

# GUIDE FOR CREATING PROPOSED BUILDING STANDARDS

For state agencies that develop building standards for submittal  
to CBSC for publication in Title 24, California Code of Regulations

September 2026 – 8<sup>th</sup> Edition



**C A L I F O R N I A**  
BUILDING STANDARDS COMMISSION

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Some of CBSC's publications available on the website's [Resources page](#):

Guide to Title 24

Public Guide to the Building

It's Your Building Department

Standards Adoption Process

Guide for Local Amendments of

Frequently Asked Questions

Building Standards

Glossary of Terms

# Contents

|                                                                      |          |
|----------------------------------------------------------------------|----------|
| <b>Introduction and Purpose.....</b>                                 | <b>1</b> |
| Application .....                                                    | 1        |
| State Laws and Regulations .....                                     | 2        |
| State Law.....                                                       | 2        |
| State Regulations .....                                              | 3        |
| Authority of the California Building Standards Commission.....       | 3        |
| State Adopting and Proposing Agencies .....                          | 3        |
| State Adopting Agency Hearing Date Approval .....                    | 4        |
| 18-Month Code Adoption Cycles .....                                  | 4        |
| Triennial Code Adoption Cycle.....                                   | 4        |
| Intervening Code Adoption Cycle.....                                 | 5        |
| Cycle Start Dates.....                                               | 5        |
| Emergencies and Other Rulemakings .....                              | 5        |
| Emergency Building Standards .....                                   | 5        |
| Model Code Emergency Amendments.....                                 | 5        |
| Change Without Regulatory Effect (CWoRE) .....                       | 6        |
| Resources and Training.....                                          | 6        |
| Office of Administrative Law (OAL) training .....                    | 6        |
| Accessibility training .....                                         | 6        |
| CBSC Training, Guidebooks and Videos .....                           | 6        |
| Training and information provided before a code adoption cycle ..... | 6        |
| Guidebooks (dgs.ca.gov/BSC/Resources).....                           | 7        |
| Videos (dgs.ca.gov/BSC/Education and Outreach) .....                 | 7        |
| CBSC's Code Adoption Cycle Timeline .....                            | 7        |
| CBSC's Rulemaking Process Flowchart: .....                           | 7        |
| Rulemaking Documents and Format .....                                | 8        |
| Forms, Templates and Checklists .....                                | 8        |
| Accessibility .....                                                  | 8        |
| Previous Rulemaking Examples.....                                    | 9        |
| Rulemaking Development (Pre-cycle) .....                             | 9        |
| Step One – Draft the Express Terms and Hold Workshops.....           | 10       |
| Step Two – Create the Initial Express Terms (IET).....               | 10       |
| Step Three – Create the Initial Statement of Reasons (ISOR) .....    | 10       |
| Step Four – Create the Notice of Proposed Action (NOPA) .....        | 11       |
| Step Five – Complete the Nine-point Criteria Analysis .....          | 11       |
| Step Six – Complete Required Forms.....                              | 11       |
| Step Seven– State Fire Marshal Approval .....                        | 11       |
| Initial Rulemaking File Submittal (Begin Code Adoption Cycle).....   | 12       |
| State Proposing Agencies .....                                       | 12       |
| Deliverables to CBSC.....                                            | 12       |
| State Adopting Agencies .....                                        | 12       |
| Code Advisory Committee Meetings.....                                | 13       |
| Agency Response Matrix .....                                         | 14       |

|                                                                       |    |
|-----------------------------------------------------------------------|----|
| Public Comment Rulemaking File Submittal (APA Portion of Cycle) ..... | 14 |
| Deliverables to CBSC .....                                            | 14 |
| State Adopting Agencies .....                                         | 15 |
| Initial Public Comment Period (45-day) .....                          | 15 |
| Commission Review Meeting .....                                       | 16 |
| Additional Public Comment Periods.....                                | 16 |
| Final Rulemaking File Submittal .....                                 | 16 |
| Deliverables to CBSC .....                                            | 17 |
| State Adopting Agencies .....                                         | 18 |
| Reminders .....                                                       | 18 |
| Public Meeting for Adoption/Approval.....                             | 18 |
| State Proposing Agencies .....                                        | 18 |
| State Adopting Agencies .....                                         | 19 |
| Codification and Publication Process.....                             | 19 |
| Codification .....                                                    | 19 |
| Forms of Publication .....                                            | 19 |
| Title 24 Publishers .....                                             | 20 |
| Appendices .....                                                      | 20 |

## Introduction and Purpose

The California Building Standards Commission (CBSC) is responsible for administering the rulemaking process which results in the publication of the California Building Standards Code, Title 24 of the California Code of Regulations (CCR), known as Title 24. CBSC has developed this guide to assist state agency representatives who are responsible for preparing rulemaking documents that contain proposed building standards for inclusion in Title 24.

Adherence to these guidelines, as well as the state laws and regulations referenced herein, will streamline the work that CBSC's staff must perform to prepare documents for posting on CBSC's website, review by Code Advisory Committees, consideration during public comment periods, presentation to the commissioners at public meetings for review and approval, and—finally—the publication process.

Before each code adoption cycle, CBSC provides the following information and guidance for state agency representatives who will participate in the rulemaking process:

- This detailed guide to the rulemaking process
- Recordings of previous rulemaking training sessions
  - 2023 Triennial Cycle training (8.5 hours)
  - 2022 Intervening Cycle training (3 hours)
- A video [About the CBSC Rulemaking Process](#)
- A *Glossary of Terms* and other educational documents available on our website's [Resources tab](#)
- A meeting with CBSC staff to go over vital information for the upcoming cycle, including any changes to the information provided in the video recordings.
- Staff available by phone or email to answer questions that arise during the rulemaking process at [cbssc@dgs.ca.gov](mailto:cbssc@dgs.ca.gov) or (916) 263-0916.

## Application

These guidelines apply to a state agency's development of a rulemaking file for proposed building standards, which includes the Notice of Proposed Action (NOPA), Express Terms (ET), Initial Statement of Reasons (ISOR), Final Statement of Reasons (FSOR), and other required rulemaking documents submitted to CBSC for public review, hearings, adoption, approval and publication in Title 24.

Building standards as defined in Health and Safety Code Section 18909 must be located in Title 24 and no other title of the CCR, unless specifically authorized by other state law.

The California Building Standards Code has 13 parts divided by subject matter:

- Part 1 California Administrative Code
- Part 2 California Building Code, Volumes 1 and 2, based on the International Building Code
- Part 2.5 California Residential Code, based on the International Residential Code
- Part 3 California Electrical Code, based on the National Electrical Code
- Part 4 California Mechanical Code, based on the Uniform Mechanical Code
- Part 5 California Plumbing Code, based on the Uniform Plumbing Code
- Part 6 California Energy Code
- Part 7 California Wildland-Urban Interface Code, based on the International Wildland-Urban Interface Code
- Part 8 California Historical Building Code
- Part 9 California Fire Code, based on the International Fire Code
- Part 10 California Existing Building Code, based on the International Existing Building Code
- Part 11 California Green Building Standards Code, also known as CALGreen
- Part 12 California Referenced Standards Code

## State Laws and Regulations

The following state laws and regulations relate to the rulemaking process and should be read and understood before beginning to create proposed building standards. See [Appendix A, Rulemaking References](#), for a list of state laws and regulations by rulemaking subject matter.

### State Law

**California Building Standards Law (CBSL)** is in the [California Health and Safety Code \(HSC\) Division 13, Part 2.5](#), commencing with Section 18901. This body of state law governs the activities of CBSC, state adopting and proposing agencies, and the rulemaking process. HSC Sections 18928 through 18938 establish requirements for the development and adoption of building standards under the review authority of CBSC. Several sections reference provisions of the Administrative Procedure Act (APA).

**Administrative Procedure Act (APA)** is in [Government Code \(GOV\) Division 3, Part 1, Chapter 3.5](#), commencing with Section 11340. Whenever the CBSL references provisions within the APA, such as HSC Sections 18930 and 18935, those referenced provisions apply to the building standards rulemaking process.

## State Regulations

CBSC has adopted regulations regarding rulemaking in the California Administrative Code, Part 1 of Title 24, Chapter 1, Article 4. These regulations include requirements for developing and submitting rulemaking documents to CBSC for public review and consideration by the commission.

State adopting and proposing agencies are subject to other state laws governing their activities, the rulemaking process and their authority (or specific legislative mandate) for developing building standards.

## Authority of the California Building Standards Commission

The authority and mandates for CBSC are found in California Building Standards Law. Any building standard developed by a state agency must be submitted to CBSC for adoption or approval and subsequent publication in Title 24 per HSC Section 18930(a) and GOV Section 11343(f). In carrying out its responsibilities, CBSC performs these functions and activities:

- Conducts meetings of the Coordinating Council established by HSC 18926 (see the [About tab](#) on CBSC's website for more information)
- Administers the rulemaking process for state proposing agencies
- Makes proposed building standards of state proposing agencies available to the public and encourages public participation
- Reviews and approves state adopting agencies' NOPAs, ISORs and their proposed hearing dates
- Conducts Code Advisory Committee meetings (see the [About tab](#) on CBSC's website for more information)
- Acts as a state proposing agency for limited occupancies and applications, such as non-residential green building standards
- Conducts public meetings to consider proposed or adopted building standards
- Takes action on proposed building standards: approve, disapprove, further study required, or approve as amended
- Coordinates the publication of approved and adopted building standards in Title 24 and makes the building standards available to the public

## State Adopting and Proposing Agencies

It is important to know the difference between state adopting and proposing agencies because they conduct their rulemaking process differently. In short, a **state proposing agency** submits proposed building standards to CBSC, which then administers the code adoption process. Examples of state proposing agencies include the Department of Housing and Community Development (HCD), the Division of the State Architect (DSA) and the Office of the State Fire Marshal (SFM).

A **state adopting agency** has authority to develop rulemaking files, as well as conduct its own public comment periods and hearings to adopt proposed building standards. In HSC Section 18935, CBSC is charged with reviewing and approving state adopting agencies' NOPAs and ISORs, approving their hearing dates, and submitting the NOPAs to the Office of Administrative Law (OAL) for inclusion in the California Regulatory Notice Register. After the rulemaking process is complete, adopted building standards must be submitted to CBSC for approval and publication in Title 24. *CBSC's authority to approve building standards adopted by state adopting agencies is limited to verifying that the process was carried out in compliance with the HSC and APA.* Examples of state adopting agencies include the California Energy Commission (CEC), the State Historical Building Safety Board (SHBSB) and the State Lands Commission (SLC).

References:

- California Administrative Code Section 1-103 (Definitions)
- GOV Sections 11346 through 11348
- HSC Section 18930(b)
- HSC Sections 18949.1 through 18949.7

## State Adopting Agency Hearing Date Approval

HSC Section 18935(b) and Section 1-405 of the California Administrative Code require a state adopting agency to obtain CBSC's advance written approval of the date, time and location for a public hearing regarding building standards. This requirement eliminates possible scheduling conflicts with other adopting and proposing agencies' public hearings or meetings, therefore assuring public participation.

## 18-Month Code Adoption Cycles

In accordance with HSC Section 18929.1, there are two regular code adoption cycles for adopting building standards—the triennial and intervening cycles—that occur at 18-month intervals.

**Triennial Code Adoption Cycle:** As the term implies, the triennial cycle occurs every three years. During this cycle, the latest editions of the model codes referenced in HSC Sections 17922, 18916, 18934.7, 18938 and 18938.3 are adopted. Model codes are published every three years by private code development organizations—the International Code Council (ICC), International Association of Plumbing and Mechanical Officials (IAPMO), and National Fire Protection Association (NFPA)—and are used as the basis for Parts 2, 2.5, 3, 4, 5, 7, 9 and 10 of Title 24. HSC Section 18942 requires CBSC to publish a new edition of Title 24 every three years.

HSC Section 18928(a) states that the most recent edition of a model code or national standard shall be adopted.

HSC Section 18928(b) requires state agencies to adopt or propose the adoption of the most recent editions of the model codes within one year of their publication. Should a state adopting agency fail to propose adoption, CBSC will adopt the model code(s) on behalf of the state agency as provided for in HSC 18928(c).

HSC Section 17922(b), within HSC Division 13, Part 1.5 (known as the State Housing Law), is applicable to residential occupancies and establishes that the most recent editions of the identified model codes will be effective within one year of their publication date even if the state agency fails to adopt the model codes via regulatory action.

**Intervening Code Adoption Cycle:** This cycle is required by HSC Sections 18929.1 and 18942 and occurs between triennial cycles to allow for the adoption of new building standards, and amendment or repeal of existing building standards in the current edition of Title 24. The amendments are published in the form of supplement pages (printed on blue paper) to add new pages or replace existing pages of Title 24.

**Cycle Start Dates:** CBSC issues a written announcement addressed to the director, chief, or other appropriate managing position of each state adopting and proposing agency at least 180 days before a triennial or intervening code adoption cycle. The written announcement is a requirement of California Administrative Code Section 1-406, and it establishes the date by which CBSC will accept proposed amendments to building standards for the upcoming cycle. The announcement is also provided to the designated state agency representatives of CBSC's Coordinating Council.

## Emergencies and Other Rulemakings

**Emergency Building Standards:** Emergency building standards may be proposed at any time. There are specific requirements for proposed emergency building standards in addition to those for a regular rulemaking. An agency contemplating emergency building standards shall communicate with CBSC before commencing with the emergency rulemaking (HSC Section 18926(b)(2)). Additionally, GOV Section 11346.1(b) provides strict conditions and procedures for emergency adoptions.

Additional References:

- HSC Sections 18913, 18937, 18938 and 18942
- GOV Sections 11346.1 and 11349.6 within the APA, with references to other provisions of the APA
- California Administrative Code Section 1-419

**Model Code Emergency Amendments:** When a private code organization adopts an emergency amendment to a model code that is currently adopted by CBSC, that amendment has no effect until adopted by CBSC. HSC Section 18934.8 authorizes CBSC to conduct an emergency rulemaking to adopt the emergency model code amendment. This rulemaking may be separate from a triennial or intervening code adoption cycle with timeframes that are substantially different than other rulemakings.

**Change Without Regulatory Effect (CWoRE):** California Administrative Code Section 1-421 was adopted by CBSC to allow the commission and the state adopting and proposing agencies to make editorial corrections and revisions to current provisions of Title 24 without a full public comment period and complete rulemaking file. A CWoRE may be undertaken at any time and does not need to coincide with a triennial or intervening code adoption cycle.

The type of regulatory change allowed under this section is limited to editorial corrections and amendments that do not create new requirements for the public. See California Administrative Code Section 1-421(c) for a list of allowed CWoRE actions.

## Resources and Training

Although CBSC staff are available to assist with an agency's rulemaking activities, it is highly recommended that agency staff prepare for an upcoming code adoption cycle by utilizing available resources and training:

**Office of Administrative Law (OAL) training:** Most titles of the California Code of Regulations are subject to the requirements and approval of OAL. However, building standards for publication in Title 24 are subject to oversight and approval by CBSC. OAL provides educational information and documents regarding the rulemaking process on its [training website](https://oal.ca.gov/training): [oal.ca.gov/training](https://oal.ca.gov/training). Specifically, the three-day rulemaking training course for state agency personnel is beneficial for those new to the rulemaking process.

**Accessibility training:** Rulemaking documents submitted to CBSC that are not accessible for people with disabilities will be returned to the submitting agency for remediation. State agency staff who are not familiar with creating accessible documents should seek out training provided by the state (e.g., [California Department of Rehabilitation](https://dor.ca.gov/Home/DasTrainings): [dor.ca.gov/Home/DasTrainings](https://dor.ca.gov/Home/DasTrainings)) or other institutions. Document accessibility is briefly discussed in the CBSC rulemaking training recordings, but this should not be considered a substitute for professional instruction.

## CBSC Training, Guidebooks and Videos

### Training and information provided before a code adoption cycle

- **Rulemaking training:** Agency personnel can view rulemaking training recordings specific to the building standards adoption process for Title 24. Links are provided in the "Videos" section below.
- **Rulemaking information session:** CBSC hosts a meeting to share vital information about the upcoming cycle and lessons learned from past cycles. Agencies are asked to submit specific questions prior to the meeting for CBSC staff to provide a relevant and impactful presentation. There will also be an opportunity to discuss questions during the meeting.

## Guidebooks ([dgs.ca.gov/BSC/Resources](https://dgs.ca.gov/BSC/Resources))

- **Guide to Title 24:** Provides detailed information about Title 24, including how to use the code and apply it to different building occupancies, state and local code adoption, enforcement by local jurisdictions, and the code's production and maintenance. This is an excellent reference document for people not already familiar with Title 24.
- **A Public Guide to the Building Standards Adoption Process:** Created for the general public to explain the process by which building standards are developed and adopted.
- **Glossary of Terms:** Definitions and explanations of the many names, terms and phrases related to creating, adopting and publishing building standards.
- **Frequently Asked Questions:** Provides answers to, and explanations of, frequently asked questions about Title 24, rulemaking, and matters related to the development and use of Title 24.

## Videos ([dgs.ca.gov/BSC/Education and Outreach](https://dgs.ca.gov/BSC/Education and Outreach))

- [About The California Building Standards Commission](#): Explains the makeup of the commission, its staff, purpose and duties.
- [About Title 24](#): Covers the parts of Title 24 and the state agencies that have authority to amend the regulations for different occupancies.
- [About the CBSC Rulemaking Process](#): Provides an overview of the rulemaking process.
- [2022 Rulemaking Training for State Agencies](#) (approximately three hours) and [2023 Rulemaking Training for State Agencies](#) (approximately eight and a half hours): Recordings of two different rulemaking training classes presented by CBSC for the 2022 intervening and the 2024 triennial code adoption cycles. These recordings include some basic document accessibility information.

**CBSC's Code Adoption Cycle Timeline:** Once a code adoption cycle has been planned by CBSC, a timeline identifying the cycle events is made available on CBSC's website under the [Rulemaking tab](#). The timeline shows critical timeframes for planned Code Advisory Committee (CAC) meetings, public comment periods, CBSC public meetings, and publication and effective dates. [See Appendix B](#).

**CBSC's Rulemaking Process Flowchart:** A graphic depiction of the rulemaking process that is repeated for both triennial and intervening code adoption cycles. See [Appendix D](#) (also available on CBSC's Resources page under "Guidebooks on Rulemaking").

## Rulemaking Documents and Format

For each new rulemaking cycle, agency representatives must use the current forms, templates and checklists provided by CBSC. *Do not reuse any documents saved from previous rulemaking cycles.* CBSC rulemaking forms, templates and checklists are updated regularly to include any new mandated requirements and are formatted to meet the accessibility requirements detailed below.

### Forms, Templates and Checklists

**Forms:** These forms will be provided by CBSC and are required when developing a rulemaking file:

**Building Standards Notice/Submission Face Sheet (Form BSC-1):** Must accompany a submitted rulemaking file and is provided to OAL with the Notice of Proposed Action, and later to the Secretary of State after adoption or approval of building standards.

**Economic and Fiscal Impact Statement (Form 399):** Also available from the California State Forms Directory, Department of Finance (DOF) and OAL. There are references to the State Administrative Manual (SAM) and state laws that must be consulted. The completed form must include the physical or electronic signatures of the department/agency's fiscal officer, the agency's secretary, and, under certain circumstances, DOF. There is more information about this form later in this guidebook.

**Templates:** State agencies must use the templates provided by CBSC to comply with the content and accessibility requirements for each step of the rulemaking process—initial submittal, public comment period(s), final submittal, emergency rulemaking and CWoREs. Using current templates ensures that rulemaking documents follow a consistent format and are acceptable to CBSC. When filling in templates, only add text in the available fields. *Do not overwrite template text and headings that have been formatted to meet accessibility standards.* See [Appendix E](#) for a quick reference of rulemaking dos and don'ts.

**Checklists:** Checklists are used by CBSC staff to review received rulemaking files to determine compliance with the APA and Chapter 1, Article 4 of the California Administrative Code. A proposing agency may use the checklists to verify that all requirements are satisfied before submitting a rulemaking file to CBSC. There is no requirement to include a copy of the checklists with a rulemaking file. The checklists are provided to assist with the development and final assembly of an agency's submittal.

**Accessibility:** All rulemaking documents submitted for posting on CBSC's website shall comply with the Web Content Accessibility Guidelines 2.0, or a subsequent version, published by the Web Accessibility Initiative of the World Wide Web Consortium at a minimum Level AA success criterion. See GOV Section 11546.7(a) and California Administrative Code, Chapter 1, Article 4, Sections 1-407, 1-411 and 1-415. Documents that do not meet the requirements will be returned to the agency for remediation, as CBSC staff are not able to remediate other agencies' rulemaking documents.

**Previous Rulemaking Examples:** CBSC’s website hosts rulemaking documents that were developed by the various state agencies for previous code adoption cycles, emergency rulemakings and CWoREs. The documents may be used for reference only. *Do not use previously submitted rulemaking documents as templates.* Using an expired template will result in a document being returned to the submitting agency.

Should any CBSC templates, checklists or forms conflict with the requirements of laws or regulations referenced herein or otherwise applicable to the adoption of building standards, the laws or regulations shall prevail. Please report such conflicts to CBSC at 916-263-0916 or [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov).

## Rulemaking Development (Pre-cycle)

To propose building standards for inclusion in Title 24, follow the steps provided in this section and be sure to read and follow all cited references.

This first phase of rulemaking is referred to as “Pre-cycle.” Pre-cycle public participation is mandated by HSC Sections 18929.1 and 18934; the requirements are detailed in California Administrative Code Section 1-403.

In 2025, Budget Trailer Bill AB 130 (Chapter 22, Statutes of 2025, Sections 29-31 and 37-42) was passed and became effective June 30, 2025. AB 130 added subdivision (g) to HSC Section 18930 enacting a moratorium on state and local building standards affecting residential units beginning October 1, 2025, and ending June 1, 2031, with the following exceptions:

- Emergency building standards.
- Amendments by the State Fire Marshal within the California Wildland-Urban Interface Code (Part 7 of Title 24).
- Amendments related to single-exit, single stairway apartments.
- Amendments related to adaptive reuse, water reuse, and onsite treated water systems.
- Adoption of model codes, with necessary amendments.
- Adoption of errata or emergency updates to the model codes with necessary amendments.
- Accessibility standards to align with minimum federal accessibility laws, standards, and regulations.

In addition to the restrictions on residential building standard proposals listed above, AB 130 made changes to HSC Section 18942 that limit the types of code amendments that can be made during an intervening cycle to:

- Technical updates to existing code requirements that do not materially alter the substance or intent of the provisions.
- Emergency building standards.
- Amendments by the State Fire Marshal within the California Wildland-Urban Interface Code (Part 7 of Title 24).
- Building standards necessary to incorporate errata or emergency updates to the model codes, along with any necessary and related state amendments.

- Building standards necessary to incorporate updates to requirements that align with minimum federal accessibility laws, standards, and regulations.
- Changes or modifications made to building codes relating to hospitals, skilled nursing facilities, clinics, and other health facilities promulgated by the Office of Statewide Hospital Planning and Development.

These limitations are permanent and will affect all future intervening cycle proposals.

State agencies preparing to propose new or amended regulations for Title 24 must ensure they meet at least one of the exceptions in HSC Sections 18930 or 18942, depending on whether it is a triennial or intervening cycle. CBSC staff will review submittals and work with agency representatives to ensure compliance with AB 130. Proposals that do not meet the requirements of AB 130 may be rejected.

### Step One – Draft the Express Terms and Hold Workshops

**Draft Express Terms:** The Express Terms are the actual code language that will eventually be printed in Title 24 (if adopted and approved). When first drafting code language for review and input, the use of CBSC rulemaking templates is not required as *draft* express terms are not formally submitted to CBSC. Review GOV Section 11346.2, which explains basic requirements for drafting express term language, including using plain, straightforward language, as well as text styles such as underline, strikeout or italics.

**Hold Workshops:** Workshops are the first opportunity for public review of the draft code language. Be sure to maintain a record of all meetings with the public, regulated industries, associations and/or governmental agencies where the development of proposed building standards is discussed. Keep rosters of attendees, agendas, and recordings or written records of the discussions and any conclusions. The record of public participation should be referenced in the Initial Statement of Reasons and made available upon request.

Reference:

- GOV Section 11346.45 requires public participation prior to publication of the notice by OAL when the proposed regulations involve complex proposals or a large number of proposals.

### Step Two – Create the Initial Express Terms (IET)

Using input from discussions with interested parties during the workshop(s), develop the IET for submittal to CBSC and SFM (see Step Seven). Use CBSC's Express Terms template and follow the appropriate legend.

### Step Three – Create the Initial Statement of Reasons (ISOR)

Per GOV Section 11346.2(b), this document must provide the public and commissioners with a thorough rationale for each proposed amendment, deletion or addition within the Express Terms. The ISOR must explain the purpose of and necessity for the change and why it should be approved, including a problem that the change is meant to solve and benefits the change would provide. Any factual materials relied upon when developing the proposal should also be identified.

Additionally, Assembly Bill 2044 (AB 2044, Chapter 136, Statutes of 2026) prohibits CBSC from approving or adopting any proposed building standard unless the submitting agency provides a fully completed cost-of-compliance estimate in the ISOR, including potential benefits and the assumptions underlying those estimates. Agencies must ensure their ISOR complies with AB 2044 to avoid having the proposal rejected.

#### **Step Four – Create the Notice of Proposed Action (NOPA)**

This document includes a variety of information including findings, determinations, statutory authority, laws being implemented and procedural information. For state proposing agencies, information about the public comment period or meeting may be left blank for the initial submittal. The information will be added to the NOPA by CBSC once the public comment period or meeting dates are determined.

State adopting agencies shall include the public comment period or meeting information in the NOPA before submitting it to CBSC for filing with OAL and approval of the hearing date, time, and location.

References:

- GOV Section 11346.5
- HSC Section 18935
- California Administrative Code Section 1-405

#### **Step Five – Complete the Nine-point Criteria Analysis**

This template lists the criteria in HSC Section 18930(s) necessary for a building standard to be approved by the commission. Each criteria must have a justification.

#### **Step Six – Complete Required Forms**

1. **Building Standards Notice/Submission Face Sheet (Form BSC-1).** This form must accompany an initial rulemaking file submitted to CBSC.
2. **Economic and Fiscal Impact Statement (Form 399).** For the initial rulemaking submittal pursuant to California Administrative Code Section 1-407, Form 399 does not need to have the required signatures. CBSC staff will compare information provided in the form with information provided in the NOPA and ISOR to make sure it is consistent. A *signed* Form 399 must be submitted later in the code adoption cycle and is required for approval of proposed building standards at a CBSC public meeting.

#### **Step Seven– State Fire Marshal Approval**

Submit a copy of the IET to the State Fire Marshal and request a letter for the rulemaking file stating either:

1. The State Fire Marshal reviewed the proposed building standard(s) and found no fire and panic safety related requirements, or

2. The State Fire Marshal reviewed the proposed building standard(s) and approves of provisions relating to fire and panic safety.

References:

- HSC Section 18930(a)(9)

**Note:** While the approval letter from the State Fire Marshal is only required for inclusion with the final rulemaking file submittal, submit the request early to avoid processing delays.

## Initial Rulemaking File Submittal (Begin Code Adoption Cycle)

**State Proposing Agencies.** Submit the initial rulemaking file to CBSC as required by California Administrative Code Section 1-407. Use the Notice Review Checklist (BSC CL-9) as a reference. This checklist is used by CBSC staff to determine if the received rulemaking file is complete and ready to advance in the process. A proposing agency may also utilize this checklist to ensure file completion during development. [Appendix C](#), Deliverable Documents During the Rulemaking Process, also identifies the required documents at different stages of the rulemaking process.

### Deliverables to CBSC

Per California Administrative Code Section 1-407(b), the initial rulemaking file submitted to CBSC shall include the following:

- Face Sheet (BSC-1) with appropriate signature and a check in the “Notice of Proposed Action” box
- Notice of Proposed Action (NOPA)
- Initial Express Terms (IET)
- Initial Statement of Reasons (ISOR)
- Economic and Fiscal Impact Statement (Form 399)
- Nine-Point Criteria Analysis with a statement about pending review by the State Fire Marshal for determination whether the proposed building standards promote fire and panic safety
- One electronic file copy of each document submitted, suitable for immediate placement on CBSC’s website

**Note:** Final versions of the deliverables must be provided to CBSC as hard copies and on a compact disk or thumb/flash drive as Word and/or PDF files meeting California’s accessibility standards (GOV Sections 7405, 11135 and 11546.7). Documents that are not posted on CBSC website are not required to meet accessibility standards. [Appendix C](#) identifies documents required to be posted.

**State Adopting Agencies** do not need to submit any “initial” documents unless they want to participate in Code Advisory Committee review. See [Public Comment Rulemaking File Submittal](#) below.



## Code Advisory Committee Meetings

Code Advisory Committees (CAC) provide expert technical review of proposed building standards and give specific recommendations to CBSC and state proposing agencies. These recommendations are defined in the California Administrative Code, Section 1-409, as approve, disapprove, further study required or approve as amended. CACs review submittals of all state proposing agencies. Some state adopting agencies may also choose to submit their proposed building standards to a CAC for review. If this occurs, CACs are not required to give official recommendations, and adopting agencies are not required to address CAC recommendations, if any. For a list of committees and the appointed members, visit CBSC's [About Us](#) webpage.

CBSC schedules CAC meetings and prepares the rulemaking documents for CAC review and posting to CBSC's rulemaking website. Pursuant to California Administrative Code Section 1-409, the appropriate representative(s) from each proposing agency shall attend the CAC meeting to present the proposed building standards and address comments and questions from CAC members and the public.

Following the CAC meetings, each state proposing agency must consider all CAC comments and recommendations, then address each recommendation in a revised ISOR pursuant to California Administrative Code Section 1-409(h). CAC comments and recommendations are not binding; if a state agency disagrees with a CAC recommendation, the revised ISOR must explain why it was not accepted. If the IET document is amended to address accepted CAC comments, the amendments must be explained in the revised ISOR. The table below outlines possible agency actions and responses to CAC recommendations.

## Agency Response Matrix

| CAC Action         | Agency Action                                                                                                                                                 | Agency Response | ISOR Explanation                                    |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------|
| Approve            | No changes to the ET                                                                                                                                          | Accept          | None                                                |
|                    | Changes to the ET                                                                                                                                             | Disagree        | What changes have been made and why                 |
|                    | Withdraw the Item                                                                                                                                             | Withdraw        | Not required, but encouraged                        |
| Disapprove         | Keep the item in the ET with or without CAC suggestions                                                                                                       | Disagree        | Provide strong argument for disagreement or changes |
|                    | Remove the item from ET                                                                                                                                       | Withdraw        | None                                                |
| Approve as Amended | Change the ET per CAC recommendations                                                                                                                         | Accept          | Provide overview of what changes have been made     |
|                    | No changes to the ET or changes that differ from CAC recommendation                                                                                           | Disagree        | Provide strong argument for disagreement or changes |
|                    | Withdraw the item<br>The whole item must be withdrawn; partial withdrawal such as part of a definition or only some language from an amendment cannot be done | Withdraw        | Not required, but encouraged                        |
| Further Study      | Changes to the ET per CAC recommendations                                                                                                                     | Accept          | What changes have been made and why                 |
|                    | No changes to the ET or changes that differ from CAC recommendation                                                                                           | Disagree        | Provide strong argument for disagreement or changes |
|                    | Withdraw the item                                                                                                                                             | Withdraw        | Not required, but encouraged                        |

Revised rulemaking documents are to be submitted to CBSC within the 45-day public comment period file package. CBSC staff will establish a submittal due date to provide time for analysis and document remediation by the submitting agency, if necessary.

## Public Comment Rulemaking File Submittal (APA Portion of Cycle)

The APA portion of a rulemaking cycle includes the formal public notice, public comment period, and review phase required under California's Administrative Procedure Act (APA).

After the CAC meetings and prior to the initial 45-day public comment period, each state proposing agency must submit its revised rulemaking files to CBSC on or before the established deadline. See California Administrative Code Section 1-411.

## Deliverables to CBSC

Per California Administrative Code Section 1-411(c), the public comment rulemaking file (also known as the 45-day submittal) provided to CBSC shall include the following:

- Notice of Proposed Action (NOPA)
- 45-day Express Terms (ET) revised to incorporate any amendments resulting from CAC recommendations

- Initial Statement of Reasons (ISOR) updated to document all CAC recommendations and agency responses including explanations of any revisions to address the recommendations
- Economic and Fiscal Impact Statement (Form 399) approved and signed by the agency fiscal officer and the agency secretary (or highest-ranking official in the agency, if no secretary). Signatures are required before submittal to OAL for publication in the California Regulatory Notice Register (see SAM Section 6614).
- All other items required by California Administrative Code Section 1-407 if they were amended after the initial rulemaking file submittal
- One electronic file copy of each document submitted, suitable for immediate placement on CBSC's website

**Note:** Final versions of the deliverables must be provided to CBSC as hard copies and on a CD or thumb/flash drive as Word and/or PDF files meeting California's accessibility standards (GOV Sections 7405, 11135 and 11546.7). Documents that are not posted on CBSC's website are not required to meet accessibility standards. [Appendix C](#) identifies documents required to be posted.

**State Adopting Agencies.** While state adopting agencies administer their own public comment periods, HSC Section 18935 charges CBSC with reviewing and approving state agencies' hearing dates, NOPAs and ISORs, and submitting the NOPAs to OAL for inclusion in the California Regulatory Notice Register. Also see California Administrative Code Sections 1-405 and 1-420.

### **Initial Public Comment Period (45-day)**

As required by GOV Section 11346.4, proposed building standards must be made available to the public for a minimum of 45 days prior to adoption. CBSC is responsible for scheduling the 45-day public comment period for submittals from state proposing agencies. CBSC posts the downloadable rulemaking documents on its website and sends an email blast to registered interested parties. Hard copies may need to be provided by the submitting agency upon request.

State proposing agencies must also make rulemaking documents available on their website before the start of the public comment period. CBSC is responsible for collecting the public comments and distributing them to the appropriate state agencies. Proposing state agencies are also responsible for sending public comments they receive to CBSC to ensure all public comments are listed on CBSC's website. As a courtesy, CBSC posts public comments that are submitted in an accessible format on its rulemaking web page. Public comments that are not in an accessible format are listed on the website and may be requested from CBSC.

Any public comments received during a 45-day comment period must be considered and responded to in the Final Statement of Reasons (FSOR) as required by GOV Section 11346.9.

## Commission Review Meeting

A commission meeting is held after the public comment phase to review the 45-day submittal documents and any public comments received. This meeting provides an opportunity for commissioners to hear state agency proposals and provide input and feedback while there is still an opportunity for adjustments to be made.

## Additional Public Comment Periods

After consideration of public comments received during the initial 45-day public comment period and the commission review meeting, the state agency may amend its proposed building standard based on comments received or their own evaluation. If an amendment is non-substantial or solely grammatical in nature, no additional public comment period is required. Further requirements of GOV Section 11346.8(c) are:

- If an amendment is substantial and sufficiently related to the original text provided to the public, the amended language shall be made available to the public for at least 15 days.
- If the amendment is substantial and not sufficiently related to the original text, the amended language must be made available to the public for no less than 45 days.

Agencies shall use the “Additional 15- or 45-day Express Terms and Rationale” template (BSC TP-104). The template legend outlines how changes to the original proposal are to be shown: double underline for new text; ~~double-strikeout~~ for deleted text. ONLY changes to the original proposal should be shown in the new ET, along with any existing language necessary for clarity. The template also contains fields to provide the rationale for each item, so a separate Statement of Reasons is not needed.

Note: If an additional 45-day public comment period is required, another 45-day notice must be published in the California Regulatory Notice Register.

Any public comments received regarding the change(s) presented in an additional 15- or 45-day comment period must be responded to in the Final Statement of Reasons (FSOR) as required by GOV Section 11346.8.

## Final Rulemaking File Submittal

After the public comment period(s) and commission review meeting, state agencies must update the Express Terms to reflect the final proposed language, including any additional 15- or 45-day changes.

All deliverable rulemaking documents must be provided to CBSC by the established due date to allow time to prepare for the commission meeting to consider approval of the proposed building standards. Refer to California Administrative Code Section 1-415 for the complete list of all documents required and use CBSC’s Final Rulemaking File Review Checklist (BSC CL-3).

## Deliverables to CBSC

The documents below are numbered to match the complete list provided in Section 1-415. Some documents, such as those required for an emergency rulemaking, are not shown below.

1. Face Sheet with appropriate signature and a check in the “Regular Rulemaking” box
2. Notice of Proposed Action (NOPA) that includes the Informative Digest
3. Initial Statement of Reasons (ISOR)
4. Final Express Terms (FET)
6. Form 399 (Economic and Fiscal Impact Statement) with appropriate signatures and fiscal analysis prepared by the submitting agency
7. Written transcript, recording or minutes of any public hearing conducted as part of the APA portion of the cycle, if applicable
8. A copy of each exhibit submitted or written comment received at any public hearing conducted by the agency as part of the APA portion of the cycle, and transcript of oral comments received, if applicable
9. A copy of each written comment received during public comment period(s), if applicable
10. Final Statement of Reasons (FSOR) and any studies, surveys or documents used to support the rationale for the proposed building standards
11. Statement of Additional Documents Relied Upon and added to the rulemaking file after NOPA was published by OAL, if applicable. See GOV Section 11347.1.
12. Updated Informative Digest (UID)
13. Additional 15- or 45-day Express Terms and Rationale, and a memo attesting to the additional public comment availability period(s), if applicable
14. Certification of Close and Complete of the Rulemaking File, which includes Index or Table of Contents of each item in the submittal, with appropriate signature
15. Nine-Point Criteria Analysis with the letter from SFM required by HSC 18930(a)(9)
17. 45-Day Statement of Mailing Notice which shall include the date (at least 45 days before close of the public comment period) when the notice was mailed and posted on the website.
18. One electronic file copy of each document submitted, suitable for immediate placement on CBSC’s website

**Note:** Final versions of the deliverables must be provided to CBSC as hard copies and on a compact disk or thumb/flash drive as Word and/or PDF files meeting California’s accessibility standards (GOV Sections 7405, 11135 and 11546.7). Documents that are not posted on CBSC’s website are not required to meet accessibility standards.

[Appendix C](#) identifies documents required to be posted.

CBSC will use the state agencies' final submittal documents to prepare rulemaking files for the commissioners to review and consider the proposed building standards for adoption at a CBSC public meeting. Each state proposing agency is responsible for ensuring the completeness of its rulemaking file(s) as required per GOV Section 11347.3.

### State Adopting Agencies

Once building standards have been adopted, submit the entire rulemaking file to CBSC per California Administrative Code Section 1-420(c). The adoption will be placed on the agenda for the next CBSC public meeting to be considered for approval as having met the rulemaking requirements of the HSC, APA and the California Administrative Code.

### Reminders

- Ensure all authority and reference citations are complete and accurate within the Express Terms and NOPA, and are relevant to each specific item. Copying and pasting the same authority and reference citations for all proposed amendments on the Express Terms may result in rejection. For example, an authority and reference citation that is relevant to fire and life safety shall not be used as an authority and reference for graywater.
- Update the footer information on all templates as appropriate for each submittal phase of the cycle.
- Assemble submittal files in an orderly manner. An orderly file will reduce the potential for errors during the process of preparing for Code Advisory Committee review, public comment periods, CBSC's public meetings and subsequent filing of adopted building standards with the Secretary of State.
- See [Appendix E](#) for other rulemaking dos and don'ts.

### Public Meeting for Adoption/Approval

**State Proposing Agencies:** At CBSC's public meetings where adoption of proposals will be considered, each state proposing agency will be called to present its proposed building standards to CBSC's commissioners. State agency staff shall provide an overview of the agency's work relating to the proposed building standards, including workshops, legislative mandates, and/or the problem(s) being addressed by the proposed building standard(s). Agency staff should be prepared to respond to questions from CBSC's commissioners about CAC recommendations and public comments. The commissioners will need assurance that all public input has been considered. At the conclusion of the presentation, the representative should request that the commissioners approve the proposal(s). Additionally, CBSC's chairperson will call for public comment which may also need to be addressed by the agency representative(s).

**State Adopting Agencies:** CBSC's authority in California Building Standards Law (HSC, Division 13, Part 2.5) is limited to verifying compliance with the rulemaking process. The adopting agency representative's presentation should include a description of the steps taken to comply with rulemaking requirements in the HSC and APA, hearings conducted, and the attention given to public comments.

## Codification and Publication Process

Following CBSC adoption and approval of new, amended or repealed building standards, the changes must be published within the appropriate parts of Title 24. This action is called codification.

**Codification:** For each part of Title 24, CBSC staff creates a document called "Publisher Express Terms" where approved amendments from all of the proposing and adopting agencies are combined to be sent to the publisher. At the publisher, editors and typesetters place the codified text into the appropriate part of Title 24, and provide proofs to CBSC for review by the contributing state agencies.

When CBSC receives the proofs, adopting and proposing agency staff representatives are notified and provided with a schedule for review completion. Agencies must act promptly to complete the review of each proof in order to meet publishing deadlines.

After agency review is complete, CBSC reviews and combines comments from all the agencies. The proofs are then consolidated into a single document and returned to the publishers to be published and made available for purchase.

## Forms of Publication

**New edition:** A triennial code adoption cycle results in the publication of a new edition of Title 24 and includes the adoption of new editions of model codes with necessary California amendments in Parts 2, 2.5, 3, 4, 5, 7, 9 and 10, and amendments to the California-only regulations in Parts 1, 6, 8, 11 and 12. The code pages are printed on white paper.

**Supplements to current edition:** When the current edition of Title 24 is amended, a supplement is published. Supplements are printed on blue paper for insertion into the current edition of Title 24 and may occur for any of the following:

- When new building standards are added.
- When current building standards are amended by an intervening code adoption cycle action or an emergency adoption.
- When provisions in the current edition of Title 24 are repealed, the page or pages containing the repealed building standards, and possibly the adjacent pages impacted by the repeal, must be re-published in order to remove the repealed language and maintain the continuity of the remaining building standards.

**Change Without Regulatory Effect:** Also printed on blue paper, a change without regulatory effect (CWoRE) is a change to the provisions of Title 24 that does not impose any new requirements for the design or construction of buildings and associated structures and equipment (California Administrative Code Section 1-421(c)). CWoREs can include the repeal of building standards due to the repeal of statutory authority, or because of a legal judgement, or occur to revise the code's structure, cross-references, or authority and reference citations.

**Errata to current editions:** When the current edition of Title 24 is amended by the correction of a non-substantive printing error or omission, an erratum is published and printed on buff-colored paper for inclusion in Title 24.

**Electronic versions of the codes:** The publishers (below) have different methods for updating their electronic versions of Title 24. Basically, owners are notified of the publication of code updates, and are advised how to access new editions, supplements, CWoREs and errata. The words "SUPPLEMENT/CWoRE—BLUE" or "ERRATA—BUFF" are shown at the bottom of the replacement pages for an electronic code user's reference.

### **Title 24 Publishers**

[International Code Council \(ICC\)](#) – Parts 2, 2.5, 7, 9 and 10 (based on model codes with California amendments) and Parts 1, 6, 8, 11 and 12 (California codes)

[National Fire Protection Association \(NFPA\)](#) – Part 3 (based on model code with California amendments)

[International Association of Plumbing and Mechanical Officials \(IAPMO\)](#) – Parts 4 and 5 (based on model codes with California amendments)

## **Appendices**

**Appendix A.** Rulemaking References (RD-5)

**Appendix B.** California Building Standards Code Adoption Cycle Timeline (Rev. 9/26)

**Appendix C.** Deliverable Documents During the Rulemaking Process (RD-21, Rev. 09/26)

**Appendix D.** Rulemaking Process Flow Chart (RD-15, Rev. 06/26)

**Appendix E.** Rulemaking document "Dos and Don'ts" cheat sheet (RD-31, Rev. 09/26)

## Rulemaking Code Section References Within This Guide:

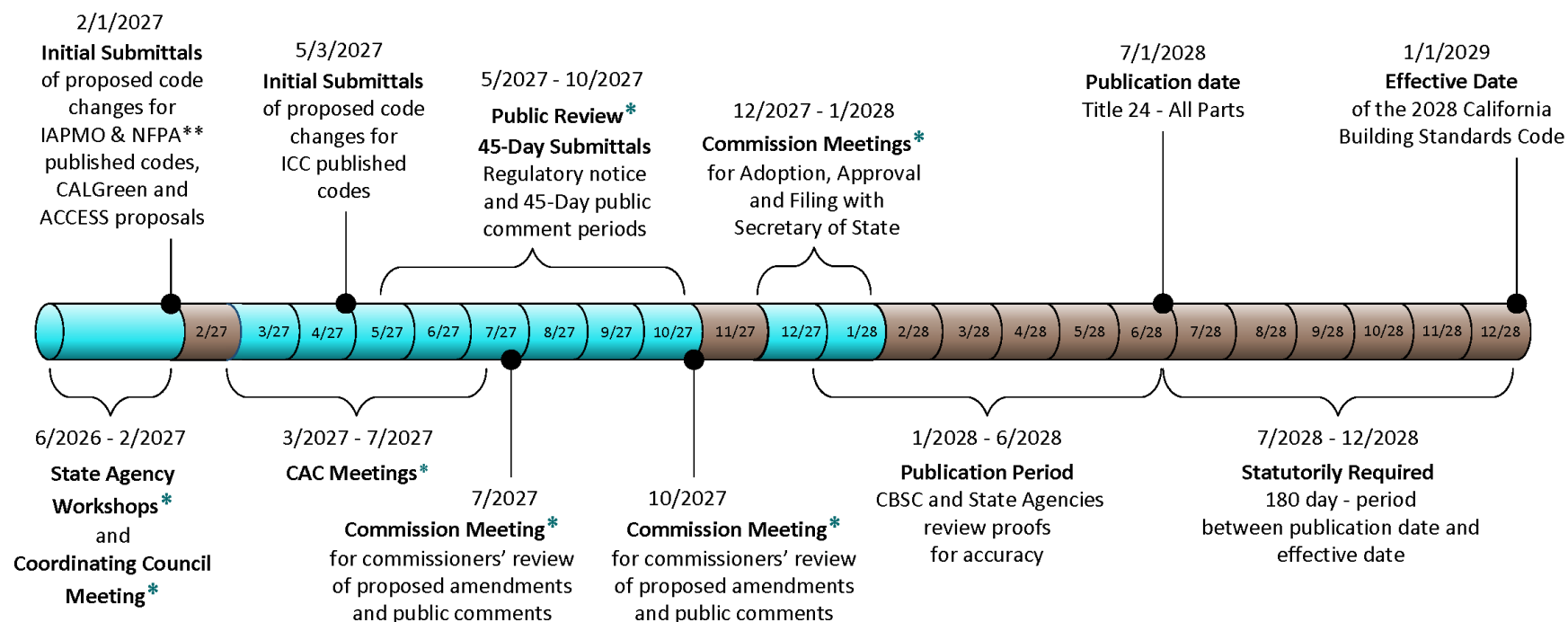
| Subject                                                               | <a href="#">Government Code</a> | <a href="#">Health &amp; Safety Code</a>                                                                  | <a href="#">California Administrative Code, Part 1, Title 24</a> |
|-----------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| Notice of Proposed Action (NOPA)                                      | 11346.4, 11346.5                | 18935, 18936                                                                                              | 1-407, 1-411, 1-415                                              |
| Express Terms (ET)                                                    | 11346.2, 18943.8(c)             |                                                                                                           | 1-407, 1-411, 1-415                                              |
| Initial Statement of Reasons (ISOR)                                   | 11346.2                         |                                                                                                           | 1-407, 1-411, 1-415                                              |
| Final Statement of Reasons (FSOR)                                     | 11346.9, 11347.1                |                                                                                                           | 1-415                                                            |
| Economic & Fiscal Impact (399)                                        | 11346.3, 11346.5                |                                                                                                           | 1-407, 1-415                                                     |
| Updated Informative Digest                                            | 11346.9                         |                                                                                                           | 1-415                                                            |
| Certification of Close and Complete                                   | 11347.3(b)12                    |                                                                                                           | 1-415                                                            |
| Nine-point Criteria                                                   |                                 | 18930                                                                                                     | 1-407, 1-415                                                     |
| State Fire Marshal Approval                                           |                                 | 18930                                                                                                     | 1-415                                                            |
| CBSC Jurisdiction, Oversight, Adoption, Approval, Format & Publishing | 11343(f)                        | 18909, 18930, 18931, 18932, 18933, 18934.5, 18934.9, 18935, 18938, 18940, 18941, 18942, 18949.1 – 18949.7 | 1-417                                                            |
| General Rulemaking Process (cycles, hearings, meetings, etc.)         | 11349, 11349.1                  | 18929.1, 18930, 18931, 18934.8, 18935, 18936, 18938, 18942, 18949.1 – 18949.7                             | Chapter 1, Article 4                                             |
| Public and Industry Involvement                                       | 11346, 11346.45, 11346.4        | 18934, 18929.1                                                                                            | 1-403                                                            |
| Hearing Date Approval by CBSC                                         |                                 | 18935                                                                                                     | 1-405, 1-413                                                     |
| Adopting Agencies                                                     |                                 | 18930(b), 18935(a), 18949.4                                                                               |                                                                  |
| Coordinating Council                                                  |                                 | 18926                                                                                                     |                                                                  |
| Code Advisory Committee                                               |                                 | 18927                                                                                                     | 1-409, 1-413                                                     |
| Model Code Inclusion/Adoption                                         |                                 | 17922, 18916, 18928, 18928.1, 18930, 18934.7, 18934.8, 18938.3, 18941.6                                   |                                                                  |
| Emergency Regulations                                                 | 11346.1, 11349.6                | 18913, 18926(b)(2), 18934.8, 18937, 18938, 18942                                                          | 1-419                                                            |
| Change Without Regulatory Effect                                      |                                 |                                                                                                           | 1-421                                                            |
| Code Effective Dates                                                  | 11346.1                         | 18934.8, 18938, 18938.5, 18941.5                                                                          |                                                                  |
| Rulemaking File Maintenance                                           | 11347.3, 11348, 11349.2         |                                                                                                           | 1-407, 1-411, 1-415                                              |
| Accessibility of Documents                                            | 11546.7(a), 7405, 11135         |                                                                                                           | 1-407, 1-411, 1-415                                              |

# 2027 Triennial Code Adoption Cycle

2028 California Building Standards Code, Title 24  
Effective January 1, 2029

## California Building Standards Commission

\*Public Participation Opportunity



### Code Advisory Committees (CAC):

SDLF – Structural Design / Lateral Forces  
PEME – Plumbing, Electrical, Mechanical & Energy  
HF – Health Facilities  
GREEN – Green Building  
BFO – Building, Fire & Other  
ACCESS – Accessibility

### Model Code Publishers:

ICC – International Code Council  
IAPMO – International Association of Plumbing and Mechanical Officials  
NFPA – National Fire Protection Association  
\*\*NEC resubmittal if necessary

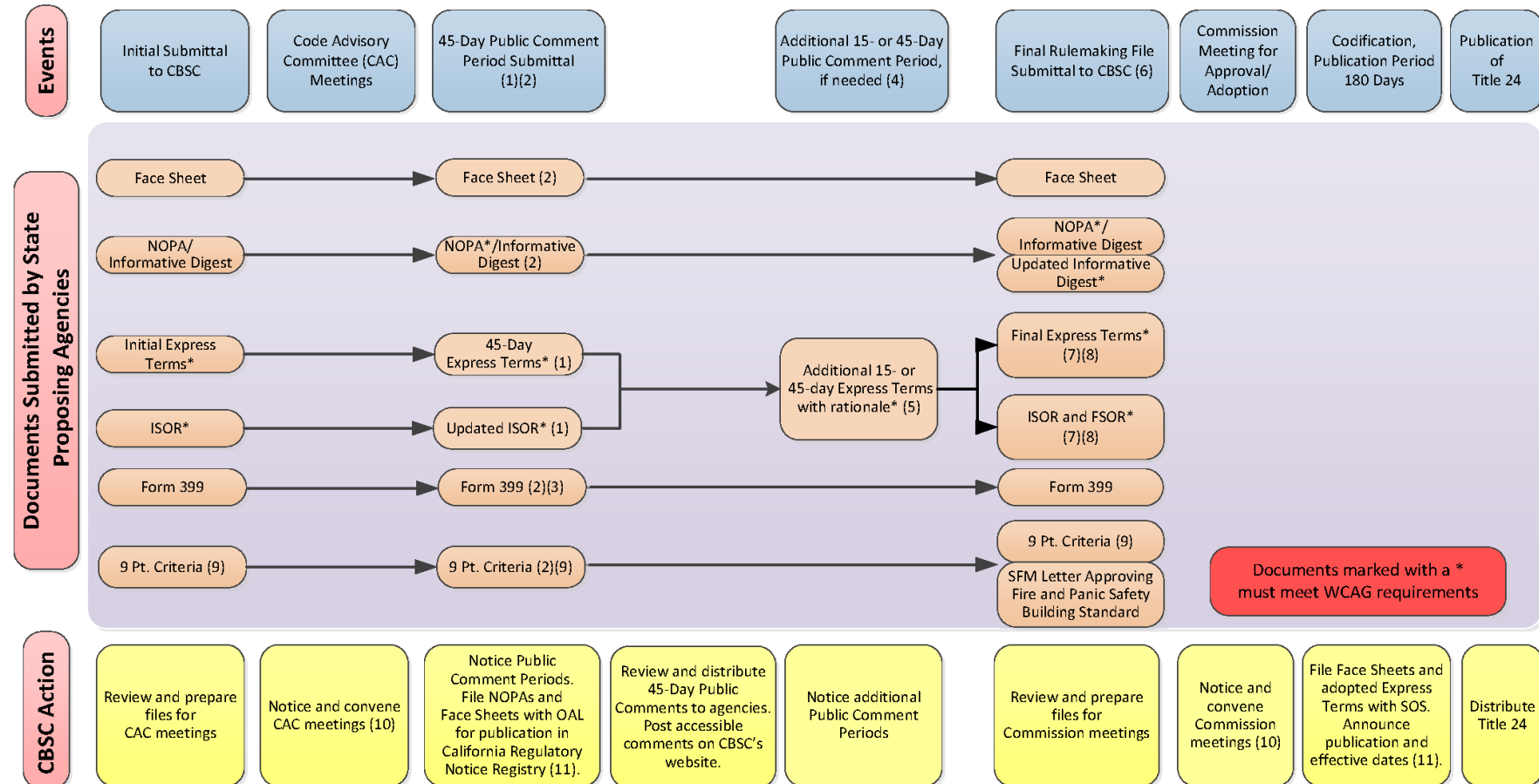


dgs.ca.gov/BS  
(916) 263-0916

Rev. 09/2026  
All dates are subject to change

# Deliverable Documents During the Rulemaking Process

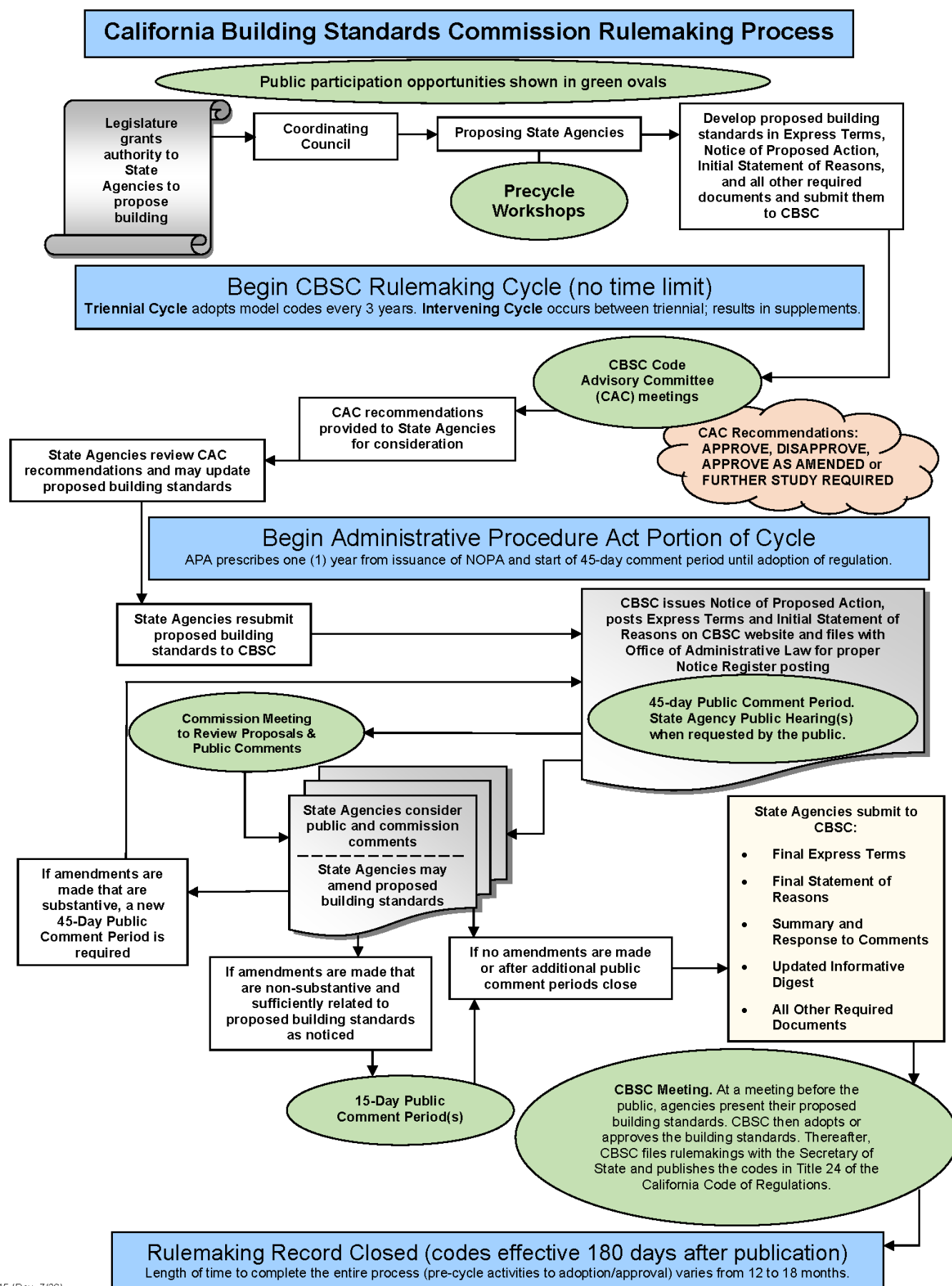
State Proposing Agencies



## NOTES:

- (1) Amend IET and update ISOR to address all CAC comments and recommendations.
- (2) Required only if amended since the initial submittal per Title 24, Part 1, Sec. 1-411.
- (3) Must be signed by agency fiscal officer and agency secretary/highest official before filing NOPA with OAL.
- (4) If an amendment is substantive and NOT sufficiently related to original proposal, a 45-day public comment period is required. An amendment that is substantive and sufficiently related requires a 15-day public comment period. No additional public comment period is required for non-substantive, sufficiently related revisions. See GOV 11346.8(c).
- (5) Should contain only new amendments to proposed language. Follow template legend.

- (6) See Title 24, Part 1, Section 1-415 for a full list of items required.
- (7) Address all public comments in the FSOR and amended ET, if suggestions accepted. Make public comments part of the rulemaking file.
- (8) See GOV 11346.9 and Title 24, Part 1, Section 1-415.
- (9) See HSC 18930(a)(1) through (9).
- (10) CBSC technical staff prepare Commission Action Matrices and Staff Reports for use at meetings of the commission and its committees.
- (11) OAL = Office of Administrative Law. SOS = Secretary of State.



## Dos and Don'ts for Successfully Submitting Rulemaking Documents

Adhering to these requirements will result in successfully submitting rulemaking documents to the California Building Standards Commission (CBSC) and reduce the likelihood of documents being returned for remediation.

### Do:

1. Use the most recent version of rulemaking templates provided by CBSC. Only enter text or information in appropriate fields.
2. Resolve and remove all internal agency comments and edits. Turn off Track Changes in Word.
3. Be sure that item numbers on the Express Terms (ET) and the Statement of Reasons align.
4. Make authority and reference citations relevant and specific to each proposed amendment.
5. Make authority and reference citations match in the ET and Notice of Proposed Action (NOPA).
6. Provide thorough rationales in the Statement of Reasons. The rationale must match the proposed changes in the ET. If the rationale refers to laws and regulations, they must be relevant. Ensure that somebody who is not a subject matter expert can understand why amendments are proposed.
7. Provide appropriate responses and explanations to Code Advisory Committee actions.
8. Every public comment received, even comments submitted by your agency, should only be responded to in the "Objections or Recommendations..." section of the Final Statement of Reasons (FSOR).
9. Change the footer date if the document has been changed.
10. Submit fully accessible documents to be posted to the CBSC website. The Microsoft Word accessibility checker alone does not ensure compliance with state-required document accessibility standards. Refer to Department of Rehabilitation or internal accessibility training for more information. Inaccessible documents will be returned.

### Don't:

1. Use rulemaking documents/templates from a previous cycle.
2. Alter a CBSC template in any manner, including amending the ET legend, other than adding required text in the form fields provided or editing the footer.
3. Copy and paste the same authority and reference citations for all proposed amendments.
4. Provide rationale in the Statement of Reasons that simply describes the proposal or does not explain the reasons why the proposal is necessary. Provide irrelevant information in the Statement of Reasons.
5. Use FSOR section "Updates to the Initial Statement of Reasons" to list all the changes that happened in the ET and/or duplicate comments received during public comment periods.
6. Change 45-day NOPA and ISOR documents in any manner for the Final Rulemaking Submittal.
7. Rely on CBSC staff to provide accessibility training or an extensive list of inaccessible elements if a document is returned.