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## **BULLETIN: DSA ASSISTANCE DURING THE COVID-19 PANDEMIC FOR EMERGENCY SCHOOL FACILITIES**

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

### **PURPOSE**

This bulletin is to provide guidance to school districts in need of rapid placement of new buildings or structures or alterations to existing school buildings or structures, and temporary sanitation-related amenities such as hand washing stations due to emergency program needs in response to the COVID-19 pandemic.

### **BACKGROUND**

DSA has historically assisted school districts in expediting emergency replacement housing after disasters. California Administrative Code (CAC), Section 4-302(b), Part 1, Title 24 CCR allows for relocatable buildings to be installed for school purposes immediately following disasters such as earthquakes, fires, floods, and other unanticipated emergency classroom needs prior to receiving DSA approval. For further guidance on emergency procedures, please review *IR A-1: Approval for Temporary School Use of DSA Approved Relocatable Buildings*.

### **IMPLEMENTATION**

DSA has determined that the COVID-19 pandemic constitutes an unanticipated emergency and will make every effort to prioritize plan review of emergency projects needed for schools to reopen safely. Clients should contact the local DSA Regional Office for preliminary discussion of project scope and construction deadlines so that DSA may schedule our staff to meet necessary goals. Applications are still required to be registered using form *DSA 1-REG: Registration for Project Submittal* prior to submittal.

This bulletin provides guidance for emergency installation of temporary, permanent, and new school buildings and structures in response to COVID-19. It also provides guidance for review of alterations to existing buildings, and for temporary installation of portable sanitation-related equipment in response to COVID-19.

DSA reserves the right to rescind this document at any time with notice.

### **1. TEMPORARY BUILDINGS OR STRUCTURES**

New relocatable buildings and structures may be temporarily installed for a maximum period up to 3 years in accordance with IR A-1. Temporary buildings may exempt specific fire alarm and/or sprinkler requirements during the 3-year period. Previously constructed relocatable buildings may be installed on a site prior to obtaining DSA approval. Districts must notify DSA within 14 days after placement of a building(s) or structure(s) and plans for the building(s) or structure(s) shall be submitted for review and approval by DSA within 60-days following installation. Work during installation requires project inspection and material sampling, testing and special inspections in accordance with CAC Sections 4-333 and 4-335, respectively.

If an unanticipated need for the building(s) for school use exceeds three years, the school district shall notify DSA, and DSA may extend the temporary approval for an additional three years. Otherwise, temporary buildings or structures must be made permanent by application for DSA approval or shall be removed from the school site.

DSA has determined that shade structures may also be installed utilizing the same procedure as for buildings under Section 1 of IR A-1. This applies to new permanent or temporary shade

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structures constructed to 2016 or 2019 California Building Code (CBC) DSA-approved Pre-checked (PC) plans.

### **2. PERMANENT BUILDINGS OR STRUCTURES**

Expedited over-the-counter plan review is available for any buildings or structures utilizing DSA-approved PC plans in accordance with policy *PL 07-02: Over-The-Counter Review of Projects Using Pre-Check Approved Designs*. For buildings or structures not pre-approved as a PC, clients should request a preliminary meeting with DSA regional office supervisors to discuss project scope and construction deadlines as described above.

### **3. ALTERATIONS TO EXISTING BUILDINGS OR STRUCTURES**

Alteration of existing buildings or structures shall comply with Part 1, Title 24, CCR, including exemptions that may apply based upon the scope of work and/or cost of the project in accordance with *IR A-22: Construction Projects and Items Exempt from DSA Review*. Alteration projects under the cost threshold in Section 1.3.2.1 (currently \$110,422 in 2021) may not require DSA review and approval of plans. Alteration projects under the cost threshold in Section 1.3.2.2 (currently between \$110,422 and \$248,448 in 2021) that do not require any work of a structural nature do not require structural review, provided fire safety and access compliance requirements identified in the section are met. Inspection of alteration work shall be required in accordance with IR A-22.

Clients are encouraged to review IR A-22 for alteration projects and to contact the respective local DSA Regional Office supervisor with any questions or to schedule a preliminary meeting.

### **4. TEMPORARY PORTABLE SANITATION STATIONS**

Temporary portable handwashing stations and other portable sanitation-related equipment may be installed for public, student and teacher use without DSA approval; however, such equipment shall not be placed in a location which will obstruct egress and fire-access or accessible routes. Inspection by a DSA-certified project inspector shall not be required for installation of portable sanitation stations or other sanitation-related equipment.

### **5. FIRE AND LIFE SAFETY AND ACCESS COMPLIANCE REQUIREMENTS FOR TEMPORARY FACILITIES**

Whether or not projects are submitted to DSA, the CBC requirements apply to all temporary facilities, including fire and life safety requirements and access compliance requirements. An accessible route must be provided to all temporary facilities, structures, restrooms, and portable sanitation equipment provided for use by the public, faculty and staff. Portable sanitation equipment must meet access compliance requirements for clear floor spaces, reach ranges, and operable parts. DSA Fire and Life Safety and Access Compliance Supervisors are available for consultation to address immediate concerns related to the application of CBC requirements to temporary or portable facilities.

### **6. CALGREEN REQUIREMENTS FOR TEMPORARY FACILITIES**

The Minimum Rehabilitated Landscape Area requirements of CALGreen Section 301.4 will be waived for placement of temporary relocatable buildings on campuses in response to the COVID-19 pandemic. If temporary use exceeds three years, the school district shall notify DSA, and DSA may extend the temporary approval for an additional three years. Otherwise, temporary buildings or structures must be made permanent by application for DSA approval whereby the requirements of CALGreen Section 301.4 will then be enforced.

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### 7. TENTS OR MEMBRANE STRUCTURE REQUIREMENTS FOR TEMPORARY FACILITIES

Tents or other membrane structures may be used for temporary facilities in accordance with the following subsections. For temporary facilities installed under sections 7.1 and 7.2, the school district superintendent or facilities director shall provide a letter notifying DSA of the intended use and duration of a tent structure(s) as a temporary facility.

**7.1** For tents erected for 180 days or more, structural safety, fire and life safety, and access compliance review will be required for full compliance with 2019 California Building Code (CBC) in accordance with Section 3102.1.

**7.2** For tents erected for less than 180 days, structural safety review will be required for full compliance with the CBC for the tent structure; however, foundations and anchorage systems to resist lateral sliding and uplift from wind forces may be temporary in nature per Sections 3102.1 and 3103. Fire and life safety and access compliance review will be required for full compliance with the CBC.

**7.3** Tents smaller than 120 square foot (sq. ft.) that are erected for less than 180 days or tents smaller than 400 sq. ft. that are erected for less than 42 days may be exempt from DSA review per Chapter 3103.1.2; however, for these projects the school district assumes responsibility to ensure compliance with all accessibility code provisions of the currently effective California Code of Regulations and for provisions of the California Fire Code.

For alternative consideration, DSA has approved Pre-checked plans for shade structures, including fabric shade structures. The DSA Approved Pre-Check list on our website is available on the [DSA Databases and Listings webpage](#).

### 8. OFF-CAMPUS FACILITIES FOR TEMPORARY FACILITIES—USES LIMITED

Off-campus leased facilities for temporary or longer-term K-12 public school use are not permitted in accordance with Education Code (Ed. Code) Section 17285(a); except that leased buildings may be used by a school district for a regional occupation center or program for up to three years per Ed. Code 17285(c), or for a teen pregnancy and parenting program in accordance with all provisions of Ed. Code 17293.

In addition, school districts may use facilities that are not defined in the Ed. Code as “school buildings”, which do not require DSA approval and certification, as follows:

- a) Per Ed. Code 17287, buildings which are used solely for classes or programs in outdoor science, conservation, and forestry and which do not occupy, in whole or in part, the same parcel of land upon which there is situated any school maintained by the district or county superintendent, or for agricultural education laboratory facilities used primarily for plant and animal production, or the storage of materials, equipment, and supplies involved in this production.
- b) Per Ed. Code 17289, buildings to provide alternative, community-based educational opportunities through independent study programs for up to 2 years (renewable) provided the district demonstrates to the State Allocation Board compliance with all provisions of EDC 17289.
- c) Per Ed. Code 17296, buildings on school campuses used for any school-based facility providing social or support services, health care or integrated-children’s services that are established through agreements with local governments and school districts, and approved by the local building official, provided all provisions in Ed. Code 17296 are in compliance and justified to DSA.

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A DSA Bulletin is a notification to its stakeholders regarding any issue intended to be directed to a broad group of external stakeholders as well as DSA staff.