



Disciplines: Structural History: Revised 07/13/23

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

PURPOSE

This Interpretation of Regulations (IR) clarifies requirements relating to the certification and approval of school construction project inspectors (PI). All PIs must complete this two-step process of certification and approval by DSA before they are permitted to work on school construction projects.

SCOPE

Certification and Approval – A Two-Step Process.

Certification

Section 1 of this IR explains how to become a DSA-certified PI and maintain such certification. Certification is the first step in becoming a school construction PI. Certification attests that the inspector is qualified to inspect construction projects under DSA jurisdiction.

Approval

Section 2 below describes the DSA approval requirements and process for a PI to perform inspections on a particular project. Approval is the second step and must occur for every project. Approval of the PI by a DSA regional office must be obtained using the form DSA 5-PI: Qualifications and Approval of the Project Inspector, before the inspector is permitted to work on a project. Duties of inspectors are described in IR A-8: Project Inspector and Assistant Inspector Duties and Performance. The acceptance and approval of assistant inspectors (AI) follows similar critera as described for the PI and is clarified in Section 3 below.

Section 4 of this IR briefly covers withdrawal of a PI's project approval and/or certification.

BACKGROUND

Statutory and regulatory requirements entail PIs must be both DSA certified and approved to perform inspections on projects under DSA purview.

Given the nature of inspections performed on a given project, DSA has developed different PI classifications (see California Administrative Code [CAC] 4-333.1). Those PI classifications are tied to project classification, which is usually driven by the highest structure classification on a project. Clarification of the different classifications are provided in this IR through examples.

PI project approval is dependent on consistency of the project and PI classification as well as the PI's experience on similar projects amongst other criteria. A PI's experience is crucial to ensuring proper construction compliance verification with DSA-approved construction documents given the variability in acceptable construction materials and methods. Procedural details of PI project approval in CAC 4-333 and 4-341 are described in this IR.

1. CERTIFICATION OF THE INSPECTOR

As required by law, all PIs must be certified through the DSA Project Inspector Examination Program.

Examinations are given in each of three project classes. The examinations measure the applicant's ability to read and comprehend construction plans and the California Building Standards Code.

The DSA Project Inspector Examination Program does **not** qualify an applicant as a "special" inspector.

1.1 Class 1 Projects and the Class 1 Examination

Projects that are designated as Class 1 must contain one or more "Class 1 structures" (as defined below) but may also contain Class 2, Class 3 or Class 4 structures. The Class 1 examination is comprehensive; it tests the applicant's knowledge of Class 1, Class 2, Class 3 and Class 4 structures, and related code requirements.

Class 1 Structures

- **1.1.1** New buildings or additions of 2,000 square feet in floor area or greater that utilize materials other than wood-frame shear walls (e.g., concrete shear wall or moment-resisting frames, masonry shear walls, steel braced or moment-resisting frames) as the primary lateral load-resisting system.
- **1.1.2** Substantial structural alterations to the gravity and/or lateral load-resisting system of the building types described above.

1.2 Class 2 Projects and the Class 2 Examination

Projects that are designated as Class 2 must contain one or more "Class 2 structures" (as defined below) but may also contain Class 3 or Class 4 structures. The Class 2 examination tests the applicant's knowledge of Class 2, Class 3 and Class 4 structures, and related code requirements.

Class 2 Structures

- **1.2.1** New buildings or additions over 2,000 square feet in floor area that utilize wood-frame shear walls as the primary lateral load-resisting system. Projects may be single- or multilevel, with no upper limit in floor area. The project may contain incidental masonry, concrete and/or structural steel construction (e.g., gravity load carrying columns and beams). Buildings may have isolated exceptions to the lateral load-resisting system, such as a steel brace frame at one location in the structure. Cellular or communication poles (not including truss towers) and field or stadium lights are considered Class 2 structures.
- **1.2.2** New buildings or additions of less than 2,000 square feet in floor area that have primary lateral load-resisting systems utilizing concrete, masonry or steel construction. A single-story masonry building with a regular configuration, a floor area of less than 7,000 square feet, and a wood-frame roof structure may be considered to be a Class 2 structure. Steel cantilevered structures of a repetitive nature (e.g., carports with solar panels, etc.) exceeding 2,000 square feet in area may be considered a Class 2 structure unless DSA determines the nature or complexity warrants a higher classification.
- **1.2.3** On-site construction of two-story permanent modular buildings.
- **1.2.4** Alteration/modernization and reconstruction projects that exceed the limitations of the Class 3 scope of work and do not include substantial alterations to structural systems of concrete, steel or masonry.
- **1.2.5** Non-building structures that exceed the limitations of the Class 3 scope of work.

1.3 Class 3 Projects and the Class 3 Examination

Projects that are designated as Class 3 must contain one or more "Class 3 structures" (small buildings of wood-frame construction and/or alteration/modernization projects) but may also contain Class 4 structures. The Class 3 examination tests the applicant's knowledge of both Class 3 and Class 4 structures, and related code requirements.

Class 3 Structures

1.3.1 Class 3 Structures

- **1.3.2** New buildings or additions of wood frame, single-story construction, with conventional (spread footing) concrete foundations and a total floor area less than 2,000 square feet. Structures must utilize wood-frame shear walls as the primary lateral load-resisting system. The project may include isolated steel or concrete elements (e.g., steel or concrete columns).
- **1.3.3** Structural alteration projects limited to wood-frame, single-story construction. When deemed appropriate by DSA, alterations to (or addition of) isolated steel, masonry or concrete elements may be included in Class 3 projects. For example, alterations or additions to relocatable buildings or cell tower appurtenances may be considered a Class 3 project. However, alteration projects involving significant changes to the lateral load-resisting system may be classified as Class 1 or 2 projects.
- **1.3.4** Alteration and modernization projects that are primarily non-structural, such as electrical, mechanical, plumbing, accessibility features and site improvement work.
- **1.3.5** Non-building structures, such as signs and poles, less than 35 feet in height, bleachers with a maximum of five rows of seats, walls less than 10 feet in height above grade, and singlestory isolated canopies less than 200 square feet or, for pre-checked (PC) fabric shade structures (without field welding nor high-strength fastener installation), less than 2000 square feet in horizontal projected area.

1.4 Class 4 Projects

Projects that are designated as Class 4 only include "Class 4 structures" (e.g., site installation of pre-manufactured, single-story relocatable buildings and related sitework). The Class 4 examination is no longer administered and Class 4 certifications are no longer issued; however, any Class 4 project may be inspected by any DSA-certified PI (except Relocatable Building In-Plant inspectors).

1.5 Relocatable Building In-Plant (RBIP) Inspector

Inspectors of factory-built relocatable buildings must either be a DSA-certified RBIP inspector or a Class 1, 2 or 3 DSA-certified PI. All appropriately certified PIs (i.e., PI class is consistent with the classification of factory-built relocatable buildings) and inspectors on the approved RBIP list will be eligible to perform RBIP inspection on projects under DSA jurisdiction. DSA no longer issues RBIP certifications. DSA-certified or RBIP inspectors having an American Welding Society (AWS), Certified Welding Inspector (CWI) or Senior Ceritified Welding Inspector (SCWI) certification and who will be performing structural welding inspection may indicate such on their form DSA 5-IPI: In-Plant Project Inspector Qualification and Approval without need for filing a separate form DSA 5-SI: Special Inspector Qualification and Approval.

1.6 Assistant Inspectors (AI)

These are additional DSA-certified Class 1, 2, 3 or 4 project inspectors who, based on certain project conditions, act in the capacity as an assistant to the "lead" PI. Certain project conditions may include but are not limited to project size, complexity, construction pace and construction cost (benchmark/guide of \$35,000,000 as of 2022). The need for an Al shall be discussed with the DSA District Structural Engineer (DSE). DSAs approval of the PI may be contingent upon additional support from an AI.

1.7 Expiration and Recertification

An inspector's certification expires four years from the date of issue. To renew the certification, each inspector must complete the requirements of the DSA inspector recertification program every four years as described in the "How To Recertify A Project Inspector" section of the Apply and Maintain Project Inspector Certification DSA webpage.

1.8 Specific Examination Information

The DSA PI examination program is administered by the DSA Headquarters Office. For information regarding the examination schedule, locations, examination fees, or to obtain an application, contact DSA by phone at (916) 443-9932, or online at DSA's website.

2. APPROVAL OF THE PROJECT INSPECTOR

As required by law, all PIs must be DSA-approved for work on each individual project. All DSA PIs must maintain valid certification throughout the duration of assignment to any project and fulfill the requirements of DSA's recertification program as necessary. Newly certified PIs without prior DSA project inspection experience shall complete the DSA Project Inspector Overview Class prior to inspecting their first project. PI approval for work on 2019 or later code-based projects commencing in 2022 or later may be contingent upon completion of the Title 24 Mechanical Acceptance Training, (Refer to the "How To Recertify A Project Inspector" section of the Apply and Maintain Project Inspector Certification DSA webpage for further information.)

To apply for approval, the design professional in general responsible charge must submit a form DSA 5-PI to the appropriate DSA regional office to ensure DSA approval of the inspector prior to the start of construction.

For projects involving construction of permanent modular or relocatable buildings, the submittal requirements are the same except the design professional delegated responsibility for the observation of in-plant construction in Section 1 or, when subdelegated, Section 1.1 of the form DSA 1-MR: Application for New Manufactured Permanent Modular or Relocatable Buildings, shall submit form DSA 5-IPI instead.

For projects requiring the use of an AI, the submittal requirements are the same as follows except the design professional in general responsible charge must submit a form *DSA 5-AI:* Assistant Inspector Qualification and Approval to the appropriate DSA regional office for approval. See Section 3 below.

For approval on Class 1 and Class 2 projects

Before submitting a form DSA 5-PI (5-IPI or 5-Al when applicable) for Class 1 or Class 2 projects, it is recommended the design professional in general responsible charge consults with the DSE assigned to the project. The design professional and the DSE should review the inspector's qualifications for the project with regard to DSA approval criteria (see *DSA Approval of the Project Inspector* in Section 2.1.5 below). The use of Als should also be considered at this time.

2.1 Review of the Inspector's Qualifications by the School District and Responsible Design Professionals

The following four items must be reviewed by the design professional in general responsible charge, the structural engineer delegated responsibility for observation of construction, and the school district prior to submitting the form DSA 5-PI (5-IPI or 5-AI when applicable) to the respective DSA regional office for inspector approval:

2.1.1 The Class of the Inspector's Certification and the Project Class

The project's classification is determined by DSA during plan review, and is indicated on the Approval of Plans notification (issued after DSA approval of plans and specifications). The project classification can also be verified online at DSA's eTracker website.

Pls with Class 1 certification may apply for DSA approval to inspect *any* project. Pls with Class 2 certification may apply for approval to inspect projects that are designated as Class 2, 3 or 4. Pls with Class 3 certification may apply for approval to inspect projects that are designated as Class 3 or 4. Pls with Class 4 certification may apply for approval only to inspect Class 4 projects.

2.1.2 Inspector's Work Experience

DSA approval is contingent upon the inspector's experience in inspection or construction work on building projects of a type similar to that of the individual project for which the inspector is applying. The inspector must describe, on the form DSA 5-PI (5-IPI or 5-AI when applicable), qualifying experience from three building construction projects. Qualifying experience is defined by the types of duties performed and the types of projects on which those duties were performed.

Types of Duties

Prior job positions and responsibilities are the primary considerations of qualifying experience. The inspector's prior responsibilities for either inspection or construction should include experience with the trades that will be utilized on the project for which the inspector is applying. Job positions that may provide qualifying experience include:

- **2.1.2.1** PI (providing continuous inspection of an entire project). Prior experience as a PI is required for Class 1 and large Class 2 projects.
- **2.1.2.2** Health Care Access and Information (HCAI formerly Office of Statewide Health Planning and Development [OSHPD]) Class A inspector.
- 2.1.2.3 DSA-approved Al.
- **2.1.2.4** Lead project construction superintendent.
- **2.1.2.5** Building official's representative in building code enforcement.
- **2.1.2.6** California registered civil or structural engineer, or licensed architect performing construction observations applicable to that role.
- **2.1.2.7** Special inspector or construction trade journeyman. These positions provide qualifying experience only in the specific trade(s) in which the individual worked.

Other job positions are unlikely to provide sufficient experience for approval by DSA as a PI.

Types of Projects

The types of projects that provide qualifying experience must be relevant to the type of project for which the inspector is applying. Project aspects (both for prior projects and the project for which the inspector is applying) that must be considered include:

- **2.1.2.8** Materials of the structural system (wood-frame, concrete, masonry, steel).
- **2.1.2.9** Complexity of the structural system (configuration of buildings, number of floors and unusual design features).
- **2.1.2.10** Size (square footage of new construction, total construction cost).

2.1.3 On-Site Presence of the Project Inspector

Two important aspects must be considered:

During Construction

The inspector must be present on the jobsite or in the plant (for permanent modular or relocatable buildings) as needed to provide continuous inspection of all the work (refer to California Administrative Code [CAC] Section 4-342[b]1 for additional information). The inspector's schedule must allocate sufficient time to perform all required duties on the project for which the inspector is applying.

The inspector must indicate on the form DSA 5-PI (5-IPI or 5-AI when applicable) whether presence on the jobsite will be full-time (40 hours per week or more) or part-time (less than 40 hours per week). Large projects usually require a full-time commitment from the inspector.

Time Commitment

If the inspector has other work commitments concurrent with the project for which the inspector is applying, each school project, each non-school project, and/or any other employment commitment must be described as indicated on the form DSA 5-PI (5-IPI or 5-AI when applicable). If the combined work between multiple projects is approximately 60 or more hours per week, the following is required:

- **2.1.3.1** Justification that sufficient time will be spent on the project while accounting for travel between projects.
- **2.1.3.2** When requested, a workload schedule accounting for all work commitments that is coordinated with the construction schedule for the project for which the inspector is applying.
- **2.1.3.3** A notification to all school districts and DSEs for those multiple projects.
- **2.1.3.4** Letters or emails of acknowledgement from those school districts and, when requested, DSEs working on those projects must be included with the form DSA 5-PI, 5-IPI or 5-AI when applicable).

Any future increase in workload on non-DSA projects beyond that identified in the form DSA 5-PI (5-IPI or 5-AI when applicable) without a corresponding workload decrease (i.e., a net increase) thereby resulting in a total workload of approximately 60 or more hours per week shall be communicated to the respective DSE for their consideration of whether adequate on-site inspector presence can be maintained.

During the initial inspector evaluation for the project, the responsible design professionals, the school district and DSA must conclude that the inspector's schedule will allow for an adequate presence on the jobsite. In the event that the school district, the responsible design professional(s) or DSA conclude that the inspector's schedule as described on the form DSA 5-PI (5-IPI or 5-AI when applicable) will not allow for sufficient presence on the jobsite, the inspector will be afforded an opportunity to provide additional information for re-evaluation.

2.1.4 School District and Design Professional's Interview of the Inspector

DSA recommends that the school district and the responsible design professional(s) conduct a personal interview with the inspector before signing the form DSA 5-PI (5-IPI or 5-AI when applicable).

The following points should be considered:

2.1.4.1 Inspector's knowledge of his/her role and responsibilities, job duties and limits of authority.

- 2.1.4.2 Inspector's characteristics that are necessary to develop and maintain satisfactory working relationships. Such characteristics include effective communication skills, patience, determination, consistency and the ability to exercise sound judgment.
- 2.1.4.3 Inspector's physical ability and stamina to inspect all construction, and to maintain a responsive presence on the job.
- 2.1.4.4 Inspector's ability to provide a responsive presence on the job while accounting for time commitment on other concurrent projects and travel time between them.
- 2.1.4.5 Inspector's knowledge of construction methods, building materials, material testing/special inspection procedures and building codes applicable to the project. The inspector must be able to read and readily comprehend the requirements of the project plans and specifications.

2.2 DSA Approval of the Project Inspector

The PI must be DSA-approved for each individual project. The DSE's approval of the proposed inspector is based on the following criteria:

- **2.2.1** The proper relationship between the class of the inspector's certification and the project's classification, as described in Section 2.1.1 above.
- **2.2.2** The inspector's work experience, as described in Section 2.1.2 above.
- 2.2.3 The inspector's workload and time commitment to the project, as described in Section 2.1.3 above.
- **2.2.4** The utilization of Als, as described above and in IR A-8.
- **2.2.5** Satisfactory performance on previous school construction projects.
- **2.2.6** Verification that the inspector is employed by the school district.

Exception: Manufacturer's stockpile projects shall have the DSA-accepted Laboratory of Record employ the in-plant inspector.

2.2.7 Verification that newly certified inspectors without prior DSA project experience have completed the DSA Project Inspector Overview Class prior to inspecting their first project.

If the inspector meets the requirements for approval, the DSE or field supervisor will sign the form DSA 5-PI (5-IPI or 5-AI when applicable), which indicates DSA approval. A copy of the signed form DSA 5-PI (5-IPI or 5-AI when applicable) will be posted to DSA's electronic filing system as indicated in PR 13-01: Construction Oversight Process.

If DSA is unable to grant approval, the form DSA 5-PI (5-IPI or 5-AI when applicable) will be promptly returned to the design professional in general responsible charge, with documentation of the reason(s) why approval was not granted. The proposed inspector may be reconsidered for approval if these documented reasons are satisfactorily addressed on the resubmitted form DSA 5-PI (5-IPI or 5-Al when applicable).

3. APPROVAL OF AN ASSISTANT INSPECTOR

All Als must be DSA-certified Class 1, 2, 3 or 4 Pls, and must maintain their certifications and complete all training as noted in Section 1 above.

Als must also be DSA-approved for work on each individual project with the design professional in general responsible charge submitting a form DSA 5-Al to the appropriate DSA regional office for approval.

The approval of Als essentially follows the same process as outlined in Section 2 above with the following additions/clarifications:

- 3.1 The form DSA 5-Al must clearly identify the scope of all construction work that the Al will inspect and any other code-prescribed duties that they will perform.
- 3.2 Only DSA-certified Class 1 or 2 PIs are permitted to utilize AIs.
- 3.3 The PI (Class 1 or 2 only) must also interview the AI and complete their affidavit on the form DSA 5-AI.
- 3.4 The form DSA 5-Al must be submitted to the applicable DSA regional office at least 10 working days prior to the commencement of the Als work on the project.

4. WITHDRAWAL OF APPROVAL AND/OR CERTIFICATION

The DSE observes the PI's performance of code-prescribed duties during the course of construction. IR A-8 describes the required duties and responsibilities of the PI. Failure to perform duties as required may result in the withdrawal of approval and/or certification of the PI pursuant to CAC Section 4-342. Should the school district terminate the inspector's employment prior to project completion, the school district shall confer with DSA and provide the basis for termination. The design professional in general responsible charge shall obtain DSA approval of a replacement PI prior to continuation of construction work.

REFERENCES:

California Code of Regulations Title 24

Part 1: California Administrative Code, Sections 4-333, 4-333.1, 4-341, and 3-342

This IR is intended for use by DSA staff and by design professionals to promote statewide consistency for review and approval of plans and specifications as well as construction oversight of projects within the jurisdiction of DSA, which includes State of California public schools (K-12), community colleges and state-owned or state-leased essential services buildings. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

This IR is subject to revision at any time. Please check DSA's website for currently effective IRs. Only IRs listed on the webpage at www.dgs.ca.gov/dsa/publications at the time of project application submittal to DSA are considered applicable.