
CONSTRUCTION CHANGE DOCUMENT

Disciplines: All

History: Revised 10/05/26

Last Revised 11/27/18

Original Issue 09/01/99

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 Regulation (IR) clarifies requirements relating to construction changes on projects under DSA's jurisdiction that must be submitted to DSA, and defines the construction change document process.

1. SUBMITTAL REQUIREMENTS FOR CONSTRUCTION CHANGES

After a contract for the work has been let, changes to the approved construction documents that affect the Structural Safety, Access Compliance or Fire and Life Safety portions of the project, including the removal of scope of work, shall be made by means of a Construction Change Document (CCD), per California Administrative Code Section 4-338(c).

It is the responsibility of the design professional in general responsible charge to determine if changes affect the Structural Safety, Access Compliance or Fire and Life Safety portions of the project. Such determinations may be subject to concurrence by DSA. (See Section 4.2 below about the statement on the verified report.)

The design professional in general responsible charge shall prepare the CCD and is responsible for code and process compliance.

The following define requirements for submittal of a CCD to DSA.

1.1 Changes to or affecting the Structural Safety, Access Compliance or Fire and Life Safety portions of the project:

- These changes shall be submitted as a CCD and are required to be submitted to and approved by DSA prior to commencement of the affected work. Failure to obtain DSA approval prior to commencing the affected work may result in a stop work order per *IR A-13: Stop Work and Order to Comply*.
- A CCD must be submitted to DSA using form *DSA 140: Application for Submittal of Post-Approval Document*, available on the DSA forms webpage. Submittal process requirements are defined in Section 2 below and must be followed.

1.2 Changes **NOT** affecting the Structural Safety, Access Compliance or Fire and Life Safety portions of the project:

- These changes are not subject to DSA review and need not be submitted to DSA. At DSA's sole discretion, if CCD's are submitted that contain only such changes, they may be canceled.
- Such changes shall be documented and communicated using documentation method deemed appropriate by the Design Professional in General Responsible Charge. These documents are intended solely to support effective communication and coordination among the design, construction, and inspection teams.

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1.3 Change Orders

Change Orders are not required to be submitted to DSA. The CCD process replaces the need to submit Change Orders.

Changes to the construction cost are reported to DSA using *form DSA 168: Statement of Final Actual Project Cost* at the conclusion of the project, or as instructed in Section 4.3 of *IR EB-4: Rehabilitation Required by Cost*.

2. SUBMITTAL PROCESS

Submittal of CCDs must conform to the following requirements:

2.1 The CCD must be submitted by the design professional in general responsible charge.

2.2 Each CCD must be submitted to DSA using a separate form DSA 140.

2.3 The DSA 140 form must be filled out completely, including the CCD number, with no sections left blank.

2.4 Each CCD must be uniquely numbered, using a 3-digit number in compliance with *PR 18-04: Electronic Plan Review for Design Professionals of Records Using Bluebeam*. If the submitted CCD is returned by DSA not approved, the CCD number used in the original submittal must remain the same for any subsequent re-submittals.

2.5 Document preparation for CCD submittals, including stamping and signing requirements, shall be in accordance with PR 18-04 Section 5.2.

2.6 Each page in both the approval document file and the supporting document file of the CCD shall be clearly and uniquely numbered.

2.7 Changes to any testing or special inspection requirements associated with the proposed change must be clearly described with a revised form *DSA 103: List of Required Structural Tests and Special Inspections*, which shall be included in the CCD.

2.8 When drawings containing DSA approval stamps are revised and reissued as part of the CCD, all of the following requirements must be met:

- DSA identification and approval stamps must be removed from the drawing (or crossed out) prior to making any changes to the drawings.
- Each change shall be clouded and identified on the drawing.
- All drawings must be re-stamped and re-signed by the responsible design professional. The date of signing shall be provided.

2.9 Bluebeam Studio shall be utilized for CCD submittals. See DSA PR 18-04 for submittal procedures.

3. REVIEW AND APPROVAL BY DSA

DSA may charge fees in accordance with *IR A-30: DSA Hourly Fee Services* for all CCDs submitted to DSA for approval.

3.1 DSA reviews CCD for minimum compliance with the codes regulating the Structural Safety, Access Compliance and Fire and Life Safety portions of the project.

3.2 If not approved by DSA, then the CCD is returned to the design professional in general responsible charge for corrections. DSA will return the document for corrections, and the form DSA 140 will indicate the status of the review. After corrections are made then the CCD is resubmitted following the submittal process outlined in Section 2 above.

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3.3 If approved by DSA, then DSA places the approved CCD in DSAbbox as described in DSAbbox External Library, Module 2.13 (see Section 4.1 below for requirements for distribution by the design professional in general responsible charge).

4. DUTIES OF DESIGN PROFESSIONAL IN GENERAL RESPONSIBLE CHARGE**4.1 Distribution of CCD Documents**

The design professional in general responsible charge shall provide the contractor and project inspector (PI) with DSA-approved CCD prior to commencement of work shown thereon.

4.2 Statement in Final Verified Report

The final verified report, form *DSA 6-AE: Architect/Engineer Verified Report*, from the design professional in general responsible charge must include a statement that all changes to or affecting the Structural Safety, Access Compliance or Fire and Life Safety portions of the project have been approved by DSA. The intent for all projects is that this final verified report be dated after the approval of all CCDs.

5. DUTIES OF THE PROJECT INSPECTOR WITH RESPECT TO CCDs

The PI shall follow the CCD record-keeping and monitoring requirements, issuing deviation notices when appropriate, as specified in *IR A-8: Project Inspector and Assistant Inspector Duties and Performance*.

In addition, the PI shall maintain a separate log of documentation issued by the Design Professional for changes that do not affect Structural Safety, Access Compliance or Fire and Life Safety requirements. The log shall be made available for review upon request by DSA during site visits.

6. MONITORING OF CHANGES BY DSA

If DSA determines that changes to the plans or specifications appear to require DSA approval (changes affecting the Structural Safety, Access Compliance or Fire and Life Safety portions of the project), DSA shall notify the design professional in responsible charge and require that the changes be submitted for review and approval by DSA or require evidence that the changes are not related to Structural Safety, Access Compliance or Fire and Life Safety. DSA will perform periodic review of these changes during site visits.

REFERENCES:

California Code of Regulations (CCR) Title 24

Part 1: California Administrative Code (CAC), Sections 4-215, 4-233, 4-314, 4-317, 4-323, 4-338 and 4-341

California Health and Safety Code, Sections 16011, 16013 and 16015

California Education Code, Sections 17280 and 81130

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.