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# USE OF CONSTRUCTION DOCUMENTS PREPARED BY OTHER DESIGN PROFESSIONALS

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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 of the design professional in general responsible charge (DPGRC) when portions of the design are delegated on projects under the jurisdiction of DSA. The IR similarly clarifies requirements of the delegated structural engineer of record (SEoR) when a portion of a building's structural design is further delegated to a specialty engineer, whether included in the primary construction documents or submitted as a deferred design.

## SCOPE

This IR is applicable to projects in which the DPGRC, required by California Administrative Code (CAC) Section 4-316(a), delegates a portion of the design as permitted by CAC Section 4-316(b). Additionally, the IR applies when a portion of the design is deferred in accordance with CAC Section 4-317(g). See the Glossary below for definitions of terms used in this IR.

## BACKGROUND

CAC Section 4-316(a) requires a primary design professional, referred to in this IR as the DPGRC, have overall responsibility for each project under DSA jurisdiction. With few exceptions, the DPGRC must be an architect or structural engineer licensed in California. CAC Sections 4-316(b) and 4-317(g) also permit the DPGRC to utilize and rely upon construction documents prepared by other licensed and appropriately qualified design professionals.

Business and Professions Code (BPC) Sections 5536.1 and 6735 generally require that architects and civil engineers, respectively, stamp and sign the drawings (plans), specifications, reports, calculations, or other instruments of service they prepare. For projects under DSA jurisdiction, CAC Section 4-317(h) requires drawings (plans) and specifications be stamped and signed by the licensed architect or professional engineer and the DPGRC. In lieu of DPGRC stamp and signature, CAC Section 4-317(h) permits the DPGRC to provide a statement of general conformance concerning the documents prepared by others.

## 1. GENERAL

In accordance with CAC Sections 4-316 and 4-317, the DPGRC may delegate portions of the design and utilize construction documents prepared by others when the DPGRC also stamps and signs each drawing sheet and the specification cover page. Alternatively, the DPGRC may use the statement of general conformance (SoGC) in lieu of stamping and signing documents prepared by others.

### 1.1 Limitations and Conditions

**1.1.1** DSA will make the final determination of the acceptable use of the SoGC.

**1.1.2** Examples of acceptable SoGC are shown in Appendices A and B below.

**1.1.3** In accordance with CAC Section 4-316(b), the SoGC "shall not be construed as relieving the architect or the structural engineer in general responsible charge of his or her rights, duties,



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## USE OF CONSTRUCTION DOCUMENTS PREPARED BY OTHER DESIGN PROFESSIONALS

and responsibilities under Sections 17302 and 81138 of the Education Code and Sections 4-336, 4-341 and 4-344 of these regulations.”

**1.1.4** Registered professional engineers or licensed specialists who perform the engineering designs and prepare the construction documents that are used by the DPGRC, must be competent in the subject area delegated to them in accordance with California Code of Regulations, Title 16: Professional and Vocational Regulations, Division 5, Section 415.

### 1.2 Documents Prepared by Out-of-State Design Professionals

Only documents signed and stamped by architects or registered professional engineers licensed in California are acceptable to DSA.

## 2. COMMON APPLICATIONS

This section describes common cases in which the DPGRC or the SEoR utilizes construction documents prepared by other design professionals.

### 2.1 Construction Documents Prepared by Delegated Design Consultants

In the preparation of the basic construction documents for a project, the DPGRC will commonly retain the services of other consultant design professionals with focused areas of expertise. These design professionals are corporately referred to as the design team and often include a civil engineer, structural engineer, mechanical engineer, electrical engineer, plumbing engineer, landscape architect, etc. Some of these design professionals with delegated scope are listed on Line 24 of the form *DSA 1: Application for Approval of Plans and Specifications*.

**2.1.1** Each drawing sheet prepared by consultant design professionals delegated a portion of the work shall be stamped and signed by the delegated design professional.

**2.1.2** Each drawing sheet prepared by consultant design professionals delegated a portion of the work shall also be stamped (i.e., over-stamped) and signed by the DPGRC unless a signed SoGC is provided.

**2.1.3** When used in lieu of over-stamping per Section 2.1.2 above, the SoGC should be located on the first sheet of the construction drawings or adjacent to the sheet index. The DPGRC must annotate the check boxes on the SoGC shown in Appendix A below to identify all sheets to which it applies. The DPGRC shall sign and date the SoGC.

**2.1.4** Observation and verified reporting of the construction as set forth in CAC Sections 4-333(a), 4-341(b), and 4-341(f) is the responsibility of the DPGRC and those consultant design professionals listed on the form DSA 1 or a form *DSA 1-DEL: Delegation of Responsibility*.

**2.1.5** Addenda, construction change documents (CCD), and revisions are post-approval documents that modify the original DSA-approved construction documents. As such, this section applies to documents prepared by others that are submitted as addenda, CCD, or revisions. However, all post approval documents are submitted with a form *DSA 140: Application for Submittal of Post-Approval Document*, and Part 5 thereof includes a SoGC. Provided that Part 5 of the form DSA 140 is signed by the DPGRC, addenda, CCD, and revisions do not require a separate SoGC applied to the post-approval construction documents.

### 2.2 Pre-Check (PC) Approved Construction Documents

Site specific project applications regularly utilize DSA approved pre-check (PC) designs by incorporation of their construction documents. See *Procedure (PR) 07-01: Pre-Check (PC) Approval* for additional information on PC designs.

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## USE OF CONSTRUCTION DOCUMENTS PREPARED BY OTHER DESIGN PROFESSIONALS

**2.2.1** Approved PC drawings bear the stamp and signature of the design professional(s) responsible for their design and the DSA identification stamp signifying the site-neutral PC approval. The design professionals responsible for the PC design need not be listed on the form DSA 1 nor a form DSA 1-DEL for the site-specific project.

**2.2.2** The DPGRC shall include a signed SoGC for the PC drawings on the construction documents of a site-specific project.

**2.2.3** The SoGC should be located on the first sheet of the site-specific construction drawings or adjacent to the sheet index. The DPGRC must annotate the check boxes on the SoGC shown in Appendix A below to identify the PC application number(s) to which it applies. The DPGRC shall sign and date the SoGC.

**2.2.4** Observation and verified reporting of the on-site construction as set forth in CAC Sections 4-333(a), 4-341(b), and 4-341(f) for the scope of the PC design is the responsibility of the DPGRC, except for the first site installation as described in Section 2.2.5 below.

**2.2.5** New construction (i.e., in-plant manufacturing) and the first site installation of modular or relocatable buildings requires the design professional responsible for the design to be listed on form *DSA 1-MR: Application for New Manufactured Permanent Modular or Relocatable Buildings*. The listed design professional shall perform or delegate observation of the in-plant manufacturing and first site installation in accordance with the form DSA 1-MR. Refer to *Bulletin (BU) 16-01: Delegation of Authority for Modular and Relocatable Buildings: Frequently Asked Questions* for additional information.

### 2.3 Deferred Submittal

In accordance with CAC Section 4-317(g), DSA permits the submission and approval of certain portions of the design to be deferred until the construction phase of the project.

**2.3.1** Deferred submittal drawings are prepared by the California licensed architect or registered engineer responsible for the design of its scope (i.e., the design professional of the deferred submittal). Each drawing sheet shall be stamped and signed by the design professional of the deferred submittal. This architect or engineer is typically retained by the manufacturer or supplier of the deferred portion of the work and need not be listed on the form DSA 1 nor a form DSA 1-DEL.

**2.3.2** The DPGRC is responsible for submitting the deferred submittal to DSA and shall provide a signed SoGC for the deferred submittal drawings. However, all deferred submittals are submitted with a form DSA 140, and Part 5 thereof includes a SoGC. Provided that Part 5 of the form DSA 140 is signed by the DPGRC, the deferred submittal does not require a separate SoGC for the DPGRC applied to the drawings. In the rare case that the DPGRC has exercised “responsible charge” per BPC Section 6703 of the deferred submittal design and document preparation, the DPGRC may over-stamp and sign the deferred submittal drawings in lieu of providing a SoGC.

**2.3.3** Most deferred submittals will only require the SoGC as described in Section 2.3.2 above. The deferred submittal types listed below require a SoGC from the SEoR in addition to that provided by the DPGRC. The SoGC shown in Appendix B below must be applied to the first sheet of the deferred submittal drawings, and its check boxes annotated to designate its applicability to the deferred submittal. The SEoR shall sign and date the SoGC. This requirement applies to the following deferred submittal types:

**2.3.3.1** Steel open web joists and joist girders. Refer to *IR 22-3: Open-Web Steel Joists and Joist Girders* and note that the “Signature Block” referred to therein is no longer used.

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## USE OF CONSTRUCTION DOCUMENTS PREPARED BY OTHER DESIGN PROFESSIONALS

**2.3.3.2** Wood trusses. Refer to *IR 23-4: Metal-Plate-Connected Wood Trusses* or *23-8: Manufactured Wood-Chord-Metal-Web Trusses* as applicable and note that the “Signature Block” referred to therein is no longer used.

**2.3.4** During construction, the scope of the deferred submittal will typically fall under the observation and reporting responsibility of the DPGRC (and the SEoR for the cases listed in Section 2.3.3 above). If observation and reporting responsibilities will be assumed by the design professional of the deferred submittal design, that design professional must be listed on a form DSA 1-DEL (which must clearly define the assumed duties) and shall submit a form *DSA 6-A/E: Architect/Engineer Verified Report*.

### 2.4 Delegated Design of Structural Components

In some cases, DSA will permit the design of specialty components of a building’s primary structural system to be performed by a delegated structural engineer (i.e., the structural engineer of the structural component) other than the SEoR. Examples of structural components for which this delegated engineering approach has been permitted include buckling restrained braces (see *IR 22-4: Buckling-Restrained Brace Frames* for additional information) and externally bonded fiber-reinforced polymer for concrete strengthening. Acceptable stamping and signing options are described in Sections 2.4.2 through 2.4.4 below. These options are summarized in Table 2.4.

**2.4.1** Each drawing sheet prepared by the structural engineer of the structural component (SEoSC) shall be stamped and signed by the SEoSC in all cases.

**2.4.2** Option A: Over-stamped Drawings. If the SEoR stamps and signs those drawings prepared by the SEoSC, the SEoR assumes responsibility for this portion of the work; no further documentation is required to delineate responsibility.

**2.4.3** Option B: Delegated Design. If the SEoR does not over-stamp the drawings prepared by the SEoSC as described in Section 2.4.2 above, the design responsibility may be delegated as follows:

**2.4.3.1** The first sheet of the drawings prepared by the SEoR shall include a SoGC as shown in Appendix B below. The SEoR must annotate the check boxes of the SoGC to list the sheet numbers of those drawings prepared by the SEoSC. The SEoR shall sign and date the SoGC.

**2.4.3.2** During construction, the structural component whose design is delegated to the SEoSC will fall under the scope of structural observation provided by the SEoR and shall be included on the form DSA 6-A/E signed and submitted by the SEoR.

**2.4.4** Option C: Delegated Design and Observation. If the SEoSC assumes design and structural observation responsibility the methodology described here can be used. In some cases, the geographical location of the SEoSC may preclude the practicality of this option. For this reason, if the design team proposes option C, DSA may require, as part of the plan review process, correspondence from the SEoSC confirming understanding of their responsibility to visit the construction site per Section 2.4.4.2 below.

**2.4.4.1** The design team shall submit a form DSA 1-DEL for the SEoSC defining the scope of work for which the SEoSC is responsible. The form DSA 1-DEL shall be signed by the SEoSC and the DPGRC.

**2.4.4.2** During construction, the SEoSC will visit the construction site to provide structural observation of the installation of the delegated structural component(s) in accordance with CAC Section 4-333(a) and California Building Code (CBC) Section 1704A.6 as described on the form DSA 1-DEL. The SEoR is responsible for structural observation of the remainder of the work.

## USE OF CONSTRUCTION DOCUMENTS PREPARED BY OTHER DESIGN PROFESSIONALS

**2.4.4.3** Upon completion of the scope of work described on the form DSA 1-DEL, the SEoSC shall submit to DSA a signed form DSA 6-A/E. Certification of the project will be withheld if the signed form DSA 6-A/E is not received by DSA. The remainder of the structural work will be covered by the form DSA 6-A/E signed and submitted by the SEoR.

Option	Applicable Section Above	Stamp and Signature: Component Drawings	SoGC on SEoR Drawing	Structural Observation Performed By	Form DSA 1-DEL Required	Form DSA 6-A/E Completed By
A Over-stamp Drawings	2.4.2	SEoSC SEoR	No	SEoR	No	SEoR
B Delegated Design	2.4.3	SEoSC	Yes	SEoR	No	SEoR
C Delegated Design and Observation	2.4.4	SEoSC	No	SEoR SEoSC	Yes	SEoR SEoSC

### 3. CHANGES TO CONSTRUCTION DOCUMENTS

If the DPGRC makes a change to construction documents prepared, stamped, and signed by other design professionals (including PC drawings), the method of either Section 3.1 or 3.2 below may be used. The changes are subject to the approval of DSA.

**3.1** The signature and stamp of the original design professional appears on the change and the DPGRC provides a SoGC. In the case of post-approval documents, Part 5 of the form DSA 140 serves as the SoGC per Section 2.1.5 above. If the change is to a previously approved document, the original design professional must restamp and resign the altered document.

**3.2** The DPGRC stamps and signs all changes and assumes responsibility for the changed portion in accordance with CAC Section 4-316(c). If the changes significantly affect the safety of the entire building or structure, the DPGRC shall assume responsibility for the entire design.

#### REFERENCES:

California Business and Professions Code (BPC), Sections 5536.1, 6703, 6735.

California Code of Regulations (CCR) Title 16: Professional and Vocational Regulations, Division 5, Section 415.

California Code of Regulations (CCR) Title 24

Part 1: California Administrative Code (CAC), Sections 4-316, 4-317, 4-333, 4-341.

Part 2: California Building Code (CBC), Section 1704A.6.

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](http://www.dgs.ca.gov/dsa/publications) at the time of project application submittal to DSA are considered applicable.

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### ABBREVIATIONS

DPGRC – Design Professional in General Responsible Charge

SEoR – Structural Engineer of Record

SEoSC – Structural Engineer of Structural Component

SoGC – Statement of General Conformance

### GLOSSARY

#### Design Professional in General Responsible Charge

California licensed architect or registered structural engineer responsible for the design and construction observation of a project under DSA jurisdiction as set forth in CAC Section 4-316(a) and with the duties described in CAC Section 4-341. The DPGRC is listed on line 23 of the Form DSA 1.

#### Design Professional of Deferred Submittal

California licensed architect or registered engineer responsible for a defined portion of the design that is deferred to the construction phase of a project under DSA jurisdiction as set forth in CAC Section 4-317(g).

#### Drawings

Portion of the construction documents (as defined in CBC Section 202) that communicates project requirements predominantly through “graphic and pictorial” representations, which are commonly presented on architectural sheet sizes (e.g., ARCH B, C, D, E1, or E) and include plans, sections, elevations, and details. This term is synonymous with “PLANS” as defined in CAC Section 4-314 and used in CAC Sections 4-301 through 4-352. It also corresponds to the file described in *Procedure (PR) 18-04: Electronic Plan Review for Design Professionals Section 1.3* and parts of post approval documents per PR 18-04 Section 5.2.2.4.

#### Statement of General Conformance

Notation on the construction documents signed by the DPGRC (or SEoR) that facilitates the use of construction documents prepared, stamped, and signed by other design professionals, in lieu of the DPGRC stamping and signing the construction drawings as provided for in CAC Section 4-317(h).

#### Structural Engineer of Record

California registered structural engineer delegated responsibility for the design and construction observation of the structural systems on a project under DSA jurisdiction as set forth in CAC Section 4-316(b) and with the duties described in CAC Section 4-341. The SEoR is listed on line 24a of the form DSA 1.

#### Structural Engineer of Structural Component

California registered structural engineer delegated responsibility for a defined structural component or set of components that is incorporated into the primary construction documents (i.e., not deferred) on a project under DSA jurisdiction.

# USE OF CONSTRUCTION DOCUMENTS PREPARED BY OTHER DESIGN PROFESSIONALS

## APPENDIX A: EXAMPLE STATEMENT OF GENERAL CONFORMANCE FOR DPGRC

### STATEMENT OF GENERAL CONFORMANCE

Application No.: \_\_\_\_\_

File No.: \_\_\_\_\_



The drawings identified as follows:

- All drawing sheets included in this set not bearing my stamp and signature.
- Drawing sheets denoted in the sheet index as follows: \_\_\_\_\_
- Drawing sheets included under the following PC approval(s): \_\_\_\_\_

have been prepared by other design professionals or consultants who are licensed and authorized to prepare such drawings (plans) in this state. They have been examined by me for:

- 1) Design intent and appear to meet the appropriate requirements of Title 24, California Code of Regulations and the project specifications prepared by me, and
- 2) Coordination with my drawings (plans) and specifications and are acceptable for incorporation into the construction of this project.

Per Title 24, Part 1, Section 4-316(b): This Statement of General Conformance shall not be construed as relieving me of my rights, duties, and responsibilities under Sections 17302 and 81138 of the Education Code and Sections 4-336, 4-341 and 4-344 of Title 24, Part 1.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
License Number

\_\_\_\_\_  
Expiration Date

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**USE OF CONSTRUCTION DOCUMENTS PREPARED BY OTHER DESIGN PROFESSIONALS**

**APPENDIX B: EXAMPLE STATEMENT OF GENERAL CONFORMANCE FOR SEOR**

**STATEMENT OF GENERAL CONFORMANCE**

Application No.: \_\_\_\_\_

File No.: \_\_\_\_\_

The drawings identified as follows:

- This deferred submittal drawing set (inclusive of all sheets).
- Delegated structural component drawing sheets listed here: \_\_\_\_\_.

have been prepared by other design professionals who are licensed and authorized to prepare such drawings (plans) in this state. They have been examined by me for:

- 1) Design intent and appear to meet the appropriate requirements of Title 24, California Code of Regulations and the project specifications prepared by me, and
- 2) Coordination with my drawings (plans) and specifications and are acceptable for incorporation into the construction of this project.

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Signature

Date

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Printed Name (Structural Engineer of Record)

License Number