form *DSA 5-PI: Project Inspector Qualification and Approval* if applicable) for the project inspector and sign the form.
- Ensure the form *DSA 5-IPI* (or form *DSA 5-PI* if applicable) has been approved by DSA prior to start of construction.
- Observe the performance of the project inspector's work to the satisfaction of the laboratory engineering manager that the construction inspection of each building is in accordance with DSA-approved plans, and the material identification, material sampling and/or special inspection is being conducted in accordance with CAC Sections 4-333, 4-335, 4-336 and 4-214.
- Through cooperation with the project inspector, ensure the *form DSA 152-IPI: In-Plant Inspector Inspection Card/Verified Report* is submitted to DSAbox immediately upon completion of construction of each building.

3. MATERIAL IDENTIFICATION, MATERIAL SAMPLING AND/OR SPECIAL INSPECTION IF PERFORMED BY OTHER THAN PROJECT INSPECTOR

If the project inspector lacks the specific knowledge, skills, abilities or applicable material sampling/special inspector certificates (e.g., AWS-CWI) to perform the applicable sampling or inspections, the laboratory engineering manager shall ensure that the work is conducted by a DSA-accepted laboratory or special inspector. The laboratory engineering manager may hire another DSA-approved firm or special inspector to perform the services, or the laboratory engineering manager's firm may perform this work if contracted by the non-school entity. If any material tests are made, a form *DSA 291: Laboratory of Record Verified Report* shall be required to indicate such from the engineering manager of the contracted laboratory.

REFERENCES:

CAC, Sections 4-302 and 4-315

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.