

## **POLICY: OVER-THE-COUNTER REVIEW OF PROJECTS USING PRE-CHECK (PC) APPROVED DESIGNS**

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

**PURPOSE:** This policy clarifies the eligibility, limitations, and requirements under which the DSA will accept projects for “over-the-counter” (OTC) review utilizing approved pre-check (PC) designs. This policy also clarifies requirements for OTC review of projects involving the relocation of relocatable buildings. Finally, this policy describes the process for requesting appointments, preparation of submittal documents, and completion of OTC review.

OTC reviews are limited to projects that can be completed in a limited time, face-to-face meeting including project submittal, plan review, and project approval.

**BACKGROUND:** DSA offers OTC project review for eligible projects to expedite the review and approval process. DSA’s OTC process is primarily intended for single-story relocatable buildings, and other simple projects, utilizing designs that have been “pre-approved” in accordance with *PR 07-01: Pre-Check Approval*.

- 1. ELIGIBLE PROJECTS:** To be eligible for OTC review, a project must meet the eligibility requirements of this section, the applicable scope limitations described in Section 2, and the applicable suitability requirements of Section 3 below.
  - 1.1** All drawings must be presented on the same size paper. Book-type specifications are discouraged as they may increase plan review time; DSA prefers that specifications be included on the drawings for OTC projects.
  - 1.2** New construction projects (defined as “Construction of:” on the form *DSA 1: Application for Approval of Plans and Specifications*) are limited to projects involving only simple buildings or structures for which a currently valid DSA PC approval exists. Projects involving configurations of buildings or structures that lead to complexities in structural load path or additional fire and life safety requirements beyond what is covered in the PC may not be considered simple. Examples of eligible structures include single-story relocatable buildings, lunch/shade shelters, carports, solar structures, flag poles, and marquee signs. For structures without PC approval, contact the applicable DSA Regional Office prior to making OTC appointments to determine if they will be eligible for OTC review.
  - 1.3** Relocation projects (defined as “Relocation of:” on the form *DSA 1*) are only permitted for the relocation of buildings for which the original building construction is compliant with project certification requirements of the Field Act.
    - 1.3.1** Evidence of relocatable building compliance can be either DSA’s “Certification of Compliance” letter for the original project wherein the building was constructed, or a final verified report from the in-plant inspector for the original construction of the buildings. See *PL 09-04: 90-Day Letter and Reopening of Files for Project Certification* and *DSA Project Certification Guide* for further information on obtaining certification for existing uncertified buildings. See Appendix A, Section D (OTC Package Checklist) for additional requirements for relocation projects.

---

**OVER-THE-COUNTER REVIEW OF PROJECTS USING PRE-CHECK  
APPROVED DESIGNS**

**1.3.2** See applicable version of *IR 16-1: Design and Construction Requirements for Relocatable Buildings*, Section 5 for further discussion of the requirements for relocating buildings.

**2. OTC PROJECT SCOPE LIMITATIONS:** In addition to the eligibility requirements of Section 1 and suitability requirements of Section 3, each appointment for OTC review will be limited to a single application meeting the requirements of Sections 2.1 through 2.5. Requested exceptions may be granted at the discretion of DSA; the client shall call the respective DSA plan review supervisor to discuss the scope of the project and obtain authorization prior to scheduling OTC appointments.

**2.1** An application shall include construction on only one site.

**2.2** One construction type, as described in California Building Code (CBC) Section 602, for each PC of a single-story building, for which PC design has been approved by DSA. Two-story buildings are not permitted for OTC review. Accessories to buildings, such as ramps and landings, are permitted.

**2.3** If automatic fire sprinkler systems (AFSS) are included in a building, the scope of the project shall be limited as described above and as follows:

**2.3.1** A maximum of a single relocatable structure, on a single site. Projects with up to three relocatable structures on a single site can be reviewed during sequential appointments (one appointment per building) as long as the structures are designed with separate risers without being interconnected.

**2.3.2** PC building AFSSs designed for occupancies other than "light hazard" are prohibited.

**2.3.3** Building use shall be limited to administration, assembly or classroom use without special hazards. Any variation of use which may affect AFSS hydraulic design shall be prohibited. (Prohibited uses include, but are not limited to, stages, science labs, vocational shops, library book-stack areas, and campus kitchens.)

**2.3.4** AFSS drawings intended for general bid shall be signed and stamped by a California registered mechanical engineer, fire protection engineer, licensed architect, or registered structural engineer.

These requirements also apply if the building is subsequently moved to a new location.

**Exception:** Fire sprinkler system drawings may be signed by a California licensed Class C-16 (Fire Protection) contractor when that same contractor will install the system, **including but not limited to the riser for the building to be installed at each specific project site.**

Drawings must include a note, worded as per DSA Procedure PR 07-01, Section 4.2.4.1. This note carries the name of the C-16 licensed contractor and states that California law provides that AFSSs designed by a C-16 licensed contractor must be installed by that contractor.

If a system designed by a C-16 licensed contractor is installed by a different contractor, then the design and the installation is invalid, rendering DSA's approval of the project and any subsequent certification invalid.

If any part of a system (including the riser) will be installed by a different contractor, responsibility for the entire system (including riser) must be accepted by a California

---

**OVER-THE-COUNTER REVIEW OF PROJECTS USING PRE-CHECK APPROVED DESIGNS**

registered mechanical engineer, fire protection engineer, licensed architect, or registered structural engineer who indicates acceptance of responsibility by signing and stamping all AFSS drawings.

Signed stamped drawings must be submitted to DSA and approved prior to proceeding with construction.

**2.3.5** Provide a site-specific Fire Flow letter of certification from an approved water purveyor or Local Fire Authority (LFA). Water supply shall be designed for 110 percent of the PC AFSS design requirements unless justification is submitted to DSA from the local water purveyor or LFA that fire flow data has been tested at system peak usage.

**2.3.6** DSA reserves the right to refuse to review the project over-the-counter if all information required in DSA Guideline *GL-1: Project Submittal Guideline: Automatic Fire Sprinkler Systems* is not provided.

**2.4** When AFSSs are not included, a maximum of four structures per OTC appointment are permitted.

**2.5** Site work is limited to work directly related to the installation/relocation of the structures and to site improvements. Site improvements eligible for exemption from Structural Safety (SS), Fire and Life Safety (FLS) and Access Compliance (ACS) review are listed in Appendix A of *IR A-22: Construction Projects and Items Exempt from DSA Review*.

**3. SITE-SPECIFIC PC BUILDING/STRUCTURE SUITABILITY:** Verify that the site-specific use of PC drawings falls within the design parameters for which the PC was approved. Such parameters include:

**3.1 Structural:**

**Exception to the Following:** When buildings constructed and certified to previous building codes are relocated, the design parameters for the new site listed in Sections 3.1.1 through 3.1.5 shall be within the limits indicated on the original design and based upon the previous CBC under which the building was constructed and certified. If the limits are exceeded, then the building shall be analyzed and rehabilitated as necessary in accordance with current Code for the increased loading per California Administrative Code (CAC) Section 4-309(c) and is not eligible for OTC review. See applicable version of IR 16-1 for further information.

**3.1.1** Floor and roof design loads (including snow loads when applicable).

**3.1.2** Wind Design: Basic Wind Speed (3-second gust, ultimate design wind speed for applicable Risk Category), Wind Exposure Factor, Topographic Factor ( $K_{zt}$ ), etc.

**3.1.3** Seismic Design: Seismic Design Category, Seismic Importance Factor, Site Class,  $S_s$ ,  $S_{DS}$ , etc.

**3.1.4** Soils and Geotechnical: A geotechnical investigation must be conducted in accordance with CBC Section 1803A and reported as required in CBC Section 1803A.7 (see exception in Appendix A, Item C3). The design architect or structural engineer in general responsible charge must verify that the geotechnical report indicates that all soils-related parameters exceed the minimum design requirements identified on the PC documents including but not limited to allowable soil pressures, surcharge, down-drag, and effects due to high water table, etc., as applicable.

---

**OVER-THE-COUNTER REVIEW OF PROJECTS USING PRE-CHECK APPROVED DESIGNS**

**3.1.5** Geohazard Report (Engineering Geologic Report): A geologic hazards investigation must be conducted and reported in accordance with CBC Section 1803A.6 and applicable version of *IR A-4: Geohazard Report Requirements*, including listed exceptions. The design architect or structural engineer in general responsible charge must verify that the geohazard report identifies no site-related geologic hazards which would preclude the use of the proposed PC design at the site, including but not limited to liquefaction potential, landslide, flooding, earthquake faulting, etc.

**3.2 Fire and Life Safety:**

**3.2.1** Fire Hazard Severity Zone per CBC Chapter 7A.

**3.2.2** When AFSSs are included, water pressure and flow rate available at the site, etc.

**3.2.3** Required frontage to justify building area increases, and minimum setbacks.

**3.3 Energy/Climate Zone:** See *PR 18-02: Pre-Check (PC) Permanent Modular or Relocatable Building Designs CALGreen/Energy Code Compliance Review*. PC buildings must be sited within the climate zone(s) as indicated on PC cover sheet per PR 18-02, Section 2.2. Note that where PC buildings are approved for climate zones 14, 15, and 16, the PC may be sited in any California location.

**4. SITE-SPECIFIC REQUIREMENTS:** Construction documents shall include site-specific plans and details as well as the relevant PC drawings.

**4.1** Options and variations are often described in the PC documents. The specific options and variations chosen for the project must be clearly defined.

**4.2** PC sheet index shall be modified to show only those sheets that are part of the submittal.

**4.3** Projects incorporating drawings from more than one PC shall have duplicate sheet numbers modified to avoid duplication.

**4.4** Cross out all prior site-specific project approval stamps including DSA PC approval stamps.

**4.5** Obtain site plan approval from LFA.

**4.6** See applicable version of IR A-4 for geohazard report requirements.

**4.7** For projects where existing relocatable buildings are being relocated, the following note shall be added to the drawings:

**“Deterioration or Existing Non-Compliant Construction:** If any condition is discovered which, if left uncorrected, would make the building non-compliant with the requirements of the edition of CBC in force at the time of original construction, the condition must be corrected in accordance with current code requirements. A construction change document (CCD-Type A), or a separate set of plans and specifications detailing and specifying the required repair work shall be submitted to and approved by DSA before proceeding with the repair work.”

**4.8** For temporary relocatable buildings, a letter signed by the school district superintendent or the facilities manager shall be provided indicating that the buildings within this application are temporary and shall be removed from the school site within the appropriate number of years described below:

- For temporary relocatable buildings utilized for emergency placement following a

**OVER-THE-COUNTER REVIEW OF PROJECTS USING PRE-CHECK APPROVED DESIGNS**

disaster, the maximum use shall be limited to three years in accordance with CAC Section 4-302(b) and applicable version of IR A-1.

- For temporary relocatable buildings utilized for modernization or other purposes acceptable to DSA, the maximum use shall be limited to three years in accordance with CBC Chapter 9, and applicable version of IR A-1.

**4.9** Provide documentation defining the design flood elevation from the flood hazard map adopted by the local governing authority having jurisdiction where the project is located. See *PR 14-01: Flood Design and Project Submittal Requirements: 2016 and 2013 CBC* for flood hazard requirements. If a flood hazard exists, the building pad shall be raised above the design flood elevation or the foundation must be designed for forces due to flood water in accordance with ASCE/SEI 24 (Flood Resistant Design and Construction). Where the foundation design approach is selected, the project is not eligible for OTC review. Finished floor elevation shall be established in accordance with ASCE/SEI 24.

**5. CHANGES TO PC DOCUMENTS:** Changes to code-regulated aspects of PC documents are not permitted and shall be submitted and reviewed through the regular plan review process. Inconsequential changes may be made to the extent that they can be reviewed within the two-hour OTC time frame. Such changes shall be clouded on PC drawings and signed and stamped in accordance with *IR A-18: Use of Construction Documents Prepared by Other Professionals*, Section 2. It is the project design professional in responsible charge's responsibility to ensure that their drawings and the manufacturer's drawings are correctly coordinated and complete prior to submittal to DSA. Non-coordinated drawings may be cause for termination of the over-the-counter appointment. The original DSA Identification stamp on the affected sheet(s) need not be removed or crossed out.

**6. OTC APPOINTMENTS:** DSA schedules OTC reviews by telephone only. To schedule an appointment for OTC review, please call the receptionist at the appropriate DSA Regional Office, as listed below:

Regional Office	Phone #	Regional Office	Phone #
Oakland	(510) 622-3101	Los Angeles	(213) 897-3995
Sacramento	(916) 445-8730	San Diego	(858) 674-5400

- 6.1** If a scheduled appointment cannot be kept, DSA must be notified at least one week in advance.
- 6.2** If the project architect, structural engineer, or their authorized representative is late, the scheduled OTC appointment is subject to cancellation by DSA.
- 6.3** Any applicant who repeatedly violates Section 6.1 or 6.2 above may lose their privilege to use DSA's OTC process.
- 6.4** If any required document (see Section 7 below) is incomplete or missing from the OTC submittal package, the corresponding OTC appointment is subject to cancellation by DSA.
- 6.5** Clients are not permitted to substitute one project for another once OTC plan review is initiated.
- 6.6** Transferring or trading OTC plan review appointments between clients, architects, or engineers is not permitted.

---

## OVER-THE-COUNTER REVIEW OF PROJECTS USING PRE-CHECK APPROVED DESIGNS

- 6.7** A large single application is not permitted to be broken up into multiple appointments. This type of project will be reviewed as a regular project.
- 7. REQUIRED MATERIALS/INTAKE REVIEW:** The architect or structural engineer in general responsible charge shall prepare OTC packages that incorporate all the required documents listed on the form *DSA 3: Project Submittal Checklist* and OTC Package Checklist in Appendix A of this Policy. The form DSA 3 and OTC Package Checklist shall be submitted at the time of the appointment.
- 7.1** Prior to the start of OTC review, an intake review of the submittal will be performed to verify that all required material is provided, to determine that OTC review is appropriate for the project, and to confirm the review can be performed within the recommended two-hour time limit.
- 7.2** If DSA determines that the project cannot be reviewed within two hours (e.g., required materials are missing, site drawings are very complicated, changes from PC approval are proposed), the scheduled OTC appointment will be terminated.
- 7.3** When DSA determines that there is sufficient information to commence the plan review process and estimates that the review time required will exceed two hours, the project will be accepted as a regular plan review project.
- 8. OTC FEE SCHEDULE:** DSA fees are calculated based on estimated cost, actual cost of contract, and construction changes. Fees for OTC projects are identical to those for any other project submitted to DSA.

Use the DSA online fee calculator to calculate the required fees. For “Project Type” field, click on the drop-down button and select “School (K-12)”. For projects that only require access reviews, select “Access Compliance.” Then key in the cost information. Estimated cost must include total construction cost and all site work.

See DSA fee calculator at:

<https://www.apps2.dgs.ca.gov/DSA/Tracker/FeeCalculator.aspx>

---

A DSA Policy is a formally established set of governing statements based on law and code objectives, addressing any aspect of DSA's review and approval of plans and specifications and construction oversight programs that is not clearly addressed by code. A Policy also may specify administrative or technical requirements that are not yet addressed within Title 24, but are deemed important and necessary to fulfill code objectives in advance of adoption into the code.

**OVER-THE-COUNTER REVIEW OF PROJECTS USING PRE-CHECK APPROVED DESIGNS**

**Appendix A – OTC Package Checklist**

<b>A. Administrative Documents</b>		
1	<input type="checkbox"/>	Complete application (form DSA 1). Carefully verify all design parameters before checking appropriate boxes in Section 26 (supporting documentation may be requested to verify site conditions).
2	<input type="checkbox"/>	<b>Application fee:</b> Estimated cost must include building/structure and all site work. The cost of the building/structure need not be included if the building/structure is being relocated within the same school district. See Section 8 above for fee schedule.
3	<input type="checkbox"/>	For K through 12 schools, the Project Tracking Number (PTN) for coordination with the Office of Public School Construction (OPSC). To obtain a PTN number visit: <a href="https://www.dgsapps.dgs.ca.gov/OPSC/PT">https://www.dgsapps.dgs.ca.gov/OPSC/PT</a>
4	<input type="checkbox"/>	A copy of this completed checklist and a completed copy of the Project Submittal Checklist (form DSA 3).
5		Complete "Record Set Handling Instructions" ( <i>DSA 145: Paper Record Set Handling</i> ) and a copy of the drawing sheet index on 8-½" x 11" paper.
<b>B. Drawings</b>		
1	<input type="checkbox"/>	<b>Site Drawings (including all non-PC drawings):</b> One signed set of drawings, and one check set/print copy (additional check sets may expedite review; check with the respective DSA Regional Office) of site drawings showing building/structure locations, foundations, utility hook-ups, accessible path-of-travel, etc. The architect or structural engineer in general responsible charge must sign all site drawings.
2	<input type="checkbox"/>	<b>Applicable Building/Structure (PC) Drawings:</b> One signed set of drawings, and one check set/print copy (additional check sets may expedite review; check with the respective DSA Regional Office) of building/structure drawings which are exact duplicates of Item B3. The architect or structural engineer in general responsible charge must either sign all drawings or sign a statement of general conformance verifying that they have reviewed the building/structure drawings and that they are appropriate for use (see IR A-18). For PC drawings with multiple options, the selected options shall be clearly indicated.
3	<input type="checkbox"/>	<b>PC Comparison Set:</b> One complete set of DSA-approved PC drawings and specifications (see Procedure PR 07-01) for an identical building/structure to be used as a "comparison set."
4	<input type="checkbox"/>	If the project has more than four buildings on one site an electrical engineer must be identified on the application (form DSA 1) and shall be responsible for the site electrical design. The electrical engineer shall sign all electrical site drawings.
<b>C. Support Documents</b>		
1	<input type="checkbox"/>	Calculations for all work not included on PC drawings.
2	<input type="checkbox"/>	Geohazard report (when required per Section 3.1.5 above) with approval letter from the California Geological Survey (see applicable version of IR A-4).
3	<input type="checkbox"/>	Geotechnical (Soil) report/letter. <b>Exception:</b> A soils report is not required when all of the following conditions are met: <ul style="list-style-type: none"> <li>• The project includes only one-story, wood-frame or light-steel-frame buildings of Type II or Type V construction and is 4000 square feet or less in floor area.</li> <li>• Site is not located within an Earthquake Fault Zone or Seismic Hazard Zone, or in a seismic hazard zone as defined in the Safety Element of the local General Plan.</li> <li>• Foundations are designed based on a soil-bearing pressure of 1,000 psf or less for wood foundations or 1500 psf or less for concrete foundations, and a lateral passive pressure of 100 pcf or less.</li> </ul>
4	<input type="checkbox"/>	Signed and stamped <i>DSA 103: List of Required Structural Tests and Special Inspections</i> . This form should match the appropriate example form included on the PC drawings for the options utilized. Example forms on PC drawings must be crossed out or removed from the construction documents prior to approval.
5	<input type="checkbox"/>	When changes have been made to PC drawings, one set of PC structural calculations for reference are provided.

**OVER-THE-COUNTER REVIEW OF PROJECTS USING PRE-CHECK APPROVED DESIGNS**

6	<input type="checkbox"/>	Flood hazard map and/or supporting data adopted by the local jurisdiction (ref. CBC, § 1612A.3 & Procedure PR 14-01). This documentation is required for all sites, regardless of being in a flood hazard area or not, with proposed structures that are enclosed, whether inhabited or not (see PR 14-01 for exceptions for open-sided structures).
<b>D. Relocation Projects</b>		
Provide the following to verify the existing buildings are in compliance with DSA requirements. Also see applicable version of <i>IR 16-1</i> .		
1	<input type="checkbox"/>	Application number from the previous project where the building/structure was originally constructed.
2	<input type="checkbox"/>	Module number(s) or serial number(s) from the relocatable building(s).
3	<input type="checkbox"/>	The design professional in general responsible charge shall verify by appropriate means, subject to DSA approval, and submit a letter certifying that the building conforms to the original DSA-approved plans and specifications and has not suffered structural deterioration or been structurally altered.
<b>E. Fire and Life Safety (FLS) and Energy</b>		
1	<input type="checkbox"/>	Provide fire flow information per <i>PL 09-01: Fire Flow for Buildings</i> .
2	<input type="checkbox"/>	Code analysis per CBC Chapter 5 and site egress analysis per CBC Chapter 10 to safe dispersal area or public way for all existing buildings within 30 feet of the proposed building/structure location. (See Item B1 above.)
3	<input type="checkbox"/>	For projects to be funded, in whole or in part, by the Leroy F. Greene School Facilities Act of 1998 (i.e., box 16 on form DSA 1 is marked "YES"), buildings must be identified on plans as permanent or temporary (three years or less) as defined in CBC Chapter 2. Temporary buildings may have a manual fire alarm system if located 20 feet minimum from other permanent buildings.
4	<input type="checkbox"/>	Details and back-up information for the fire alarm system as applicable.
5	<input type="checkbox"/>	A letter signed by the architect or engineer in general responsible charge identifying the climate zone for the project site(s) and stating that the PC has been designed for that climate zone.