
BULLETIN: DELEGATION OF AUTHORITY FOR MODULAR AND RELOCATABLE BUILDINGS – FREQUENTLY ASKED QUESTIONS

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

PURPOSE: To inform clients of DSA’s revised application process.

DISCUSSION: DSA has revised the application process for submittal of projects for plan approval and construction certification to include the delegation of authority to the manufacturer’s design professional(s). This applies to the oversight of construction for permanent modular and relocatable buildings fabricated in a manufacturer’s facility (in-plant). This new process applies to applications submitted on or after April 22, 2016.

SUMMARY: Below is a list of frequently asked questions:

1. How has the process changed?

The school district’s architect or structural engineer in general responsible charge of a project shall delegate the responsibility for design, observation of in-plant construction and first-time site installation of newly-constructed buildings to the manufacturer’s design professional (California licensed architect or registered structural engineer) who is responsible for the building design in accordance with section 4-316(b) Part 1, Title 24, CCR. The form *DSA 1: Application for Approval of Plans and Specifications* has been revised, a new form *DSA 1-MR: Application for New Manufactured Permanent Modular or Relocatable Buildings* has been created, and other construction-related documents necessary for certification have been modified. Electronic signatures are accepted on these forms by DSA.

When the school district’s architect or structural engineer in general responsible charge delegates responsibility to the manufacturer’s design professional, it remains the school district architect’s or structural engineer’s responsibility to overstamp and sign or provide a Statement of General Conformance on the manufacturer’s plans and specifications in accordance with *IR A-18: Use of Construction Documents Prepared by Other Professionals*. In addition, the school district’s architect or structural engineer shall be responsible to prepare and submit a form *DSA 140: Application for Approval of Construction Change Document – CCD Category A/B* to DSA for any changes to the approved manufacturer’s building plans or specifications that require a Construction Change Document (CCD) prepared by the manufacturer’s design professional.

2. Why are these revisions being implemented?

In the past, typically the school district’s architect or structural engineer in general responsible charge of a project assumed responsibility for the observation of in-plant construction and the site installation of the building. The building manufacturer’s design professional(s) were only responsible for the building design, but were not required to be listed on the form DSA 1 or to perform in-plant or site observation of the modular or relocatable building construction. These revisions align the responsibilities to the appropriate design professionals in accordance with the California Administrative Code (CAC), the California Architects Practice Act and the Professional Engineer’s Act.

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This new process applies to applications submitted on or after April 22, 2016.

4. What is meant by “first-time” site placement of the building?

First-time site placement applies to a newly constructed modular or relocatable building being placed at a project site for the first time after leaving the manufacturing plant.

5. Will observation of the in-plant construction by the manufacturer’s design professional replace the need for continuous in-plant or site inspection by a DSA-certified inspector employed by the school district/owner?

No, these revisions do not alter the Education Code requirements for continuous in-plant and/or project site inspection performed by a DSA-certified inspector employed by the school district/owner, or for special inspection or material testing performed by a DSA-accepted laboratory employed by a school district/owner.

6. How is the manufacturer’s design professional(s) delegated responsibility?

The form DSA 1 has been revised to require the school district’s architect/structural engineer to delegate the responsibilities to the manufacturer’s design professional(s) by listing them on a new form DSA 1-MR. Prior to submittal of the application, the manufacturer’s design professionals must acknowledge acceptance of their responsibilities by signing the form DSA 1-MR. If the manufacturer contracts or employs multiple architects or engineers responsible for the design of separate disciplines (e.g., mechanical, electrical, structural, etc.), then separate DSA 1-MR forms may be submitted for each individual.

7. Does the manufacturer’s design professional have to perform the observation of in-plant construction?

The manufacturer’s design professional may elect to perform the observation of construction or subdelegate the responsibility to another California licensed architect or registered structural engineer. Election to subdelegate is solely the responsibility of the manufacturer’s design professional as indicated on the form DSA 1-MR.

The form DSA 1-MR requires the name and signature of the delegated architect/structural engineer or subdelegated architect/structural engineer to acknowledge assumption of the responsibility to complete their role in accordance with CAC Section 4-333(a). The individual accepting responsibility must provide a final verified report by completing their portion of the form *DSA 152-IPI: In-Plant Inspector Inspection Card/Verified Report* at conclusion of the in-plant construction. The manufacturer’s design professional need not provide verified reports when subdelegating to the other design professional noted.

8. Must the manufacturer’s design professional observe the actual construction of every building or module constructed in the manufacturer’s plant?

CAC Section 4-336(a) requires that personal knowledge of the construction obtained by the design professional be provided to DSA on a verified report at conclusion of construction in the plant. Since manufacturer’s in-plant processes are repetitive and the quality control procedures are verifiable, for the architect or structural engineer delegated responsibility for observation of in-plant construction of permanent modular or relocatable buildings, personal knowledge may be obtained from: 1) periodic visits to manufacturing plants of reasonable frequency to provide general observation and verify quality assurance of construction practices, and/or 2) project-specific knowledge obtained from the reporting of inspectors and

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special inspectors (or other licensed representative employees of the Laboratory of Record [LOR]) on the progress, material testing, inspection, and superintendence of the work in accordance with the DSA-approved construction documents. Reports may include photos and digital images. The exercise of reasonable diligence to obtain the facts is required.

9. In completing form DSA 152-IPI, does it matter whether the in-plant inspector or the design professional responsible for the in-plant construction sign the verified report first?

No. DSA does not prescribe an order for signing the verified signature blocks on the form DSA 152-IPI. The order is up to the agreement between the in-plant inspector and the manufacturer's architect/structural engineer.

10. Can a building or module be shipped to a project site location before the form DSA 152-IPI has been signed-off and submitted to DSA?

It is the manufacturer's responsibility to ensure that the building or module is NOT shipped to the project site prior to completing and signing the form. If shipped prior to signoff, the project will be subject to a stop work order by DSA. In addition, it is the responsibility of the in-plant inspector to upload the completed and signed form DSA 152-IPI to DSABox and to affix a copy of the form to the building prior to shipping.

Building modules may be shipped to the project site in phases prior to construction of all modules of a building as described in Section 1.7.1 of *PR 13-01: Construction Oversight Process*.

11. Does the manufacturer's design professional have to perform the observation of site construction of first-time placement at the project site?

The manufacturer's design professional(s) is responsible for observation of the construction at the project site for the scope of work that is included on the DSA-approved project plans and specifications under their seal and signature. That individual may elect to perform the observation of construction or sub-delegate the responsibility to another California licensed architect or registered structural engineer. Election to subdelegate is solely the responsibility of the manufacturer's design professional as indicated on the form DSA 1-MR.

The form DSA 1-MR requires the name and signature of the delegated architect/structural engineer or subdelegated architect/structural engineer to acknowledge assumption of the responsibility to complete their role in accordance with CAC Section 4-333(a). He/she shall ensure that the site project inspector has collected and maintains the copy of the form DSA 152-IPI that was affixed to the building upon receipt at the project site.

Since manufacturer's site installation processes are repetitive and the quality control procedures are verifiable for the architect or structural engineer delegated responsibility for observation of site construction of permanent modular or relocatable buildings, personal knowledge may be obtained from: 1) periodic visits to the site of reasonable frequency to provide general observation and verify quality assurance of construction practices, and/or 2) project-specific knowledge obtained from the reporting of inspectors and special inspectors (or other licensed representative employees of the LOR) on the progress, material testing, inspection, and superintendence of the work in accordance with the DSA-approved construction documents. Reports may include photos and digital images. The exercise of reasonable diligence to obtain the facts is required.

12. What verified reports for the site placement are required by the manufacturer's design professional if they are responsible for observation of the site construction?

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Interim and final verified reports on the form *DSA 6-AE: Architect/Engineer Verified Report* are required during site construction. Both are required for completion of the form DSA 152 for the site by the school district/owner's project inspector and for certification by DSA. If the manufacturer's design professional has subdelegated the site construction observation to another design professional, then that individual is responsible for using the form DSA 6-AE as described.

13. Have the procedures for submitting relocation projects been revised?

No, certified relocatable buildings or relocatable buildings for which an in-plant inspector's verified report can be provided may be relocated. This process has not changed. Relocations of new buildings constructed under this revised process will be treated in the same manner as other relocatable buildings.

14. Will relocation of existing DSA-certified relocatable buildings require the manufacturer's design professional to be responsible for observation of site construction?

The manufacturer's design professional will only be required to perform observation of the first-time site installation for newly constructed relocatable buildings after leaving the plant. Subsequent relocations will not require the manufacturer's design professional to be in responsible charge of site observation. In most cases, the school district/owner's architect or structural engineer will assume responsibility for observation of site placement of relocatable structures, for which a form DSA 1-MR will not be required.

15. When project plans submitted by the school district/owner's architect or structural engineer utilize drawings prepared by the manufacturer's design professional, including DSA-approved Pre-Checked (PC) drawings, who is responsible for coordinating the complete plans and specifications, including all modifications to the PC drawings or specifications, prior to submittal?

The school district/owner's architect or structural engineer in general responsible charge is responsible for coordinating any changes to the approved PC drawings resulting from the project requirements, and for ensuring both sets reflect the same requirements, including but not limited to: finish materials, partitions, ceilings, lighting, equipment, fixtures, etc. Non-coordinated drawings may be cause for rejection of the submittal or termination of an over-the-counter appointment. Refer to Section 2 of IR A-18 for additional requirements applicable to modifications of PC drawings or specifications.

16. Does the revised process apply to existing stockpile buildings?

Previously constructed stockpile buildings, regardless of whether the owner of the stockpile is a school district, manufacturer or leasing company, may be placed at a project site as a relocation project provided the existing buildings have been certified by DSA or an in-plant final verified report is provided with the project submittal. Relocation of stockpiled buildings is not considered first-time placement, and a DSA 1-MR is not required.

17. For buildings being newly constructed under a stockpile application, does the revised process apply?

Yes, for those applications submitted on or after the specified date for which this new process applies.

- For applications in which the manufacturer is the owner of the stockpile, the manufacturer's design professional will be in general responsible charge and be listed on the form DSA 1, but a form DSA 1-MR is not required. He/she is

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responsible for observation of in-plant construction; however, he/she may delegate the responsibility for the in-plant observation on the form DSA 1-MR to another licensed architect or structural engineer. (See *IR A-31: In-Plant Project Inspection of Manufacturer's Stockpile of Relocatable Buildings* for employment requirements regarding the in-plant project inspector hired by a DSA-approved Laboratory Evaluation Acceptance laboratory engineering manager.)

- For applications in which the school district or a non-school entity (such as a leasing company) is the owner of the stockpile, either the owner's architect/structural engineer or the manufacturer's design professional will be in general responsible charge and be listed on the form DSA 1. If the owner's architect/structural engineer is in general responsible charge, then he/she must delegate responsibility to the manufacturer's design professional(s) on the form DSA 1-MR. In that case, the manufacturer's design professional(s) may sub-delegate the responsibility for the in-plant observation on the form DSA 1-MR to another licensed architect or structural engineer.

18. Is the manufacturer's design professional responsible for observation of a stockpiled building being placed at a project site?

No, a stockpile application for construction of a building is a separate application from a site placement (relocation) application. A building cannot be moved and placed at a project site under a stockpile application. For stockpile buildings, regardless of whether the stockpile is owned by a school district, manufacturer or leasing company, site placement of buildings will be considered a relocation and the school district's design professional(s) will be responsible to observe the site construction. This applies to buildings being constructed or pending construction under a stockpile application submitted before or after the effective date of this revised process.

19. When is a form DSA 1-MR required and not required?

A form DSA 1-MR is required for projects that include construction of permanent modular and relocatable buildings fabricated in a manufacturer's facility in which the school district's design professional is in general responsible charge of the project and the manufacturer's design professional is responsible for the design of the buildings.

A form DSA 1-MR is not required for:

- Projects in which existing buildings are being relocated (see Item 14). In this case, the owners design professional in general responsible charge listed on the form DSA 1, not the manufacturer's design professional or designee, is responsible for observation of the site placement.
- New construction of a manufacturer's non-school entity's stockpile building(s) in which the manufacturer's design professional is in general responsible charge on the form DSA 1, and he/she retains responsibility for the observation of in-plant fabrication. (Note: If the manufacturer's design professional subdelegates responsibility for observation of in-plant fabrication, then a form DSA 1-MR will be required to identify the subdelegate.)
- Alterations to existing certified buildings under the general responsible charge of the school district's design professional, unless the alterations are constructed in the manufacturer's plant and the responsibility for the alteration design and observation of the in-plant construction has been delegated to the manufacturer's design professional.

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20. Is a form *DSA 5-PI: Project Inspector Qualifications and Approval* or *DSA 5-IPI: In-Plant Project Inspector Qualification and Approval* required for qualification and approval of the in-plant project inspector?

A new form DSA 5-IPI has been created for qualification and approval of the in-plant project inspector and should be provided prior to start of in-plant construction.

21. Which design professional signs the form *DSA 5-IPI* and *DSA 152-IPI* for in-plant inspection of modular or relocatable buildings?

In cooperation with the owner, the manufacturer's design professional delegated responsibility for the design and observation of fabrication of modular or relocatable buildings in Section 1.0 of the DSA 1-MR, or if subdelegated by the individual in Section 1.1, shall submit a form DSA 5-IPI for the in-plant inspector by completing the form and signing Section 7. The school district's design professional listed on line 23 of form DSA 1 is not responsible for submitting the form DSA 5-IPI.

Likewise, the manufacturer's responsible design professional identified in Section 1.0 of form DSA 1-MR, or if subdelegated by his/her sub-delegate in Section 1.1 of form DSA 1-MR, shall sign the form DSA 152-IPI in the section titled Architect or Structural Engineer.

22. Which design professionals sign the form *DSA 5-PI* for the project site inspector for placement of modular or relocatable buildings?

The owner's design professional in general responsible charge completes Section 7 of form DSA 5-PI for the first-time placement or relocation of modular or relocatable buildings.

23. May the manufacturer's delegated design professional submit a form *DSA 102-IC: Construction Start Notice/Inspection Card Request* for the in-plant fabrication of modular or relocatable buildings?

The manufacturer's delegated design professional may submit a form DSA 102-IC for the in-plant fabrication of their modular or relocatable buildings. The owner's design professional in general responsible charge shall submit the form DSA 102-IC for all other project construction, which shall include the site placement of the relocatable or modular buildings.

24. What are the changes to the various forms and documents to implement these revisions?

The following revisions are summarized below.

DSA 1; *DSA 1: Instructions*

- Added the requirement for the design professional to delegate responsibility for design and observation of permanent modular and/or relocatable buildings.
- Provided option for multiple design professionals in general responsible charge and those delegated responsibility within a firm who can assume responsibility.
- Clarified that if more than one individual in a firm is listed, then only the individual who accepts the responsibility for observation of construction shall submit verified reports.

DSA 1-MR

- New form in which the manufacturer's design professional(s) is delegated responsibility.



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- Lists any design professionals subdelegated responsibility for construction observation by the manufacturer’s design professional.
- Requires acknowledgement by all applicable delegated and subdelegated design professionals of their assumed responsibilities.
- If a manufacturer utilizes multiple design firms/individuals (i.e., separate architects and engineers for design of their respective disciplines), then a separate form DSA 1-MR is required for each manufacturer’s design professional.
- If multiple building manufacturers are used on a single application, then a form DSA 1-MR is required for each of the manufacturer’s design professionals.

PR 13-01

- Section 1: Procedure documents have been updated to include construction verification and Project Inspection Card requirements for those design professionals listed on the form DSA 1-MR. Example:

1. REQUIREMENTS FOR USE OF PROJECT INSPECTION CARD (FORMS DSA 152: PROJECT INSPECTOR CARD AND DSA 152-IPI): The DSA 152 is considered to be an interim verified report by the project inspector. The DSA 152-IPI is considered to be the final verified report for the in-plant fabrication of permanent modular or relocatable buildings (see *Section 1.7*).

- Sections 1.7, 1.7.1 and 1.7.2 have been significantly revised and lengthened to reflect requirements associated with this revised process. Please refer to the procedure to review changes.
- Section 1.13: Duties of the design professionals delegated responsibility related to the use of forms DSA 5-IPI, DSA 152 and DSA 152-IPI have been modified to reflect additional language described in Items 7 and 11 above.
- Several sections have been modified to account for the new form DSA 5-IPI.

IR A-18

- **1.3: Documents Prepared by Manufacturer’s Design Professionals for Deferred Building Components and Structures from Approved Pre-Checked (PC) Plans:** When a manufacturer supplies plans and specifications prepared by its design professional for deferred approvals of building components, and structures from approved PC documents, a statement of general conformance shall be used by the design professional in general responsible charge or engineer delegated responsibility for that discipline and:
 - **1.3.1:** A manufacturer’s engineer responsible for the design of building components, procured by the contractor and submitted to DSA for deferred approval in accordance with Section 3 of IR A-19, or for a structure approved by DSA under a previous application for a pre-checked (PC) set of plans that is incorporated in the new project, will not be required to be listed on the DSA 1 Specifications or *DSA 1-DEL: Delegation of Responsibility* (see exception). On-site installation shall be the responsibility of the design professional in responsible charge, or a delegated representative listed on the DSA 1-DEL (see exception) in prior agreement with the owner and all participating parties, in accordance with Title 24, California Code of Regulations. The duties for a delegated professional shall be clearly defined on the DSA 1-DEL (see exception).

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Exception: Design professionals delegated responsibility for design of permanent modular or relocatable buildings are required to be listed on DSA 1-MR: Application for New Manufactured Permanent Modular or Relocatable Buildings and to perform or subdelegate observation of new in-plant construction and first-time installation at the project site, in accordance with DSA 1-MR and PR 13-01.

PR 07-01: Pre-Check Approval Process

1. PURPOSE AND GOAL: The goal of the pre-check (PC) approval process is to streamline DSA plan review by providing a procedure for approving the design of commonly used structures prior to the submittal of plans to DSA for construction projects. The PC approval process allows designers to incorporate designs for structures that have already been “pre-checked” by DSA into their plans for actual site-specific construction projects. When such drawings are used, it is the designer’s responsibility to ensure that their project drawings and the manufacturer’s PC drawings are correctly coordinated and complete prior to submittal to DSA. PC approval is one prerequisite for “over-the-counter” (OTC) review; see DSA Policy *PL 07-02: Over-the-Counter Review of Projects Using Pre-Check Approved Designs* for additional OTC requirements.

PL 07-02

5. CHANGES TO PC DOCUMENTS: Changes to code-regulated aspects of PC documents are not permitted and shall be submitted and reviewed through the regular plan review process. Inconsequential changes may be made to the extent that they can be reviewed within the two-hour OTC time frame. Such changes shall be clouded on PC drawings and signed and stamped in accordance with IR A-18, Section 2. It is the project design professional in responsible charge’s responsibility to ensure that their drawings and the manufacturer’s drawings are correctly coordinated and complete prior to submittal to DSA. Noncoordinated drawings may be cause for termination of the over-the-counter appointment. The original DSA Identification stamp on the affected sheet(s) need not be removed or crossed out.

DSA 6-AE:

- Added signature block for architect/structural engineer delegated responsibility for site placement of modular or relocatable buildings.

DSA 102-IC

- Added data blocks for delegated responsibility for design, observation of in-plant construction, and observation for site placement of modular or relocatable buildings per form DSA 1-MR.
- Added additional lines in existing data blocks for multiple firms and individuals listed on revised form DSA 1.

DSA 152

- Added fields within sections for verification of receipt of form DSA 6-AE for site installation of modular or relocatable buildings.

DSA 152-IPI (Combined Inspection Card and Final Verified Report)

- Added fields for architects/engineers responsible for in-plant observation of construction to sign and date the verified report. The number of signatures must

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match the number of form DSA 1-MRs provided if multiple individuals are delegated responsibility.

- DSA does not stipulate the order for signing the final verified report between the manufacturer’s design professionals and the in-plant inspector.
- Added the statement to the form that “**Buildings shipped by the manufacturer prior to completion and signing of the DSA 152-IPI shall be subject to a STOP WORK ORDER by DSA.**”
- Added statement to the form that “The in-plant inspector shall submit the form to DSAbbox in accordance with PR 13-01 when the structure or module leaves the manufacturing plant and shall affix a copy of this form to each building.”

DSA 291: Laboratory of Record Verified Report

- For in-plant testing and/or inspection performed by a DSA-accepted laboratory, added references to include the form DSA 152-IPI.

DSA 292: Special Inspectors Employed Directly by the District Verified Report

- For in-plant testing and/or inspection performed by a special inspector employed by the school district, added references to include the form DSA 152-IPI.

DSA 5-IPI

- New form provided to provide for approval of the in-plant project inspector by the manufacturer’s design professional, or subdelegate, responsible for observation of in-plant fabrication.