
BULLETIN: REVIEW AND APPROVAL OF CONSTRUCTION OF SCHOOL-BASED HEALTH CENTERS ON PUBLIC SCHOOL CAMPUSES

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

PURPOSE

To provide an overview of Division of the State Architect (DSA) approval requirements for construction and alteration of buildings on public school campuses for use as school-based health centers (SBHCs).

BACKGROUND

With an increase in community interest and federal funding for SBHCs, many districts are providing healthcare facilities on their school campuses. SBHC services are available to students and, in some cases, to members of the public. The services may include medical care, mental health/behavioral health services, and dental care. The most common types of organizations that operate SBHCs are:

- Federally qualified health centers
- School districts
- County health departments
- Hospitals

1. OVERVIEW OF FACILITIES REQUIREMENTS FOR SBHCS

DSA has jurisdiction over public school construction projects (K–12 and community colleges), reviews and approves project plans for compliance with Title 24 building standards (California Code of Regulations) and provides construction oversight. Most SBHC facilities projects are under the jurisdiction of DSA because they are located on public school campuses. When a proposed SBHC facility is to be housed within a new building (to be built) or housed within an existing building (to be altered) on a public school campus, the school district owner is responsible for obtaining DSA approval of the design and construction work, in accordance with Section 3 below.

In addition, many SBHC facilities projects may require review by the California Department of Public Health (CDPH) and compliance with Title 24 OSHPD-3 requirements, as outlined in Section 4 below.

In all cases, the school district and the non-school district entities that are involved in the project should work in close partnership with each other, with DSA and any relevant state and local government entities, to ensure that the facility meets all relevant requirements.

2. GENERAL REQUIREMENTS FOR SCHOOL BUILDINGS

DSA oversees construction projects on California public school campuses by providing plan review and approval, and construction oversight of projects, in response to applications from California school districts.

DSA's oversight for structural safety of school facilities is governed by the provisions of the Field Act contained in the California Education Code, Sections 17280, et. seq. In summary, the Field Act imposes the following requirements on California schools aimed at ensuring structural safety

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of school buildings:

- Licensed design professionals must prepare drawings and specifications (construction documents) for proposed construction work.
- Construction documents must be verified by DSA for compliance with applicable building codes.
- A project owner (school district) must hire a DSA-certified project inspector to oversee construction and a testing laboratory accepted by DSA to perform necessary tests and special inspections. The inspector must be approved by the project design professional(s) and DSA.
- Changes to approved construction documents for DSA-regulated portions of the project shall be approved by DSA prior to commencement of work.
- At the conclusion of construction, the design professionals, the inspector and the contractor shall file verified reports with DSA indicating that the work has been performed in compliance with the DSA-approved construction documents.

3. TYPES OF PROJECTS REQUIRING DSA REVIEW

Typically, the following types of projects require DSA review and approval for compliance with Title 24 (California Building Standards):

- New construction of school buildings and structures.
- Additions to existing school buildings.
- Alterations to existing school buildings.
- Installation of new and relocation of existing relocatable school buildings.
- Rehabilitation, defined as retrofitting of an existing nonconforming building (or a school building conforming to earlier code requirements) to bring the building, or portion thereof, into conformance with current safety standards.

Any time the SBHC facilities are to be housed within an existing school building or will be housed within a stand-alone building located on a school campus, DSA review and approval must be obtained, unless the project meets the provisions of DSA Interpretation of Regulations (IR), as described below.

There are two types of exemptions that may be applicable to SBHC facilities:

3.1 Alteration projects with estimated construction cost below a specified amount may be exempt from DSA review when certain requirements are met. For detailed information regarding this type of exemption, refer to DSA Interpretation of Regulations (IR) A-22: *Construction Projects Exempt From DSA Review*.

3.2 In the event that the SBHC facilities will be housed in a stand-alone relocatable building on an existing school campus, and the district elects to utilize the provisions of Education Code section 17296, the building construction may be exempted from being reviewed and approved by DSA (a relocatable building has an integral floor structure which is capable of being readily moved; a relocatable typically consists of two or more factory-built modules). In this case, the governing board of the school district must make a resolution to utilize Education Code section 17296 and shall ensure that the construction of the SBHC facility proceeds with all applicable approvals, including approvals by the building department of the appropriate local jurisdiction.

Additionally, the provisions of Section 4-310, Part 1, California Administrative Code shall be

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met. SBHC buildings not approved by DSA shall not be used by students and teachers for school purposes, including housing the school nurse and his/her office for treatment of students and teachers. The buildings shall be fenced (without gates) from the school campus a minimum distance equal to the height of the structure. The school board shall pass a resolution stating the building will not be used for school purposes by students and teachers. The building shall be posted with a sign pursuant to Education Code section 17368.

If and when the SBHC function of the facility is discontinued, the school board must remove the relocatable building from the campus or rehabilitate it for school use in accordance with Section 4- 307, Part 1, California Administrative Code.

4. SUPPLEMENTAL TITLE 24 REQUIREMENTS

Community clinics, which provide healthcare services at many SBHCs, are licensed by CDPH, and their facilities require an architect or local building department's confirmation of compliance with Title 24, Part 2, California Building Code for OSHPD-3 facilities. OSHPD-3 requirements for clinics are applied to facilities that are licensed pursuant to Health and Safety Code section 1200 (which includes primary care clinics and specialty clinics) or Health and Safety Code section 1250 (which includes outpatient services of a hospital).

Compliance with Title 24 standards for clinics is the responsibility of the SBHC operator and its design professional(s). DSA review does not include verification of compliance with Title 24 standards for clinics (OSHPD-3).

ADDITIONAL RESOURCES:

For more information regarding SBHCs, visit the California School Health Centers Association webpage at www.schoolhealthcenters.org, or contact by phone at (510) 268-1260.

For a detailed description of DSA review and approval process, visit the DSA website www.dgs.ca.gov/dsa. For questions related to the plan review and construction oversight, contact the DSA Regional Office with jurisdiction over the county in which the school district is located.

If a licensed community health clinic will provide services at the SBHC, it should review the CDPH requirements, including OSHPD-3 compliance, which are in addition to DSA requirements. This information is available at CDPH website at www.cdph.ca.gov.