# CONSTRUCTION CHANGE DOCUMENT SUBMITTAL AND APPROVAL PROCESS

**Disciplines:** All  
**History:**  
- Revised 11/27/18  
- Revised 12/16/16  
- Revised 07/08/14  
- Revised 02/14/14  
- Revised 11/21/12  
- Revised in its entirety 11/01/12  
- Revised 11/16/09  
- Revised 09/18/07  
- Revised 09/16/06  
- Revised 07/08/14  
- Revised 11/16/09  
- Revised 02/15/12  
- Issued 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) provides clarification of specific Code requirements relating to construction changes that must be submitted to DSA and defines the construction change document process.

**DEFINITIONS:** The following definitions apply to terms used in this document:

- **Approved Construction Documents** – The Structural, Access or Fire & Life Safety related portions of the plans, specifications, addenda, deferred approvals, revisions, and construction change documents duly approved by DSA.

- **Change** – Revisions, deletions, additions, and substitutions to approved construction documents.

- **Change Order** – A document defining construction changes that result in changes to the contract.

- **Clarification** – A statement from the architect or engineer in general responsible charge of the project that clarifies (but does not change) the requirements of the approved construction documents.

- **Contract** – A written agreement for construction, alteration, repair or other construction activities associated with facilities regulated by DSA.

- **Construction Change** – Changes to the approved construction documents after a contract for the work has been awarded.

- **Construction Change Document (CCD)** – The documentation of construction changes.

- **Design Professional in General Responsible Charge** – The architect or engineer in general responsible charge of the project as listed on Line 23 of form DSA 1: Application for Approval of Plans and Specifications.

- **Drawing** – An illustration on paper or electronic medium.

- **Field Change Document (FCD)** – A document defining construction changes but, unlike change orders, does not require approval of the school board nor an accounting of construction cost changes.

- **Interpretation** – A statement from the architect or engineer in general responsible charge of the project that interprets (but does not change) the requirements of the approved construction documents.

- **Responsible Design Professional** – The architect or engineer in general responsible charge of the project, as listed on Line 23 of form DSA 1, or architects or engineers with delegated responsibility for portions of the project as listed on Line 24a-24d or 25 of form DSA 1.
1. **SUBMITTAL REQUIREMENTS FOR CONSTRUCTION CHANGES:** After a contract for the work has been let, changes to the approved construction documents shall be made by means of a CCD.

It is the responsibility of the design professional in general responsible charge to determine if changes affect the Structural, Access or Fire & Life Safety portions of the project. (See Section 4 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, Access Compliance or Fire & Life Safety portions of the project:**

   - These changes shall be classified as **CCD Category A**.
   - A CCD Category A is required to be submitted to and approved by DSA prior to commencement of the affected work.
   - A CCD Category A must be submitted to DSA using form **DSA 140: Application for Approval of Construction Change Document - CCD Category A/B** depicted in Appendix A of this IR and available on the DSA forms page. Submittal process requirements are defined in Section 2 of this IR and must be followed.

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

   - These changes shall be classified as **CCD Category B**.
   - CCD Category B are not required to be submitted to DSA unless specifically required, in writing, by DSA. However, a design professional, at their discretion, may choose to submit a CCD Category B. (Refer to Section 3 for fees charged.)
   - If DSA requires any CCD Category B to be submitted, then they shall be submitted to DSA, similar to CCD A, using form DSA 140.
   - If DSA requires a CCD Category B to be submitted, then DSA will review for concurrence that it does not contain changes to or affect the Structural, Access or Fire & Life Safety portions of the project. If necessary, and at its sole discretion, DSA will reassign the CCD to Category A.
   - If DSA concurs the document is a category B document, an approval stamp will be applied to the document.

1.3 **Change Orders:** Change Orders are not required to be submitted to DSA. The CCD process replaces the need to submit Change Orders (except as noted in Section 7).

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.

2. **SUBMITTAL PROCESS:** Submittal of CCDs must conform to the following requirements:

2.1 Must be submitted by the design professional in general responsible charge.

2.2 Must be submitted to DSA using form DSA 140.

2.3 Each CCD submittal must use a separate DSA CCD form.

2.4 The DSA CCD form must be filled out completely, including identification of the CCD
Category A or B, leaving no fields blank. For Category B CCDs, indicate whether the submission is voluntary or DSA required. When DSA provides written direction compelling submission of a CCD Category B, attach a copy of the DSA written notification compelling submission.

2.5 Each CCD must be uniquely numbered. The numbering may be numeric or alphanumeric.

- 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.
- If a submitted CCD Category B is returned by DSA not approved, the CCD number used in the original submittal must remain the same when re-submitting as a CCD Category A.

2.6 Proposed changes must be described clearly and completely.

2.8 All drawings, and, when applicable, the first page or index of specifications and calculations associated with the proposed change must be stamped, signed, and indicate date of signing by the responsible design professional as an attachment to form DSA 140.

2.9 Reference to the specific portions of the drawings or specifications that are being changed must be included.

2.10 Changes to any testing or inspection requirements associated with the proposed change must be clearly described with a revised form DSA 103: List of Structural Tests and Special Inspections.

2.11 Each page in the CCD, including the pages in each attachment, shall be clearly and uniquely numbered. All drawings attached to describe the changes shall be clearly numbered, labeled, and referenced.

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

- Images of all DSA 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.

2.13 CCD Submittal to DSA

2.13.A Projects submitted to DSA prior to October 1, 2018: DSA Box or Bluebeam studio may be utilized for CCD submittals as directed by the DSA Regional Office. If DSAbox is utilized for CCD submittals, each CCD shall be submitted as a single document and include form DSA 140 as the first page. In some cases, large size drawings associated with CCDs may need to be submitted as a hard copy to the appropriate DSA regional office. The design professional should contact the DSA regional office to determine file size limitations and submittal guidelines, and review DSAbox instructions in the DSAbox External Library, Module 2.13. If Bluebeam studio is utilized for CCD submittals, see DSA PR18-04: Electronic Plan Review for Design Professionals of Record for submittal procedures.

2.13.B Projects submitted to DSA on or after October 1, 2018: Bluebeam Studio will be utilized for CCD submittals. See DSA PR18-04 for submittal procedures.
3. REVIEW AND APPROVAL/CONCURRENCE BY DSA:

- DSA will charge fees in accordance with IR A-30 for all Category A CCDs submitted to DSA for approval. Category B CCDs voluntarily submitted by the design professional to DSA will be charged fees for review and concurrence. Category B CCDs required by a DSA representative to be submitted will not cause charged fees if DSA concurs the CCD is Category B.

3.1 CCD Category A:

- DSA reviews CCD Category A for minimum compliance with the codes regulating the Structural, Access and Fire & Life Safety portions of the project.

- 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 with a form DSA 140 attached indicating the status of the review and update eTracker accordingly. After corrections are made then the CCD is re-submitted (must include the DSA comments and a copy of the form DSA 140 from the previous unapproved submittal) following the submittal process outlined in Section 2 of this IR.

- If approved by DSA, then DSA places the approved CCD in DSAbox as described in DSAbox External Library, Module 2.13 (see Section 4 for requirements for distribution by the design professional in general responsible charge).

3.2 CCD Category B:

- DSA reviews CCD Category B to provide concurrence that the changes do not affect the Structural, Access or Fire & Life Safety portions of the project.

- DSA approval of CCD Category B is not approval for code compliance, but is concurrence that the documents do not change the Structural, Access and/or Fire & Life Safety portions of the project.

- If not approved by DSA, then the CCD is returned to the design professional in general responsible charge for corrections. After corrections are made, then the CCD is re-submitted using CCD Category A form DSA 140 (must include the DSA comments and a copy of the form DSA 140 from the previous unapproved submittal) following the submittal process outlined in Section 2 of this IR. The remaining review process will follow that for CCD Category A described in Section 3.1 of this IR.

- If approved by DSA, then DSA places the approved CCD in DSAbox as described in DSAbox External Library, Module 2.13 (see Section 4 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 Category A Documents: The design professional in general responsible charge shall provide the contractor and project inspector with DSA approved CCD Category A prior to commencement of work shown thereon.

4.2 CCD Category A Statement in Final Verified Report: The final verified report (form DSA 6-AE) 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 & 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 those CCDs.
5. **DUTIES OF THE PROJECT INSPECTOR WITH RESPECT TO CCDs:** The project inspector shall follow the CCD Category A record-keeping and monitoring requirements, issuing deviation notices when appropriate, as specified in IR A-8: Project Inspector and Assistant Inspector Duties and Performance.

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 & Life Safety portions of the project), DSA shall notify the design professional in responsible charge and require the changes to be submitted for review and approval by DSA or require evidence the changes are CCD Category B.

7. **TRANSITION:** The following provides direction for submittal of construction change documents (Change Orders, (Field Change Document) FCDs or CCDs) for projects in various stages of completion of construction. All projects for which construction commences on or after January 2, 2013 are required to use the CCD process described in this IR.

7.1 **Projects for which, prior to November 1, 2012, construction is essentially complete, having been issued a DSA 90-day letter or “closed uncertified” by DSA:** Projects in this category may have an issue of “unresolved change orders” or “unresolved FCDs.” The status of these could be:

- Change orders or FCDs have been submitted to DSA and are pending review or unapproved.
- Change orders or FCDs have not been submitted to DSA.

To resolve this issue, use the following options:

**Change Orders:**

- **Option #1:** Submit/resubmit the change orders and obtain DSA approval. The cost information in the change order need not be included.

- **Option #2:** If any or all of the “unresolved change orders” are changes that do not affect the Structural Safety, Access Compliance, or Fire & Life Safety components or portions of the project, then, in lieu of the change orders, form DSA 310: Alternate Certification Statement of Content for Change Orders, Addenda and Revisions may be submitted. The specific change orders must be listed, by number, on the form.

**FCDs:**

- **Option #1:** If the FCD has been previously submitted to DSA, then resubmit the FCD and obtain DSA approval.

- **Option #2:** For changes that affect the Structural Safety, Access Compliance, or Fire & Life Safety portions of the project, but have not resulted in a change order, and have not been previously submitted as an FCD, then submit as a CCD Type A.

7.2 **Projects for which construction commenced prior to January 2, 2013 and do not fall into the category defined in Section 7.1:**

- For change orders or FCDs that have been submitted to DSA, see options listed in section 7.1.

- From November 1, 2012 to January 1, 2013: If previously unsubmitted change orders or FCDs are submitted, DSA staff will assign them as CCD Category A, assign the change order/FCD number as the CCD number, and process them accordingly.
On or after January 2, 2013: the CCD process must be followed for all new, previously unsubmitted construction changes. If previously unsubmitted change orders or FCDs are submitted, DSA staff will return them as rejected, not approved and require them to be resubmitted as CCD.

REFERENCES:
California Code of Regulations (CCR) Title 24
  Part1: California Administrative Code, Sections 4-215, 4-233, 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.
Appendix A - Sample CCD Category A

*APPLICATION FOR APPROVAL OF CONSTRUCTION CHANGE DOCUMENT – CCD CATEGORY A/B*

This application is for construction changes, as defined in IR A-6, to approved contract documents. This form shall be completed by the Design Professional in General Responsible Charge of the project, in accordance with California Code of Regulations, Title 24, Part 1, Section 4.338 (c) and in compliance with DSA IR A-6.

<table>
<thead>
<tr>
<th>School District/Owner: Amazing Unified School District</th>
<th>DSA File #: 37</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Name/School: Best School</td>
<td>DSA App #: 04 - 119119</td>
</tr>
</tbody>
</table>

**APPLICANT**

<table>
<thead>
<tr>
<th>CCD Cat: ☐ A, ☑ B, #: 04</th>
<th>Date Submitted: 5-5-16</th>
<th>Attached Pages: ☐ No ☑ Yes (2 pages)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Firm Name: ABC Architects</td>
<td>Contact Name: Pat Smith</td>
<td></td>
</tr>
<tr>
<td>Email: <a href="mailto:Pat@abc.com">Pat@abc.com</a></td>
<td>Phone Number: (888)555-1111</td>
<td></td>
</tr>
<tr>
<td>Address: 1444 Arch Drive</td>
<td>City: San Diego</td>
<td></td>
</tr>
<tr>
<td>State: CA</td>
<td>Zip: 92127</td>
<td></td>
</tr>
</tbody>
</table>

☐ A DSA 301-N, DSA 301-P, or 90-Day Letter has been issued for this project.

☒ For project currently under construction

☐ To obtain DSA approval of existing uncertified building(s).

**DESIGN PROFESSIONAL IN GENERAL RESPONSIBLE CHARGE**

Name of Design Professional in General Responsible Charge: Robin Hanks

Professional License #: C72475  Discipline: Architect

Design Professional in General Responsible Charge Statement: The attached Construction Change Documents have been examined by me for design intent and appear to meet the appropriate requirements of Title 24, California Code of Regulations and the project specifications. They are acceptable for incorporation into the construction of the project.

Signature: [Signature]

CHECK THIS BOX: ☒ To confirm that all CCD drawings and, when applicable, first sheet or index of calculations and specifications have been stamped and signed by the Responsible Design Professional listed on DSA 1 for this project.

Brief description of construction change (attach additional sheets if needed):
Change bolts to lags on detail 7/85.

List of DSA approved drawings affected by this CCD: Sheet 55, detail 7.

<table>
<thead>
<tr>
<th>DSA USE ONLY</th>
<th>DSA Stamp</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

DSA 140 (rev 05-05-16)  DIVISION OF THE STATE ARCHITECT  DEPARTMENT OF GENERAL SERVICES  STATE OF CALIFORNIA
Appendix A - Sample CCD Category A (continued)

- Double top plate
  - See plans
- Beam

### Schedule

<table>
<thead>
<tr>
<th>Type</th>
<th>Screws</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type A</td>
<td>16-5/8&quot;# Lag</td>
</tr>
<tr>
<td>Type B</td>
<td>24-5/8&quot;# Lag</td>
</tr>
</tbody>
</table>

**Note:**
1. Locate screws at center line of top plate.
2. Split total number of screws each side of splice.
3. For info not shown see [7/5-5]

Alternate to detail [05]

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**Sheet 1 of 1**

- Project Name: BEST SCHOOL
- DSA Application #: 04-1919K
- CCD Number: 05
- Date: 5/5/15
Appendix A - Sample CCD Category A (continued)

PROJECT: NEW SCHOOL
DSA #: 04-119119X
CCD #: 05
DATE: 5/6/15

CHANGE DETAIL: 7/8" from bolts to lag.
FROM: 7/8" 3/4" bolts 2x to 4x
VAL = 1.2K
CHANGE TO: 3/8" lag (1/2" side member)
VAL = 0.92K
- Use 2. 3/8" lag to replace 1. 3/4" bolt
SPACE AD = 4x3x2 = 2.5" -> USE 3 MIN.

FROM 7/8" two types of spacers.
TYPE A: uses 8. 3/4" bolts
REPLACE w/ 12. 3/8" lag.

TYPE B: uses 12. 3/4" bolts
REPLACE w/ 24. 3/8" lag.

[Registered Professional Engineer's Signature]
No. 13487
Appendix B - Sample CCD Category B

APPLICATION FOR APPROVAL OF CONSTRUCTION CHANGE DOCUMENT - CCD CATEGORY A/B

This application is for construction changes, as defined in IR A-6, to approved contract documents. This form shall be completed by the Design Professional in General Responsible Charge of the project, in accordance with California Code of Regulations, Title 24, Part 1, Section 4-338 (c) and in compliance with DSA IR A-6.

School District/Owner: Amazing Unified School District
Project Name/School: Best School

DSA File #: 37
DSA App. #: 04 - 119119

APPLICANT

CCD Cat. □ A / ✔ B, #: 05
Date Submitted: 5-5-16
Attached Pages? □ No ✔ Yes (1 pages)

For CCD Cat. B, this is a [ ] voluntary submittal, □ DSA required submittal (attach DSA notification requiring submission).

Firm Name: ABC Architects
Contact Name: Pat Smith
Email: Pat@abc.com
Phone Number: (888)555-1111
Address: 1444 Arch Drive

City: San Diego
State: CA
Zip: 92127

[ ] A DSA 301-N, DSA 301-P, or 90-Day Letter has been issued for this project.
[ ] For project currently under construction
[ ] To obtain DSA approval of existing uncertified building(s).

DESIGN PROFESSIONAL IN GENERAL RESPONSIBLE CHARGE

Name of Design Professional in General Responsible Charge: Robin Hanks
Professional License #: CT2475
Discipline: Architect

Design Professional in General Responsible Charge Statement: The attached Construction Change Documents have been examined by me for design intent and appear to meet the appropriate requirements of Title 24, California Code of Regulations and the project specifications. They are acceptable for incorporation into the construction of the project.
Signature: 

CHECK THIS BOX: [x] To confirm that all CCD drawings and, when applicable, first sheet or index of calculations and specifications have been stamped and signed by the Responsible Design Professional listed on DSA 1 for this project.

Brief description of construction change (attach additional sheets if needed):
Add painted word “SCHOOL” five feet south of existing “CROSSING” sign, centered on northbound lane of Main St. on west side of school site. Use paint specified for roadway symbols.

List of DSA approved drawings affected by this CCD: Sheet AS1, detail S3.

DSA USE ONLY

For business office use only
Date Sent:
Return By:
Delivery Method:
Remarks:

DSA Stamp

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DEPARTMENT OF GENERAL SERVICES
STATE OF CALIFORNIA

Page 1 of 1
Appendix B - Sample CCD Category B (continued)