OFFICE OF PUBLIC SCHOOL CONSTRUCTION
STAKEHOLDER MEETING
September 3, 2026

PROPOSED AMENDMENTS TO THE SCHOOL FACILITY PROGRAM FOR THE CREATION OF A LEAD IN WATER TESTING AND REMEDIATION PROGRAM AND POTENTIAL REVISIONS TO THE FACILITY INSPECTION TOOL

PURPOSE

The purpose of this meeting is to continue discussion of proposed implementation plans for the new Lead in Water Testing and Remediation Program established by Assembly Bill (AB) 247, the Kindergarten through Grade 12 Schools and Local Community College Public Education Facilities Modernization, Repair, and Safety Bond Act of 2024 (Proposition 2), and of potential revisions to the Facility Inspection Tool (FIT).

Lead in Water Testing and Remediation Program
The Office of Public School Construction (OPSC) would like to continue discussion and receive additional stakeholder feedback on the lead in water testing and remediation assistance available pursuant to Education Code (EC) Section 17077.60, established by Proposition 2. This item discusses written comments from stakeholders received by OPSC and proposes additional concepts with the goal of ensuring clear program requirements for applicants. This topic was previously presented at the June 11, 2026 stakeholder meeting.

Facility Inspection Tool
OPSC would like to continue discussion and receive additional stakeholder feedback regarding potential revisions to the FIT as a result of audit recommendations issued by the California State Auditor (State Auditor) in November 2024. This item addresses stakeholder feedback received by OPSC, provides additional considerations and potential updates related to the State Auditor's recommendations, and presents examples of potential changes to the FIT for discussion purposes. This topic was previously presented at the October 30, 2025 and June 25, 2026 stakeholder meetings.

BACKGROUND

Note on Proposed Regulation and Form Changes
This stakeholder item makes proposed changes to the regulations and forms in effect as of August 27, 2026. This item does not reflect Board-approved proposed regulation and form changes that are pending in the rulemaking process and have not gone into effect. Future stakeholder meeting items and Board agenda items will reflect proposed regulation and form changes in effect at the time of publication.

AUTHORITY

See Attachments A13a and B1a.

SUMMARY AND NEXT STEPS

For the Lead in Water Testing and Remediation Program item, stakeholder feedback received from the last meeting may be found on Attachment A13b.

For the FIT item, stakeholder feedback received from the last meeting may be found on Attachment B1f.

Staff will review any feedback obtained in today's meeting and anything received through close of business on **Friday, September 18, 2026** and will address those suggestions in the next public meeting on the corresponding topic.

To submit written feedback after today's meeting, please email your suggestions to the OPSC Communications Team at OPSCCommunications@dgs.ca.gov.

ATTACHMENT A13

OFFICE OF PUBLIC SCHOOL CONSTRUCTION
STAKEHOLDER MEETING
September 3, 2026

PROPOSED AMENDMENTS TO THE SCHOOL FACILITY PROGRAM FOR THE CREATION OF A LEAD IN WATER TESTING AND REMEDIATION PROGRAM

PURPOSE

To discuss and receive stakeholder feedback resulting from Assembly Bill (AB) 247, the Kindergarten through Grade 12 Schools and Local Community College Public Education Facilities Modernization, Repair, and Safety Bond Act of 2024 (Proposition 2), which was approved by a majority of California's voters on November 5, 2024. This discussion and resulting stakeholder feedback will inform regulatory development and implementation of a new Lead in Water Testing and Remediation Program (Program) established by Proposition 2.

AUTHORITY

See Attachment A13a.

DESCRIPTION

This report is a continued discussion of the lead in water testing and remediation assistance available pursuant to Education Code (EC) Section 17077.60. The Office of Public School Construction (OPSC) staff received written comments from stakeholders (see Attachment A13b) following the initial presentation on this topic on June 11, 2026. This report addresses those comments and proposes additional concepts with the goal of ensuring clear Program requirements for applicants and OPSC as the Program administrator.

BACKGROUND

On June 11, 2026, OPSC presented concepts based on the new statutory authority of EC Section 17077.60. This statute provides authority for the State Allocation Board (Board) to establish funding cycles to provide a grant to test lead in water outlets used for drinking or preparing food on school sites constructed prior to January 1, 2010, serving pupils in kindergarten through grade 12 (K-12), and for the remediation of water outlets with lead levels in excess of 15 parts per billion (ppb).

The full text of the June 11 stakeholder meeting item may be found here: https://www.dgs.ca.gov/-/media/Divisions/OPSC/Agenda-Items/2026/06-June/06112026-Stakeholder-Meeting-Agenda-Item---Final.pdf

The June 11 meeting recording, which includes feedback that OPSC was able to respond to at the time, may be found here: June 11, 2026 Office of Public School Construction Stakeholder Meeting #21.

STAFF ANALYSIS/DISCUSSION

For purposes of this item, school districts and county offices of education (COE) will be referred to as "school districts."

Summary of Stakeholder Feedback

Staff would like to thank stakeholders who were able to view, attend, or participate in this meeting, as well as those who provided valuable feedback either at the meeting or through written correspondence to OPSC. Below is a summary of stakeholder comments, questions and feedback received during and following the June 11 meeting.

The full text of written stakeholder feedback can be found on Attachment A13b.

Stakeholder Feedback	OPSC Response
1. A stakeholder noted that Local Education Agencies (LEAs) are responsible for serving children with disabilities from ages 3 through 22. Licensed pre-school programs are subject to a 5 parts per billion (ppb) threshold for lead levels in drinking water. The stakeholder requests the regulations for the Lead in Water Testing and Remediation Program take this into account.	**1.** OPSC acknowledges LEAs' responsibility for these age ranges. The statute for this new Program authorizes funding for eligible school sites that serve grades K-12. Therefore, school districts may request funding for any eligible site under the Lead in Water Testing and Remediation Program that is inclusive of at least one of the K-12 grade levels. Regarding the stakeholder's reference to a 5 ppb threshold for other age groups, the statutory provisions for this program specify that funding shall be provided for testing and remediation of water outlets with lead levels exceeding 15 ppb. Therefore, OPSC does not have the authority to incorporate a lower threshold in the Program criteria.
2. A stakeholder requested clarification as to the "eligible construction date" regarding the statutory requirement that funding through this Program shall be provided for school sites that were constructed before January 1, 2010. The stakeholder inquired whether the date would be considered the Division of the State Architect (DSA) approval date plus 12 months, the Notice to	**2.** Regarding the eligible construction date, OPSC has prepared a response for consideration and discussion in the Additional Considerations section of this item.

STAFF ANALYSIS/DISCUSSION (CONT.)

Stakeholder Feedback	OPSC Response
2. (cont.) Proceed (NTP), the construction contract date, or the building construction date. Additionally, the stakeholder inquired how eligibility would be determined if construction began before January 1, 2010, but was completed after that date.	**2. (cont.)**
3. A stakeholder asked whether approvals from both the California Department of Education (CDE) and DSA are required for participation in this Program.	**3.** School Facility Program (SFP)-funded projects typically require school districts to obtain written approval from DSA and CDE for compliance with EC Sections 17070.50, 17072.30 and 17074.16. After reviewing these statutes, OPSC has prepared a response in the Additional Considerations of this item that outlines the required approvals at each funding cycle stage for the Program.
4. A stakeholder inquired whether the repair or replacement of building materials, such as walls or concrete damaged during lead testing, or replacement of pipes or fixtures containing lead, would fall under "related components" that are eligible for grant funding.	**4.** The repair or replacement of building materials damaged during the testing phase would not fall under "related components" and would not be eligible expenditures for this Program. OPSC notes that the recommended water outlet testing methodologies do not appear to involve invasive procedures. For the initial remediation phase of funding, OPSC anticipates that replacement of water outlets will be relatively non-invasive and will not require extensive repair or replacement of building materials. However, OPSC acknowledges that the proposed further remediation funding phase would likely involve more invasive remediation, including, but not limited to, replacing the pipes and fixtures, and replacement of building materials, such as walls or concrete. Thus, OPSC proposes these costs

STAFF ANALYSIS/DISCUSSION (CONT.)

Stakeholder Feedback	OPSC Response
4. (cont.)	**4. (cont.)** would be eligible project expenditures provided they are a result of the minimum work necessary. See the Additional Considerations section of this item below for more information on proposed eligible expenditures.
5. A stakeholder indicated that the United States Environmental Protection Agency (EPA) currently uses an action level of 10 ppb for lead in drinking water, and many school districts require that their drinking water meet or exceed State and Federal lead levels in drinking water standards. Thus, this stakeholder inquired if remediation and associated follow-up testing would remain eligible for reimbursement under the grant for school districts that elect to use the EPA action level of 10 ppb as their threshold?	**5.** As noted above, EC Section 17077.60 explicitly states that remediation funding is for lead levels in excess of 15 ppb in water outlets used for drinking or preparing food. School districts may receive funding to test eligible water outlets under this Program, but in accordance with the statutory requirements, school districts can only receive Program funding for remediation or replacement when the test results indicate that lead levels exceed 15 ppb.
6. A stakeholder suggested that grant recipients for this Program be prioritized based on evidence-based public health criteria to address the greatest need for remediation.	**6.** OPSC concurs that a priority-based system could be developed. OPSC is considering options with respect to potential preference points and a funding matrix and anticipates presenting further details at a future date.
7. A stakeholder suggested the maximum grant amount be calculated based on the number of water outlets at a school site versus enrollment tiers because, regardless of student enrollment, school sites have a set number of outlets that does not change.	**7.** OPSC will consider this input while developing the Program.

STAFF ANALYSIS/DISCUSSION (CONT.)

Stakeholder Feedback	OPSC Response
8. A stakeholder recommended the Lead in Water Testing and Remediation Program allow for the reimbursement of any test expenditure incurred after the legislation was enacted, as this stakeholder interprets EC Section 17077.60(c)(1) differently than OPSC. The stakeholder stated that EC Section does not specify that test results used to request funding from the second cycle must come from tests conducted in the first funding cycle; rather the test results must simply indicate elevated lead levels. This interpretation allows any school site that has elevated lead levels in water outlets to request funding in the second cycle, regardless of whether it received testing funding through the first cycle.	**8.** OPSC has considered the District's interpretation. However, the statute suggests a sequential order for testing, replacement of outlets, subsequent testing, and potential replacement of plumbing fixtures in succession, in which eligibility at each phase is determined before the applicant qualifies for the next phase of funding. Thus, OPSC interprets each phase of this Program as dependent on the one prior to it. Additionally, OPSC notes that previous testing results from as early as the July 3, 2024 enactment date of the authorizing legislation, may not necessarily be reflective of current lead levels if, for instance, the school district has already taken mitigation measures. As $115 million is reserved for the Program, OPSC is proposing that this Program be prospective from the point at which the applicable regulations and Form(s) are approved by the State Allocation Board and subsequently, the Office of Administrative Law.
9. A stakeholder requested OPSC clarify what "in likeness" to the *Facility Hardship Cost Estimate* (Form SAB 58-01) means. If this estimate form is to use Sierra West's *Current Construction Costs Remodeling Repair* (similar to the current Form SAB 58-01), what difficulty level should be used to estimate the costs? Additionally, if the Program allows for reimbursement of expenses incurred, will a school district be able to submit actual contract costs rather than estimated costs?	**9.** In the June 11 stakeholder meeting, OPSC proposed creation of a form for applicants to submit a cost estimate for eligible projects. With this stakeholder item, OPSC now proposes to provide fixed grant amounts for testing and water outlet replacement. If there are funds remaining to consider applications for additional remediation work, OPSC proposes creation of a cost estimate form for applicants to substantiate grant requests in the third cycle due to the potential unique nature

STAFF ANALYSIS/DISCUSSION (CONT.)

Stakeholder Feedback	OPSC Response
9. (cont.)	**9. (cont.)** of each site's repairs. In this case, OPSC anticipates creating a form that would use the Current Construction Costs Remodeling Repair publication by Sierra West Publishing for remediation of water outlets, pipes, and fixtures to show the unit cost breakdown of the necessary work. OPSC proposes that the Sierra West publication difficulty level would be F2 to align with the funding formulas provided in most OPSC/SAB programs.
10. A stakeholder suggested this Program should provide funding to support a diagnostic or source-identification step between testing and remediation in order to pinpoint the source of lead contamination, as replacing the faucet alone may not resolve the issue if the source is older plumbing behind a wall or service line. If lead contamination originates in the water supplier's system or upstream infrastructure, the stakeholder indicated that 30-second flush testing at the school site may not detect the issue. The stakeholder further suggests that water suppliers should be responsible for demonstrating that water is safe at the point when it enters the school. Otherwise, school districts could spend limited resources replacing fixtures and continue to have elevated lead levels because the source lies outside the school, leaving the underlying problem unresolved.	**10.** In accordance with statute, the stakeholder's recommendation could not be funded in the initial funding cycles which permit funding for testing and replacement of water outlets, nor in a second round of funding for testing after replacement of water outlets. If funds remain after the funding cycles for testing and replacement of eligible outlets, additional funding cycles could be established to allocate funds for the replacement of pipes and fixtures if testing demonstrates lead levels still exceed 15 ppb. OPSC proposes that a diagnostic or source-identification step may be an eligible expenditure within a proposed third funding cycle. OPSC encourages school districts to work with their local water agency to address this type of issue. Districts may also explore the Additional Resource section later in this report.

STAFF ANALYSIS/DISCUSSION (CONT.)

Additional Considerations for the Lead in Water Testing and Remediation Program

January 1, 2010 Construction Date

In response to stakeholder comment number two, OPSC has prepared information and background related to the EC Section 17077.60 requirement that funding for the Program shall be provided for eligible school sites that were constructed before January 1, 2010.

January 1, 2010 Background

Assembly Bill 1953 (Chapter 853, Statutes of 2006) amended Section 116875 of the California Health and Safety Code to prohibit, beginning January 1, 2010, the commercial introduction of any pipe, pipe or plumbing fixture, or fixture used to convey or dispense water for human consumption through drinking or cooking that is not "lead free," as defined in subdivision (e) of Health and Safety Code Section 116875. California Code of Regulations, Title 24, Part 5 (2007 and 2010 editions) further confirmed this requirement. Section 604.10 states,

> Water pipe and fittings with a lead content which exceeds eight (8) percent shall be prohibited in piping systems used to convey potable water. Note: On or after January 1, 2010, see Section 116875 of the Health and Safety Code for the lead content of pipes, pipe or plumbing fittings, or fixtures intended to conveyor dispense water for human consumption.

Additionally, the Department of Toxic Substances Control (DTSC) provided clarification on allowable lead content in pipes, pipe or plumbing fittings, fixtures, solder, or flux defined as "lead free." Prior to January 1, 2010, the maximum allowable lead content in lead in pipes and pipe fittings was 8 percent and 4 percent lead by dry weight in plumbing fittings and fixtures. After January 1, 2010, the maximum allowable lead content decreased to 0.25 percent in the wetted surfaces of pipes, pipe fittings, plumbing fittings and fixtures, as determined by a weighted average.

Building Construction Date Certification

In consideration of the above background material, OPSC proposes that applicants requesting funding would certify that buildings on a schoolsite, constructed before January 1, 2010, which had water outlets used for drinking or food preparation that were tested and/or replaced after January 1, 2010, are not included in the scope of the project. An application submittal to OPSC would indicate the number of eligible water outlets that they are requesting funding for that were not tested and/or replaced after January 1, 2010. Within the application, the District would certify that the funding requested for the water outlets is accurate and in compliance with the eligibility criteria outlined in EC Section 17077.60(a)(1). In response to a stakeholder inquiry above, OPSC proposes that the determination of whether a school building was "constructed before January 1, 2010," would specifically be made based on

STAFF ANALYSIS/DISCUSSION (CONT.)

whether the DSA approval date for construction of the building was on or after January 1, 2009. This approach of using 12 months after the DSA approval date is consistent with OPSC's existing determination of building age for purposes of SFP Modernization funding.

OPSC appreciates stakeholder consideration of this proposal.

CDE and DSA Plan Approvals

As discussed in stakeholder comment number three, applicants are typically required to obtain DSA and CDE plan approvals to request funding within the SFP, pursuant to EC Sections 17070.50, 17072.30, and 17074.16.

Testing Phase

OPSC proposes that applicants would not be required to obtain CDE and DSA approvals to receive funds for testing. In reviewing EC Sections 17070.50, 17072.30, and 17074.16, CDE and DSA approvals are required for site selection, building plans and specifications, and design and construction of buildings. Testing could be likened to design funding provided for other SFP New Construction and Modernization projects, for which neither CDE nor DSA approval is required. Finally, OPSC reached out to both CDE and DSA and they also confirmed they agree that no plan approvals for testing would be required.

Remediation – Replacement of Water Outlets

For the second phase of funding, projects that are strictly water outlet replacements appear to be subject to Access Compliance-only (AC) reviews by DSA. According to DSA IR A-22 (Attachment A13c), "Projects requiring only AC plan review and approval are not subject to DSA oversight during construction, nor are such projects certified by DSA." To ensure compliance with building code, applicants are encouraged to consult with DSA regarding their specific project scopes. If DSA determines that review and approval are not required, the applicant would be required to submit a complete and valid Form DSA 7 (Attachment A13d) to demonstrate that the project scope is exempt from DSA review. OPSC is collaborating with CDE to clarify whether "written approval" for such projects would be required.

Further Remediation

Should funding for further remediation be available, CDE and DSA plan approvals would likely be required for any eligible scope of work to replace any pipes or fixtures.

Summary of Proposed Eligible Expenditures

Proposed Eligible Expenditures for Testing

EC Section 17077.60 states that funding can be requested for testing of lead levels in all water outlets on a school site that are used for drinking or preparing food that

STAFF ANALYSIS/DISCUSSION (CONT.)

have not been constructed, tested, or replaced since January 1, 2010. OPSC proposes the following as eligible expenditures for testing:

- Consultant/technical assistance fees to develop a site inventory of all eligible water outlets on a given site, including preparation for testing/sampling of water outlets.
- Fees for the testing/sampling of eligible water outlets, including but not limited to:
    - Consultant/technical assistance fees
    - Use of a California Environmental Laboratory Accreditation Program (CA ELAP) certified lab for purposes of test results
- Fees for reports that may include sample location maps, photographs of every point of use, complete lab reports, chain-of-custody documentation, California Department of Public Health inspector certifications, and the lab's CA ELAP accreditation records.

Proposed Eligible Expenditures for Remediation of Water Outlets

EC Section 17077.60 states that funding can be requested for the remediation of lead in any water outlet used for drinking or preparing food with lead levels in excess of 15 ppb. OPSC proposes the following as eligible expenditures for remediation of water outlets and re-testing:

- Costs associated with the non-invasive replacement of water outlets used for drinking or preparing food, including, but not limited to:
    - Drinking water bubblers
    - Water coolers (chiller unit)
    - Classroom drinking faucets
    - Kitchen faucets (hot or cold), inclusive of Career Technical Education culinary programs and staff breakrooms
- Consultant, design professional, governmental and/or technical assistance fees affiliated with the replacement of water outlets.

Proposed Eligible Expenditures for Further Remediation

Education Code Section 17077.60 states that if funds are available following the proposed first and second funding cycles, additional funding can be requested to replace any pipes or fixtures that are contributing to the elevated lead levels if they do not fall below 15 ppb following the replacement of water outlets within the proposed second funding cycle. OPSC proposes the following as eligible expenditures for replacement of pipes and fixtures:

- "Lead free" pipes, pipe or plumbing fittings, fixtures, solder, or flux intended for human consumption through drinking or cooking:
- Construction management fees associated with the remediation of pipes and fixtures.
- The minimum necessary demolition and replacement costs associated with the remediation of pipes and fixtures, including but not limited to, the necessary replacement of building materials (such as walls or concrete).

STAFF ANALYSIS/DISCUSSION (CONT.)

- Removal of hazardous waste from a modernization project the DTSC has declared unsafe.

Proposed Application and Funding Process

In accordance with the statute, OPSC has prepared a broad outline for stakeholder consideration of a potential application process that would allocate Program funds in two rounds of funding with a testing cycle and remediation cycle in each round. EC Section 17077.60 (d) states that the "board shall establish funding cycles for the allocation of funds."

The proposal acknowledges that one designated funding cycle timeline for both testing and replacement may not accommodate all districts and all school sites. The rounds would be staggered at approximately six-month intervals as follows:

Round 1

Testing Cycle - Applicants may submit funding requests.
Replacement Cycle - Applicants submit funding requests to replace qualifying water outlets that tested in exceedance of 15 ppb, as demonstrated through submitted test results from the prior Testing Cycle.

Round 2

Testing Cycle - Applicants may submit funding requests to test water outlets at eligible school sites not funded in Round 1.

Replacement Cycle – Applicants submit funding requests to replace qualifying water outlets that tested in exceedance of 15 ppb, as demonstrated through test results gathered from a prior Testing Cycle (either Round 1 or 2).

Grant Amounts

OPSC proposes that a fixed grant amount be established per eligible school site to perform the necessary testing. Considerations for determining this amount include capacity of the site and number of existing, eligible water outlets.

OPSC also proposes that a fixed grant amount be established per qualifying outlet to be replaced. Consideration for determining this amount may include the type of water outlet being replaced, i.e. wall unit, free standing drinking fountain, in-classroom drinking fountain, or kitchen faucet.

Outline of Process – Testing Cycles

- OPSC is considering whether applicants would submit one funding application for all eligible school sites, or if separate applications will be required for each eligible school site.
- Grant amount will be calculated based on the number of eligible school sites and number of outlets to be tested.

STAFF ANALYSIS/DISCUSSION (CONT.)

- Funding will be provided on a 60-percent state and 40-percent local match basis with any applicable Local Funding Adjustment Grant.
- Financial Hardship assistance is also available for qualifying applicants.
- The Priority Funding process will apply.
- Grant Agreement requirements will apply.
- Program reporting requirements for expenditures will apply post fund release.

Outline of Process - Remediation Cycle

- OPSC is considering whether to have applicants submit one funding application to replace qualifying outlets for all eligible sites, or one application to replace qualifying outlets per eligible school site, with test results that demonstrate lead levels in excess of 15 ppb.
- Grant amount will be calculated based on the number of qualifying water outlets to be replaced per school site.
- Funding will be provided on a 60-percent state and 40-percent local match basis with any applicable Local Funding Adjustment Grant.
- Financial Hardship assistance is also available for qualifying applicants.
- The Priority Funding process will apply.
- Grant Agreement requirements will apply.
- Program reporting requirements for expenditures will apply post fund release.

Future Discussion

For a future meeting, OPSC anticipates discussing and opening the conversation for stakeholder feedback on the following:

- Prioritization criteria and a scoring matrix for purposes of determining funding order when a proposed funding cycle is oversubscribed;
- A new *Application for Lead in Water Testing and Remediation Program Funding* (Form SAB 50-TBD);
- Considerations to streamline the fund release process during Cycles 1 and 2 within the Lead in Water Testing and Remediation Program; and
- Proposed regulations for the Lead in Water Testing and Remediation Program, including proposed regulations establishing eligibility requirements, Program accountability requirements, and reporting requirements.

Additional Resource

State Water Resources Control Board

For issues related to water sources outside school district facilities, please contact the State Water Resources Control Board (SWRCB). SWRCB has a program called the Lead Service Line Replacement Funding Program that provides funding through the Drinking Water State Revolving Fund for lead service line identification and replacement outside of school boundaries.

NEXT STEPS

OPSC welcomes any feedback from stakeholders regarding the proposed concepts.

Staff will review any feedback obtained in today's meeting and anything received through close of business on **Friday, September 18, 2026**, and will address those suggestions in the next public meeting on this topic.

To submit written feedback after today's meeting, please email your suggestions to the OPSC Communications Team at OPSCCommunications@dgs.ca.gov.

AUTHORITY

Education Code (EC) Section 17070.50. General Provisions
The board shall not apportion funds to any school district, unless the applicant school district has certified to the board that the services of any architect, structural engineer, or other design professional for any work under the project have been obtained pursuant to a competitive process that is consistent with the requirements of Chapter 10 (commencing with Section 4525) of Division 5 of Title 1 of the Government Code and has obtained the written approval of the State Department of Education that the site selection, and the building plans and specifications, comply with the standards adopted by the department pursuant to subdivisions (b) and (c), respectively, of Section 17251**.**

EC Section 17072.30. New Construction Funding Process
(a) Subject to the availability of funds, the board shall apportion funds to an eligible school district only upon the approval of the project by the Department of General Services pursuant to the Field Act, as defined in Section 17281, and certification by the school district that the required matching funds from local sources have been expended by the district for the project, or have been deposited in the county fund, or will be expended by the district by the time the project is completed, in an amount at least equal to the proposed apportionment pursuant to this chapter, before release of the state funds.
…

EC Section 17074.16. Modernization Apportionment
(a) ...Subject to the availability of funds, the board shall apportion funds to an eligible school district only upon the approval of the project by the Department of General Services pursuant to the Field Act, as defined in Section 17281, including, but not limited to, a project that complies with the Field Act by complying with Section 17280.5...

EC Section 17077.60. Testing and Remediation of Lead Levels in Water at Schoolsites
(a) (1) With funds made available for this purpose, the board shall provide a grant to test for lead in water outlets used for drinking or preparing food on schoolsites serving kindergarten or any of grades 1 to 12, inclusive, that were constructed before January 1, 2010, and for the remediation of any water outlets with lead levels in excess of 15 parts per billion.
(2) The board shall release disbursements to school districts with approved applications for purposes of this article, to the extent state funds are available, consistent with the applicable school district’s local and state contribution percentages determined pursuant to Section 17074.16. Subject to the availability of funds, the board shall apportion funds to an eligible school district only upon review of evidence that the required local matching funds, for the applicable school district determined pursuant to Section 17074.16, have been expended by the school district for the project, have been deposited in the county fund, or will be expended by the school district by the time of

AUTHORITY (cont.)

completion of the project, and upon review of evidence that the school district has entered into a binding contract for the completion of that project.
(b) (1) A school district that applies for funding to test lead levels in water outlets used for drinking or preparing food shall be required to test all outlets on the schoolsite, except outlets that have been tested or replaced since January 1, 2010.
(2) A school district shall provide the test results to the Office of Public School Construction and the community water system that serves the school district.
(c) (1) A school district may request a grant for the replacement of a water outlet used for drinking or preparing food if the test results indicate lead levels for that water outlet exceed 15 parts per billion.
(2) Additional testing shall be required upon completion of the remediation efforts specified in paragraph (1) to ensure that lead levels have fallen below 15 parts per billion.
(d) The board shall establish funding cycles for allocation of funds. If funds are available at the conclusion of the funding cycles, the board may adopt regulations to provide grants to replace any pipes or fixtures that are contributing to the elevated lead levels if lead levels do not fall below 15 parts per billion after additional testing has been performed, as specified in paragraph (2) of subdivision (c).
(e) The board may consider setting a maximum amount on the grant to be provided for testing and remediation.

Health and Safety Code Section 116875. Lead Materials
(a) No person shall use any pipe, pipe or plumbing fitting or fixture, solder, or flux that is not lead free in the installation or repair of any public water system or any plumbing in a facility providing water for human consumption, except when necessary for the repair of leaded joints of cast iron pipes.
(b)(1) No person shall introduce into commerce any pipe, pipe or plumbing fitting, or fixture intended to convey or dispense water for human consumption through drinking or cooking that is not lead free, as defined in subdivision (e). This includes kitchen faucets, bathroom faucets, and any other end-use devices intended to convey or dispense water for human consumption through drinking or cooking, but excludes service saddles, backflow preventers for nonpotable services such as irrigation and industrial, and water distribution main gate valves that are two inches in diameter and above.
(2) Pipes, pipe or plumbing fittings, or fixtures that are used in manufacturing, industrial processing, for irrigation purposes, and any other uses where the water is not intended for human consumption through drinking or cooking are not subject to the requirements of paragraph (1).
(3) For all purposes other than manufacturing, industrial processing, or to convey or dispense water for human consumption, “lead free” is defined in subdivision (f).
(c) No person engaged in the business of selling plumbing supplies, except manufacturers, shall sell solder or flux that is not lead free.

AUTHORITY (cont.)

(d) No person shall introduce into commerce any solder or flux that is not lead free unless the solder or flux bears a prominent label stating that it is illegal to use the solder or flux in the installation or repair of any plumbing providing water for human consumption.
(e) For the purposes of this section, “lead free” means not more than 0.2 percent lead when used with respect to solder and flux and not more than a weighted average of 0.25 percent when used with respect to the wetted surfaces of pipes and pipe fittings, plumbing fittings, and fixtures. The weighted average lead content of a pipe and pipe fitting, plumbing fitting, and fixture shall be calculated by using the following formula: The percentage of lead content within each component that comes into contact with water shall be multiplied by the percent of the total wetted surface of the entire pipe and pipe fitting, plumbing fitting, or fixture represented in each component containing lead. These percentages shall be added and the sum shall constitute the weighted average lead content of the pipe and pipe fitting, plumbing fitting, or fixture.
(f) For the purposes of paragraph (3) of subdivision (b), “lead free,” consistent with the requirements of federal law, means not more than 0.2 percent lead when used with respect to solder and flux and not more than 8 percent when used with respect to pipes and pipe fittings. With respect to plumbing fittings and fixtures, “lead free” means not more than 4 percent by dry weight after August 6, 2002, unless the department has adopted a standard, based on health effects, for the leaching of lead.
(g)(1) All pipe, pipe or plumbing fittings or fixtures, solder, or flux shall be certified by an independent American National Standards Institute (ANSI) accredited third party, including, but not limited to, NSF International, as being in compliance with this section.
(2) (A)The certification described in paragraph (1) shall, at a minimum, include testing of materials in accordance with the protocols used by the Department of Toxic Substances Control in implementing Article 10.1.2 (commencing with Section 25214.4.3) of Chapter 6.5 of Division 20.
(B) The certification required pursuant to this subdivision shall not interfere with either the department’s exercise of its independent authority to protect public health pursuant to this section, or the Department of Toxic Substances Control’s exercise of its independent authority to implement Article 10.1.2 (commencing with Section 25214.4.3) of Chapter 6.5 of Division 20.
(3) It is the intent of the Legislature that this subdivision only provide guidance and assistance to the entities that use an independent ANSI accredited third party to demonstrate compliance with this section. Any tests developed by an independent ANSI accredited third party in accordance with this subdivision shall have no weight of authority under California statute.
(4) Notwithstanding paragraph (1), the department shall retain its independent authority in administering this article.
(h) This section shall become operative on January 1, 2010. The requirement described in subdivision (g) shall not be construed in any manner as to justify a delay in compliance with the lead-free standard set forth in subdivision (e).

Los Angeles Unified School District
333 S. Beaudry Avenue, 24th Floor
Los Angeles, California 90017
Phone: (213) 241-7000

June 25, 2026

Dear Ms. Kirk,

On behalf of the Los Angeles Unified School District (Los Angeles Unified), we appreciate OPSC's Proposition 2 stakeholder engagement and welcome the opportunity to provide input on the proposed amendments to the Schol Facility Program in response to Proposition 2.

The comments and recommendations provided below correspond to the topics raised and materials provided for the June 11, 2026 Implementation Stakeholder Meeting #21.

Repair and Replacement of Walls or Concrete

The process of repairing or replacing pipes and fixtures containing lead may involve the deconstruction of walls or concrete needed for workers to access lead containing pipes or materials found underground or within walls.

The Proposition 2 language and the initial questions to stakeholders specify that eligible expenditures are the removal and replacement of pipes and water outlets used for human consumption such as faucets, water fountains and related components. Los Angeles Unified would appreciate clarification whether the repair or replacement of building materials (e.g., walls or concrete) damaged in the process of testing or replacing lead containing pipes or fixtures fall under "related components" and are eligible for grant funding.

To the extent these expenditures are impermissible under the language of Proposition 2, Los Angeles Unified would request OPSC's regulations affirm they would be considered a valid expenditure using matching funds.

Remediation Threshold

The US Environmental Protection Agency (EPA) and the Centers for Disease Control and Prevention (CDC) agree that there is no known safe level of lead in a child's blood and has established a non-enforceable maximum contaminant level goals (MCLGs) for lead in drinking

water of zero. Similarly, the EPA currently uses an action level of 10 ppb for lead in drinking water.

As such, many school districts including Los Angeles Unified requires that their drinking water meet or exceed all State and Federal lead in drinking water standards.

Proposition 2 specifies that the program remediation threshold for lead in drinking water is 15 ppb, consistent with the state standard.

Would remediation and associated follow-up testing remain eligible for reimbursement under the grant for school districts that elect to use the EPA action level (i.e., 10 ppb) as their threshold?

Prioritization

With the understanding that the full $115 million allocation to the grant program may be insufficient to address statewide lead remediation needs across California's schools, Los Angeles Unified recognizes that prioritization may be necessary.

To that end, we recommend that recipients be prioritized based on evidence-based public health criteria to address the greatest need for remediation.

OPSC Question and Response #9 (page 6)

Los Angeles Unified recommends the Lead in Water Testing Remediation Program allow for the reimbursement of any test expenditure incurred after the legislation was enacted.

OPSC Question and Response #9 (page 6)

Los Angeles Unified disagrees with OPSC's interpretation of the education code that funding requested in the second cycle must be for school sites that had water outlets tested in the first cycle. Education Code 17077.60(c)(1) states:

> "A school district may request a grant for the replacement of a water outlet used for drinking or preparing food if the test results indicated lead levels for that water outlet exceed 15 parts per billion."

The code does not specify the test results used to request second round funding must be results from tests conducted using first round funding, it simply states that test results need to indict elevated levels. Los Angeles Unified recommends the request for second round funding be available to all school sites that have elevated lead levels in drinking outlets, and not be linked to only schools sites that received testing funding through the first round.

OPSC Question and Response #10 (page 7)

Los Angeles Unified requests clarification on what is considered the "eligible construction date"? What will be the date used if construction began before January 1, 2010 but was not complete until after that date?

OPSC Question and Response #11 (page 7)

Los Angeles Unified requests additional information about the "in likeness" Form SAB 58-01 that is referenced in this response. If this estimate form is to use Sierra West's *Current Construction Cost Remodeling Repair Costs* (similarly to how the current Form SAB 58-01 form uses) what difficulty level should be used to estimate the costs? Additionally, if the program allows for reimbursement of expenses incurred, will a district be able to submit actual contract costs rather than estimated costs?

OPSC Question and Response #16 (page 9)

Los Angeles Unified recommends the maximum grant amount be calculated based on the number of water outlets at a school site rather than the enrollment tiers suggested in the materials. This suggestion is made because regardless of student enrollment, school sites have a set number of outlets that do not change.

Sincerely,

Sasha Horwitz
Legislative Advocate
Los Angeles Unified School District

From: Mishaal Gill <mgill@casbo.org>
Sent: Friday, June 26, 2026 11:45 AM
To: DGS OPSC-Communications <OPSCCommunications@dgs.ca.gov>
Cc: Sara Pietrowski <spietrowski@casbo.org>
Subject: Access Lead in Water Testing and Remediation Program Funding Feedback

Good afternoon,

I am writing to provide feedback regarding the Access Lead in Water Testing and Remediation Program Funding. Below is the feedback on behalf of the California Association of School Business Officials (CASBO):

- The funding being made available for testing and fixture replacement is helpful. However, the program should include a source-identification step before remediation is required.
    - If elevated lead levels are detected, replacing the faucet alone may not resolve the issue if the source is older plumbing behind a wall or service line.
    - Funding should support a diagnostic or source-identification step between testing and remediation to pinpoint the source of contamination.
- The 30-second flush is helpful when the issue is in the school's plumbing or fixtures, such as solder joints, older pipes, or outdated fixtures. However, that may only tell part of the problem.
    - If lead contamination originates in the water supplier's system or upstream infrastructure, flush testing at the school may not detect it.
    - Water suppliers should be responsible for demonstrating that water is safe at the point when it enters the school. Otherwise, districts could spend limited resources replacing fixtures and continue to have elevated lead levels because the source lies outside the school, leaving the underlying problem unresolved.
- Funding should also be directed toward addressing the actual source of contamination rather than assuming the problem is the fixture or school facility.
    - Without identifying the source, districts may spend limited resources replacing fixtures while the underlying issue remains unresolved.

If you have any questions, please feel free to reach out.

Thank you,

Mishaal

Mishaal Gill (She/her/hers)

Director of Policy and Advocacy
California Association of School Business Officials
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DSA

IR A-22

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Disciplines: All

History: Revised 07/06/26
Last Revised 04/23/25
Original Issue 08/15/08

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 the scope of construction work that is eligible to be exempt from plan review and approval by DSA. Construction documents for alteration, reconstruction, or new construction projects meeting the criteria defined herein need not be submitted to DSA. Additionally, this IR clarifies inspection, testing, construction oversight, and certification requirements for such projects.

SCOPE

This IR is applicable to construction projects at public K-12 schools and community colleges. It addresses plan review and approval exemptions for each of the three DSA plan review disciplines: Structural Safety (SS), Fire and Life Safety (FLS), and Access Compliance (AC). In many cases, plan review and approval exemptions vary by plan review discipline. This IR is not applicable to state-owned or state-leased essential service facilities, which also fall under DSA jurisdiction.

BACKGROUND

California Administrative Code (CAC) Section 4-310 defines various buildings and structures that are commonly constructed, owned, and operated by school districts but are not governed by the jurisdiction of the Field Act. CAC Section 4-314 defines the term “School Building” and in so doing excludes various elements and ancillary structures from this definition. These provisions inform the scope of construction work that is eligible for exemption from DSA review, approval, and construction oversight; however, some work not governed by the Field Act requires AC review and approval in accordance with CAC Section 5-101.

Separately, CAC Section 4-315 excludes maintenance work from review and approval requirements. Maintenance work is defined in CAC Section 4-314 and is governed by the jurisdiction of the Field Act.

CAC Sections 4-308 and 4-309(a) define project cost thresholds below which alteration or reconstruction projects may be exempt from plan review, approval, and construction oversight by DSA. Maintenance work is separate from the work of alteration and reconstruction projects and is therefore excluded from the project cost in consideration of these thresholds.

For the purposes of this IR, the design professional in general responsible charge (DPGRC) is as established in CAC Section 4-316(a).

1. CODE COMPLIANCE

All public school construction projects, including those exempt from DSA review, approval, and construction oversight, must comply with the currently effective Title 24, California Code of Regulations (CCR).

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

1.1 School District Responsibility

When authorizing construction of exempt projects, the school district assumes responsibility to ensure compliance with all applicable code provisions.

1.1.1 The school board is responsible for employing or retaining appropriately licensed architects or registered engineers to prepare the construction documents.

1.1.2 The school district is responsible for employing or retaining a laboratory and inspectors to provide the required testing of materials and inspection of construction work.

1.1.3 Refer to Section 5.1.1 below for DSA concurrence of the determination that construction work is exempt from review and approval requirements.

1.2 "Access Only" Projects

Projects requiring only AC plan review and approval are not subject to DSA oversight during construction, nor are such projects certified by DSA. School districts should be aware that this can lead to the following difficulties:

1.2.1 Potential delays in DSA approval of future projects relying on construction work completed in the uncertified project to establish a compliant path of travel. See *Procedure (PR) 15-01: Required Information for Path of Travel Upgrades on Construction Documents* for additional information.

1.2.2 Denial of future unreasonable hardship determinations. See *PR 24-04 Request for Finding of Unreasonable Hardship Per CBC 11B-202.4 Exception 8*, for additional information.

2. EXCEPTION BASED ON SCOPE

The scope of construction work not governed by the Field Act is eligible for exemption from plan review and approval in accordance with Sections 2.1 and 2.2 below. DSA policy permits other work to be exempt from some plan review disciplines in accordance with Section 2.3 below.

2.1 Work not Governed by the Field Act

The following construction work does not require SS and FLS plan review, approval, or construction oversight. These scopes of work are itemized in Appendix A below.

2.1.1 Structures or elements excluded from the definition of a "School Building" per CAC Section 4-314 as itemized in Appendix A below. AC review and approval may be required as denoted in the appendix.

2.1.2 Buildings or structures excluded from the jurisdiction of the Field Act per CAC Section 4-310. Refer to Section 2.2.3 below for requirements associated with this exemption. AC review and approval may be required as itemized in Appendix A below.

2.1.3 Charter schools that are not funded under the Charter School Facilities Program, administered by the Office of Public School Construction. Refer to *Policy (PL) 17-01: Charter Schools Enforcement Jurisdiction* for additional information.

2.2 Regulatory Requirements

Design and construction of the work described in Section 2.1 above must comply with Title 24, CCR as adopted and amended by the California Building Standards Commission.

2.2.1 Construction documents shall be prepared by appropriately licensed architects or registered engineers.

2.2.2 To comply with Section 1.1.2 above, it is recommended that the school district hire DSA-certified inspectors and a laboratory qualified by the DSA Laboratory Evaluation and Acceptance (LEA) program; however, this inspection and testing may be performed by

personnel and an agency without these qualifications.

2.2.3 Buildings or structures exempt from plan review, approval, and construction oversight per Section 2.1.2 above shall comply with the following requirements per CAC Section 4-310:

2.2.3.1 A copy of the resolution passed by the school board shall be submitted to the DSA regional office with jurisdiction over the school site.

2.2.3.2 Signage restricting pupil and teacher entry and stating the structure does not meet the structural standards imposed by law for earthquake safety of school use shall be posted.

2.2.3.3 Measures shall be taken to prevent use by and injuries to pupils and teachers as a result of collapse of the structure. The most commonly accepted measure taken for this purpose is constructing fencing around the structure, set back a distance equal to its height.

2.3 Exempt Scope per DSA Policy

In addition to and separate from the scopes of work excluded from Field Act jurisdiction, DSA policy has determined that plan review and approval of other work is not required by some plan review disciplines. These scopes of work are itemized in Appendix C below.

2.3.1 DSA has determined that the work itemized in Appendix C constitutes a school building as defined in CAC Section 4-314. In most cases these elements fall under “utility systems or facilities necessary to the complete functioning of the structures…”

2.3.2 Because the elements listed in Appendix C are subject to the jurisdiction of the Field Act, their design and construction must comply with Title 24, CCR as adopted and amended by DSA, including construction documents prepared by a design professional appropriately licensed or registered in the State of California and construction oversight by a DSA-certified project inspector and an LEA qualified Laboratory of Record (LoR).

2.4 Playground Equipment with Shade Canopy

Playground equipment is not a school building in accordance with CAC Section 4-314.

2.4.1 SS plan review and approval is required for shade canopies that are provided by the playground equipment manufacturer as a feature integral with the playground equipment unless both the following requirements are satisfied:

2.4.1.1 The plan area of the shade canopy does not exceed 120 square feet. Where individual elements (e.g., sails) overlap, the square footage used in the determination of this exemption is the sum of each separate element with no discount for overlapping area.

2.4.1.2 The shade canopy design provides a dedicated structure to the ground that does not rely on playground equipment for vertical support. The dedicated structure must be independent of (but not necessarily separate from) the playground equipment structure.

2.4.2 When not eligible for an SS plan review exemption, shade canopies integral with playground equipment are permitted to be a deferred submittal.

2.4.3 All members, components, and connections in the load paths resisting the code-prescribed forces shall be evaluated (e.g., foundation, columns, poles, shade support members, etc.). Other playground equipment elements (e.g., platforms, slides, climbing walls, etc.) outside these load paths and not directly supporting the shade canopy need not be reviewed.

2.5 Electric Vehicle (EV) Charging Stations

Additional considerations for EV charging stations are provided in this section.

2.5.1 New parking areas require electric vehicle charging stations per California Green Building Standards Code (CALGreen) Section 5.106.5.6.

2.5.2 Restriping or reconfiguration of existing parking areas resulting in additional parking spaces requires EV charging stations per CALGreen Section 5.106.5.6.4.

2.5.3 The equipment installed for EV charging stations requires SS review of new or modified parking areas per Section 2.5.1 and 2.5.2 above.

3. MAINTENANCE

Maintenance work is defined in CAC Section 4-314 and does not require DSA review and approval in accordance with CAC Section 4-315. Common types of maintenance work are summarized in Appendix B below.

3.1 Reroofing

Reroofing includes both “roof recover” and “roof replacement” in accordance with the definitions of all three terms in California Building Code (CBC) Section 202 and California Existing Building Code (CEBC) Section 202. While the CEBC classifies reroofing as an alteration, the definition of maintenance in CAC Section 4-314 permits some reroofing projects to be classified as maintenance. For reroofing to be considered maintenance, it must comply with the limitations of its definition and this section.

3.1.1 Reroofing shall comply with CBC Section 1512.

3.1.2 Replacement of clay tile, concrete tile, slate shingles, and metal panel roof systems are not considered “in-kind” replacement due to the unique nature of their fastening requirements. These systems are not exempt and require DSA review and approval.

3.1.3 Changing a roof system is not an “in-kind” replacement and therefore does not qualify as maintenance per the CAC definition. Changing a roof system is an alteration, not maintenance. The cost thresholds described in Section 4.1 below may apply.

3.1.4 Recovering with a second layer of the same roofing material is exempt as reroofing maintenance provided the additional layer does not exceed the weight of the original roofing material. Recovering with a different roofing material does not qualify as maintenance per the CAC definition and is, therefore, an alteration. The cost thresholds described in Section 4.1 below may apply.

3.1.5 If dry-rot or another issue requiring structural repair is discovered during a reroofing only project, such repair will be considered reconstruction, not maintenance. The cost thresholds described in Section 4.1 below may apply.

3.1.6 Reroofing is exempt from AC review and approval in accordance with CBC Section 11B-202.4, Exception 7.

3.1.7 Removal and reinstallation of existing solar photovoltaic (PV) systems for reroofing is not an "in-kind" roofing replacement and therefore does not qualify as maintenance per the CAC definition. This work is considered an addition in accordance with Section 4.4.1 below. Existing details may be reused upon determination that the thresholds of CAC Section 4-309(a) or CEBC Section 503.3 are not exceeded.

3.2 Mechanical, Electrical, and Plumbing Equipment

The definition of maintenance in CAC Section 4-314 prohibits “the replacement of large mechanical, electrical, or plumbing units or systems” from being classified as maintenance.

3.2.1 The replacement of existing, functioning equipment is not considered maintenance.

3.2.2 The replacement of all units in an existing system is not considered maintenance.

3.2.3 Replacement “in-kind” of failed or failing mechanical, electrical, and plumbing equipment is considered maintenance and is exempt when all the following conditions are met:

3.2.3.1 Weight less than or equal to the unit it is replacing.

3.2.3.2 Weight no more than 2,000 pounds.

3.2.3.3 Installation in the same location as the unit it is replacing.

3.2.3.4 Installation does not require alteration of the existing structural framing, alteration of the existing supporting curb or platform, or the introduction of an adaptive metal curb that raises the center of gravity of the unit or requires fasteners that cannot be determined from the "replacement in-kind" principle.

3.2.3.5 Installation does not require alteration of the existing ceiling.

3.2.3.6 Installation does not require replacement of ductwork, grilles, electrical service, or gas service.

3.2.4 Mechanical and electrical maintenance work is exempt from AC review and approval in accordance with CBC Section 11B-202.4, Exception 7; however, replacement of plumbing fixtures is not exempt and must be submitted for AC review and approval. Refer to *IR 11B-6: Accessibility Review of Mechanical (HVAC) Projects.*

4. PROJECT EXEMPTION BASED ON COST

Reconstruction and alteration projects to existing school buildings with construction cost less than the thresholds defined by the regulations do not require DSA review, approval, and construction oversight. The cost thresholds are adjusted annually for inflation in accordance with *U.S. 20 City Construction Cost Index*, which is published in the January issue of Engineering News-Record.

4.1 Exemption Thresholds

The following cost thresholds apply to alteration or reconstruction projects. Site work does not constitute an alteration or reconstruction of an existing school building.

4.1.1 Alteration or reconstruction projects to existing school buildings contracted in 2026 with construction cost less than or equal to $134,000 are exempt from SS, FLS, and AC plan review, approval, and construction oversight in accordance with CAC Section 4-308.

4.1.2 Alteration or reconstruction projects to existing school buildings contracted in 2026 with construction cost exceeding $134,000 but less than $301,500 are exempt from SS and FLS plan review, approval, and construction oversight in accordance with CAC Section 4-309(a) when **all** the conditions of Section 4.2.4 below are met, which includes submitting documentation to DSA.

4.2 Regulatory Requirements

Design and construction of the work described in Section 4.1 above must comply with Title 24, CCR as adopted and amended by DSA and the State Fire Marshal.

4.2.1 Construction documents shall be prepared by a design professional appropriately licensed or registered in the state of California.

4.2.2 Inspection shall be performed by a DSA-certified project inspector.

4.2.3 Material testing shall be performed by a laboratory qualified under the LEA Program.

4.2.4 Buildings or structures exempt from plan review, approval, and construction oversight per Section 4.1.2 above shall comply with the following per CAC Section 4-309(a):

4.2.4.1 A California-registered structural engineer shall examine the project and prepare a written statement certifying that the project does not contain any work of a structural nature. The statement must attest that the work does not cause any alteration or reconstruction of structural

components nor trigger structural rehabilitation per CAC Section 4-309(c). This statement shall bear the stamp (seal) and signature of the structural engineer and be submitted to the DSA regional office with jurisdiction over the school site prior to commencing construction. Work of a structural nature includes the following:

4.2.4.1.1 Alteration to or reconstruction of the building structure.

4.2.4.1.2 New or changes to existing nonstructural components attached to the building structure that are required by the CBC to resist structural loads, such as equipment, ceilings, partitions, cabinets, veneer, etc.

4.2.4.2 The DPGRC of the project shall prepare a statement and submit it to the DSA regional office with jurisdiction over the school site prior to commencing construction. This statement shall bear the stamp (seal) and signature of the DPGRC and certify that the construction documents comply with the following:

4.2.4.2.1 Contain no work that is regulated by the accessibility standards of Title 24, CCR.

4.2.4.2.2 Contain no work that triggers accessibility upgrades to any existing building or the facility.

4.2.4.2.3 Meet all applicable fire and life safety requirements.

4.2.4.3 Within 10 days of completion of construction, a DSA-certified project inspector shall sign and submit to DSA a verified report, form *DSA 999: Inspection Verified Report for Projects Exempt from DSA Approval*, indicating that the completed project is in conformance with the construction documents. The DSA 999 is not required for other exempt alteration or reconstruction projects.

4.3 Project Cost Determination

For the purpose of this IR and unless noted otherwise, the project construction cost shall be the entire contracted scope of work, including exempt elements. Refer to *IR A-23: Construction Cost Reporting and DSA Fees* for additional information. Project cost shall be based on the construction scope at one site only.

4.3.1 The construction cost shall be determined at the completion of project design and again at the completion of construction. If the final actual project cost exceeds the cost threshold defined by the regulations, the project is not exempt from DSA oversight. In such cases, the school district shall notify the DSA regional office with jurisdiction over the school site and meet with a manager or supervisor to discuss and establish compliance requirements based on the specifics of the project.

4.3.2 In accordance with California Education Code (EDC) Sections 17280 and 81133, the construction cost used in determining eligibility for the DSA review exemption shall not include the cost of air-conditioning equipment and insulation material cost. For purposes of this provision, air-conditioning equipment includes heating, ventilation, and air-conditioning (HVAC): air-conditioning units, heating units, or ventilation units. The cost of ductwork or utility services (i.e., electrical or gas service) to the equipment shall not be excluded.

4.3.2.1 Installation costs for the work of Section 4.3.2 above may also be excluded.

4.3.2.2 Costs of removing and replacing finishes required to accomplish the work of Section 4.3.2 above shall not be excluded.

4.3.3 In accordance with CAC Sections 4-308 and 4-309(a), construction projects shall not be subdivided for the purpose of evading DSA review, approval, and construction oversight.

4.3.4 In accordance with CAC Section 4-308, work classified as maintenance per CAC Section 4-314 need not be included in the project construction cost.

4.4 Additions

The project cost thresholds established in CAC Section 4-308 and 4-309(a) do not apply to projects categorized as additions. Refer to *IR EB-1: Existing Building Regulations Overview* Section 4.1 for additional information.

4.4.1 Installation of new and modifications to existing solar systems are not exempt from DSA review. The cost exemptions of Section 4.1 above do not apply because this work is an addition, not an alteration. Refer to *IR 16-8: Solar Photovoltaic and Thermal Systems Review and Approval Requirements* for SS and FLS review; refer to *IR 11B-9: Accessibility Requirements for Solar Photovoltaic Systems at School Sites* for AC review.

4.4.2 The addition of any component, regardless of size, type, or cost, to an existing tower or pole, requires SS and FLS review. The cost exemptions of Section 4.1 above do not apply because this work is an addition, not an alteration. Installation of additional cellular equipment or replacement of existing cellular equipment mounted at grade requires review unless the equipment is confined within an enclosed (i.e., fenced) area previously approved and certified by DSA for cell tower equipment, and the equipment is set back from the fence a distance equal to or greater than the height of the equipment.

5. DOCUMENTATION REQUIREMENTS

An entire project or elements within a larger project may be exempt from DSA review, approval, and construction oversight. The exemption may apply to one, some, or all DSA plan review disciplines: SS, FLS, and AC.

5.1 Project Exemption

In accordance with Section 4 above, small alteration or reconstruction projects may be exempt in their entirety. Alternatively, if the project scope consists only of exempt elements per Sections 2 or 3 above, the entire project is exempt.

5.1.1 If the exemption applies to all DSA plan review disciplines, the project need not be submitted to DSA. DSA concurrence of exempt construction work is not required; however, written concurrence may be requested in accordance with *PR 14-02: Exempt Concurrence.*

5.1.2 If the exemption applies to some but not all DSA plan review disciplines, the project shall be submitted to DSA with the exempt plan review disciplines left unchecked on Line 11 of the form *DSA 1: Application for Approval of Plans and Specifications*. Refer to Section 1.2 above for projects requiring only AC plan review and approval.

5.1.3 Certain scope items (e.g., fencing, site work, etc.) listed in Appendices A and C require FLS review and approval to verify that the work does not impact the aspects of FLS compliance listed below. Site plans must clearly identify all fire service features (e.g., fire hydrants, fire department connections, post indicator valves, backflow preventers, etc.) and clarify how access will be provided and maintained for the Local Fire Authority (LFA).

5.1.3.1 Impede egress.

5.1.3.2 Reduce egress width or capacity.

5.1.3.3 Impede or be located in a designated fire apparatus access road.

5.1.3.4 Impede or be located in an emergency access route.

5.1.3.5 Alter fire apparatus access roads as a result of reconfiguring or restriping a parking lot.

5.1.4 If the project applicant believes their project does not impact the aspects of FLS compliance listed in Section 5.1.3 above, the applicant must submit a form *DSA 7: Application for Concurrence: Project is Exempt* and obtain DSA concurrence.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

5.2 Element Exemption

In accordance with Section 2 above, elements within a larger project may be exempt from DSA review, approval, and construction oversight. In these cases, the following requirements apply to the exempt elements, as applicable:

5.2.1 Notes shall be placed on the construction documents stating the element(s) is "NOT PART OF THE DSA APPROVAL". If the exemption applies to some but not all DSA plan review disciplines, the note shall specify which disciplines will not review and approve the element. In the absence of this note, DSA will review the element(s) as described in Section 5.3.2 below.

5.2.2 For an exempt occupiable building, the school district board, superintendent, or facilities director shall prepare and submit a signed letter acknowledging that the building will not be approved nor certified by DSA.

5.3 Voluntary Submission

This interpretation does not preclude a design professional or school district from electing to submit construction documents for exempt work to DSA for review and approval.

5.3.1 Voluntary submission of an exempt project will result in full DSA plan review for code conformance and construction oversight, provided the appropriate fees are paid. Review and approval of voluntary submissions will be in accordance with the governing provisions of the Field Act.

5.3.2 Noncompliance with Section 5.2.1 or 5.2.2 above will result in full DSA plan review for code conformance and construction oversight of any element included on the construction documents submitted to DSA.

5.4 Project Certification

DSA will neither oversee nor certify the construction of exempt projects not submitted to and approved by DSA. Except as noted in Section 4.2.4.3 above, the reporting requirements for certification of construction set forth in the CAC are not required and need not be submitted to DSA. Refer to Section 1.2 above for projects requiring only AC plan review and approval.

REFERENCES:

California Code of Regulations (CCR) Title 24
Part 1: California Administrative Code (CAC): Sections 4-308, 4-309, 4-310, 4-314, 4-315, 4-316, 5-101.
Part 2: California Building Code (CBC): Sections 202, 11B-202.4, 1512.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

APPENDIX A: CONSTRUCTION EXEMPT FROM THE FIELD ACT

	Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
A1.	Lighting poles, antenna towers, and flag poles less than 35 feet tall supported on grade.	**No**	**No**	**No**	2.1.1	
A2.	Lighting poles, antenna towers, and flag poles 35 feet tall or greater supported on grade.	**Yes**	**Yes**	**No**	4.4.2	
A3.	Soil retaining walls less than four feet tall above the top of foundation without surcharge or sloping backfill.	**No**	**No**	**No**	2.1.1	
A4.	Concrete or masonry fences less than six feet tall above grade.	**No**	**Yes**	**Yes**	2.1.1, 5.1.3	
A5.	Ball walls or yard walls less than six feet tall above grade.	**No**	**No**	**Yes**	2.1.1	
A6.	Signs or scoreboards whose apex is less than eight feet above adjacent grade.	**No**	**No**	**No**	2.1.1	AC: Review is required of any signs that must comply with CBC Chapter 11B and variable message signs at transportation stops or in facilities that may be used as emergency shelters or centers.
A7.	Solid clad fences whose apex is less than eight feet above the highest adjacent grade and **not** constructed of concrete or masonry.	**No**	**No**	**Yes**	2.1.1, 5.1.3	
A8.	Open-mesh baseball backstops less than 35 feet tall consisting of cantilevered pole systems.	**No**	**No**	**Yes**	2.1.1	SS and FLS: Open-mesh backstops 8 feet tall or greater clad with windscreens, slats, signs, or similar attachments require review.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
A9. Open-mesh fences less than 35 feet tall or ornamental and security fencing with spaced rails and pickets less than eight feet tall.	**No**	**Yes**	**Yes**	2.1.1, 5.1.3	SS: Open-mesh backstops 8 feet tall or greater clad with windscreens, slats, signs, or similar attachments require review.
A10. Baseball dugouts less than 250 square feet of interior floor area with lightweight roof construction.	**No**	**No**	**Yes**	2.1.1, 5.2.2	
A11. Batting cages consisting of cantilever poles with loose netting sidewalls and roofs.	**No**	**No**	**Yes**	2.1.1, 5.2.2	
A12. Bleachers and grandstands five rows of seats or less with the first row starting at ground level.	**No**	**No**	**Yes**	2.1.1	FLS: Review is required of bleachers and grandstands located in areas enclosed by fencing.
A13. Folding and telescopic seating systems five rows of seats or less.	**No**	**Yes**	**Yes**	2.1.1	
A14. Single-story accessory facilities to athletic fields not exceeding 250 square feet of floor area (e.g., equipment storage, toilets, snack bar, ticket booths).	**No**	**No**	**Yes**	2.1.1, 5.2.2	SS and FLS: Storage of flammable gases or flammable or combustible liquids exceeding that quantity necessary for maintenance purposes and operation of the equipment, voids the exemption.
A15. Playhouses less than 250 square feet of floor area and playground equipment of any size.	**No**	**No**	**Yes**	2.1.1, 2.4, 5.2.2	FLS: Review is required when playhouses or structures are placed within a building protected by automatic sprinkler systems.
A16. Landscape work consisting of vegetation, irrigation and ground cover.	**No**	**No**	**No**	2.1.1	

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
A17. Installation of new or replacement of existing synthetic (artificial turf) play fields or running tracks.	**No**	**No**	**Yes**	2.1.1	
A18. Greenhouses, barns, and material or equipment storage sheds used exclusively for plant or animal production or protection and not used for classroom instruction.	**No**	**No**	**Yes**	2.1.1, 5.2.2	Small groups of students and teachers may enter these structures for short periods of time.
A19. Temporary student-constructed structures not located within a building.	**No**	**No**	**No**	2.1.1, 5.2.2	Upon completion, such structures are not used for school purposes nor intended to be entered by students, teachers, or school employees for school purposes. These structures shall not remain onsite for more than 90 days following completion, unless all provisions of CAC Section 4-310 are met.
A20. Buildings or structures used solely for warehouses and storage buildings, storing buses and minor mechanical equipment or for non-school use where such buildings or structures do not provide facilities for either students or teachers and are not intended to be entered by them for school purposes.	**No**	**No**	**Yes**	2.1.2, 2.2.3, 5.2.2	
A21. Residential dwelling units for teachers or district employees or their family.	**No**	**No**	**No**	2.1.2, 2.2.3, 5.2.2	Refer to *PL 24-01: Workforce Housing Projects and Community College Student Housing Projects Submitted to DSA*.
A22. District-wide administrative buildings on locations separated from school sites.	**No**	**No**	**Yes**	2.1.2	

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
A23. School-based health centers, social services, or support services qualifying under the provisions of Education Code Section 17296, housed in standalone buildings located on school property but not used for school purposes.	**No**	**No**	**Yes**	2.1.2, 2.2.3, 5.2.2	Proof of qualification from another agency(s) and copy of a building permit from the local building official shall be provided to DSA prior to the start of construction. AC: If ANY school district funds are provided, review is required. If completely funded privately, see note above.
A24. Temporary-use Community College building.	**No**	**No**	**Yes**	2.1.1, 5.2.2	

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

APPENDIX B: EXEMPT MAINTENANCE WORK

	Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
B1.	Replacement in-kind of mechanical (including, but not limited to, heating, ventilation, and air-conditioning) and electrical units.	**No**	**No**	**No**	3.2	FLS: Review required where fuel-burning appliances or equipment have direct communication with classrooms. Design professionals shall ensure automatic shutoff of HVAC units is provided where airflow exceeds 2,000 CFM (see California Mechanical Code). AC: Controls require compliance with the operable parts requirements of CBC Chapter 11B.
B2.	Replacement of plumbing fixtures.	**No**	**No**	**Yes**	3.2	
B3.	Cosmetic maintenance work such as painting and wallpapering.	**No**	**No**	**No**	3	
B4.	Replacement in-kind of interior floor coverings.	**No**	**No**	**No**	3	AC: School district is still required to comply with federal law and the CBC which requires *path of travel* improvements to be undertaken.
B5.	Replacement of interior floor coverings: change of floor material.	**No**	**No**	**Yes**	3	
B6.	Reroofing classified as maintenance per Section 3.1 above.	**No**	**No**	**No**	3.1	FLS: For buildings and structures located within a designated hazardous fire area, all roof coverings and assemblies shall have Class A fire hazard classification.
B7.	Weatherization/caulking.	**No**	**No**	**No**	3	
B8.	Window glazing replacement that does not involve the replacement of the window frame assembly nor affect window operability, fire rating, or safety glazing.	**No**	**No**	**No**	3	

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
B9. Window shading devices: window screens (applied to glazing only) and solar shading devices as furnishings and requiring no structural attachment.	**No**	**No**	**No**	3	FLS: Shading devices and films shall not be applied to fire-resistance-rated glazing. AC: Controls require compliance with the operable parts requirements of CBC Chapter 11B.
B10. Lighting upgrade of buildings: re-lamping, ballast replacement, luminaire replacement.	**No**	**No**	**No**	3	AC: Controls require compliance with the operable parts requirements of CBC Chapter 11B.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

APPENDIX C: CONSTRUCTION EXEMPT BASED ON DSA POLICY

	Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
C1.	New or replacement of exterior walking surfaces.	**No**	**Yes**	**Yes**	2.3	
C2.	Installation of new surface over existing parking areas (e.g., asphalt overlays or seal coat) last improved prior to January 1, 2014.	**No**	**Yes**	**Yes**	2.3, 2.5.2, 5.1.3	
C3.	Installation of new surface over existing parking areas with matching striping (e.g., asphalt overlays or seal coat) last improved January 1, 2014 or later.	**No**	**Yes**	**No**	2.3, 5.1.3	
C4.	Removal and replacement of existing parking area surface.	**No**	**Yes**	**Yes**	2.3, 2.5.2, 5.1.3	
C5.	Crossarm or luminaire replacement on light poles greater than 35 feet in height.	**Yes**	**Yes**	**No**	2.3, 4.4.2	
C6.	Installation or alteration of fire alarm systems and emergency voice/alarm communication (EVAC) systems.	**No**	**Yes**	**No**	2.3, 4.1	Reconstruction or alteration of existing fire alarm and EVAC systems below the cost threshold are exempt from DSA review.
C7.	Underground utility replacement in-kind of domestic water piping and sewer (including, but not limited to, septic tanks and leach fields).	**No**	**Yes**	**No**	2.3, 5.1.3	New or replacement domestic water supply wells require review and approval. AC: Paved surfaces that are part of an accessible route are subject to review.
C8.	Site improvements involving only grading, fill placement, paving, storm drains, or other work not supporting structures nor involving their utilities.	**No**	**Yes**	**Yes**	2.3, 5.1.3	Refer to *IR A-9: Site Improvements for School Building Projects* for additional information and requirements.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

	Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
C9.	Installation or alteration of underground fire service water piping for fire hydrants or automatic fire protection systems and exterior aboveground fire protection system components, devices, and appurtenances.	**No**	**Yes**	**No**	2.3	AC: Paved surfaces that are part of an accessible route are subject to review and approval.
C10.	Installation or alteration of underground conduits containing fire alarm system conductors or cables.	**No**	**Yes**	**No**	2.3	AC: Paved surfaces that are part of an accessible route are subject to review and approval.

DSA

7

APPLICATION FOR CONCURRENCE: PROJECT IS EXEMPT

The Division of the State Architect (DSA) reviews and approves plans for and certifies construction projects under its jurisdiction for Title 24 compliance. The scope of DSA's review, construction oversight, inspection and testing requirements depends on the facility type and the scope of the project. Certain types of projects, depending on scope, may be exempt from the requirement to be reviewed, approved, and certified by DSA.

SCHOOL DISTRICT INFORMATION (or state agency)	
Name of District (or state agency):	
School Name (or state facility):	
Director of facilities (or appropriate contact):	
Work Email:	Work Phone:

APPLICANT INFORMATION		
Contact Name:	Date Submitted:	
Firm Name (if not the school district):		
Work Email:	Work Phone:	
Work Address:		
City:	State:	ZIP Code:

Applicant's Statement of Responsibility: I certify, under the penalty of perjury, that I am acting for the school district/state agency in the legal capacity of agent making this application. I further certify that, to the best of my knowledge, the information given on this application is true and correct.

Applicant's Signature:

Is this a Proposition 39 funded energy efficiency improvement project? ☐ Yes ☐ No

Brief description of the project scope (submittal of construction documents will also be required):

DSA USE ONLY			
Exempt Request No.:	File No.:	Date Received:	Fee Received: $
DSA Assessment By:		Date of Assessment:	

☐ Project is exempt from DSA review, approval and construction oversight. Project must fully comply with all applicable design, construction, and inspection provisions contained in California Code of Regulations, Title 24:

☐ As adopted and amended by DSA;

☐ As adopted by the California Building Standards Commission.

☐ Project is NOT exempt.

DSA approval is required for	☐ Structural Safety	☐ Fire & Life Safety	☐ Accessibility

ATTACHMENT B1

OFFICE OF PUBLIC SCHOOL CONSTRUCTION
STAKEHOLDER MEETING
September 3, 2026

PROPOSED REVISIONS TO THE FACILITY INSPECTION TOOL

PURPOSE

To continue to discuss and receive stakeholder feedback regarding potential revisions to the Facility Inspection Tool (FIT) as a result of audit recommendations issued by the California State Auditor (State Auditor) in November 2024.

AUTHORITY

See Attachment B1a.

DESCRIPTION

This report continues discussion of the FIT and potential revisions related to recommendations issued by the State Auditor. Prior stakeholder meetings on this topic were held on October 30, 2025 and June 25, 2026. This report addresses feedback that was not answered at the June 25 meeting, responds to stakeholder feedback following that meeting, and provides additional considerations and potential updates related to the State Auditor's recommendations.

In this item, the Office of Public School Construction (OPSC) provides examples of potential changes to the FIT. At this time OPSC has not chosen which recommendations to move forward. They are presented for discussion purposes only.

BACKGROUND

The FIT is a visual inspection tool to aid in assuring that all California school children have access to clean, safe, and functional school facilities. The FIT is comprised of eight categories to create a score or ranking. These eight categories include the 15 components outlined in Education Code (EC) Section 170002(d)(1). The FIT is an optional tool for use by school districts for purposes of evaluating facilities.

Stakeholder Feedback
On June 25, 2026, OPSC held the second public meeting to discuss the recommendations issued by the State Auditor related to updating the FIT to increase the accuracy of FIT reporting. OPSC seeks stakeholder input on any topics presented in this item. The full text of the prior stakeholder meeting item can be found at the link below:
June 25, 2026 OPSC FIT Stakeholder Meeting

The recording from the stakeholder meeting is available at the link below:
June 25, 2026 OPSC FIT Stakeholder Meeting - Recording

STAFF ANALYSIS/DISCUSSION

Summary of Stakeholder Feedback

OPSC received multiple comments from the previous stakeholder meeting regarding the State Auditor's recommendations to update the FIT. OPSC appreciates the stakeholder comments and feedback on this subject. The following table provides a summary of the comments and OPSC's responses.

The full text of stakeholder feedback may be found on Attachment B1f.

Stakeholder Feedback	OPSC Response
1. A stakeholder suggested that OPSC clearly define the purpose of the FIT before expanding its scope, noting that the tool has traditionally been an annual check on whether schools are clean, safe, and in good repair. The stakeholder cautioned that the proposed changes would turn the FIT into a full facility condition assessment which would require more expertise, time, and cost—and argued that inspectors should focus solely on observable issues that are not overseen by other agencies. The stakeholder also recommended clarifying whether use of any new form would be required or optional, and to continue using the FIT to document obvious health and safety concerns, while leaving technical compliance evaluations to the appropriate authorities.	**1.** OPSC acknowledges that the statutory purpose of the FIT has not changed. The proposed amendments to the FIT are largely in response to the State Auditor's recommendations to potentially improve the tool. As development of proposed changes proceeds, OPSC will consider additional notations to the FIT to distinguish between required and optional elements. As a result of the State Auditor's recommendations, OPSC proposes the Hazardous Materials Detail Sheet and the Mechanical Systems portions as optional components of the FIT for consideration.
2. A stakeholder indicated that expanding the FIT as presented may require districts to seek third-party consultants or specialized inspectors. The stakeholder noted that increasing the number of reportable deficiencies without providing associated funding to address those deficiencies, creates a financial obligation for districts.	**2.** OPSC acknowledges the stakeholder's feedback regarding the proposed expansion of the FIT as it relates to the expansion of deficiency categories. OPSC also acknowledges that the Facilities Master Plan may serve as an informative tool for districts to document capital planning and

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
2. (cont.) The stakeholder suggested that rather than expanding the FIT, OPSC should consider using the Facilities Master Plan required under Proposition 2, or existing SAB forms related to deferred maintenance, to document long-term capital deficiencies and deferred maintenance needs, which would allow districts to identify future SFP funding opportunities.	**2. (cont.)** deferred maintenance needs, as well as identify appropriate funding opportunities for districts' varying facility needs. As noted by the State Auditor, OPSC believes that all deficiencies should be noted, regardless of whether funding exists, immediately to address a deficiency. The FIT has space for comments from the school district to allow school districts to speak to plans to address the deficiency.
3. A stakeholder requested that OPSC consider allowing districts to document major deficiencies that have been identified during an assessment, to then be prioritized and programmed for future correction.	**3.** This suggestion aligns with OPSC's draft response to the State Auditor's recommendation of "Guidance for Scoring Individual Locations with Multiple Deficiencies in the Same Section." OPSC stated that when multiple deficiencies are identified, evaluators have the option to indicate an action plan within the comment section available at the bottom of each respective Evaluation Detail within Part-IIa of the FIT for any specific building/areas that receive one or more Deficiency scores, and that districts may also opt to compare year-to-year assessments. However, OPSC acknowledges that the FIT is a tool for purposes of a visual, point-in-time inspection, and emphasizes that this response to the State Auditor's recommendations is an optional feature districts may use to track year-to-year inspections. This option uses existing sections of the FIT within the Evaluation Detail page of "District's Plan to Address" and "Deficiencies Noted in Prior Year."

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	3. (cont.) As such, OPSC notes that any stakeholders who wish to document major deficiencies that have been prioritized and programmed for future correction may do so under the existing "District's Plan to Address" section of the FIT.
4. A stakeholder mentioned that many recommendations made by the State Auditor pertain to an inconsistent interpretation of existing standards. The stakeholder recommended an emphasis on statewide training, inspector calibration, quality assurance, and improved guidance before expanding inspection criteria. Additionally, the stakeholder suggested that if the inspection criteria become more technical, statewide training and certifications should be made available for district and county office inspectors to improve consistency and reduce subjective interpretation. The stakeholder acknowledged that OPSC may not have the technical expertise or resources to evaluate building systems, but emphasized the necessity of training related to areas subject to inspection, what qualifies as a deficiency, and how to use the form to report information accurately and calculate the score.	**4.** OPSC acknowledges the stakeholder's feedback regarding the suggestion for additional training and guidance if additional inspection complexity may be included in an updated FIT. The FIT is an optional tool for districts to use to evaluate facilities and may be used in whole, or partially for only for the most pertinent portions, for example. Another option is for a district to use a locally developed evaluation instrument that meets the minimum evaluation criteria outlined in EC Section 17002(d)(1)(A) through (d)(1)(S). OPSC does not seek to increase complexity of the FIT in a manner that would necessitate statewide training and certifications with respect to the FIT. The FIT is a non-expert visual inspection tool designed to meet the requirements of EC Section 17002(d)(1)(A) through (d)(1)(S). Inspections using the FIT should be able to be conducted without specialized technical expertise.
5. A stakeholder recommended that OPSC clearly distinguish between changes in facility condition and changes in evaluation methodology, as public reports should be able to explain when ratings change due to more rigorous inspection standards	**5.** OPSC acknowledges that it may be beneficial to include disclaimer language regarding any changes to the FIT to distinguish any year-to-year rating changes that may occur as a result of the FIT evaluation changes, rather than as a result of significant

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
5. (cont.) rather than deterioration of facilities. Additionally, the stakeholder expressed concern that publicly reported declines in the rating of facilities within a FIT assessment due to evaluation methodology changes may pose unnecessary public concern regarding school safety and facility conditions. The stakeholder recommended that any evaluation methodology amendments to the FIT should be accompanied by communication that rating changes are attributable to revised standards rather than declining conditions of facilities.	**5. (cont.)** year-to-year changes in facility conditions.
6. In response to the Hazardous Materials Detail sheet that OPSC included as part of the previous stakeholder meeting on this topic, a stakeholder noted that hazardous materials are already regulated by other agencies. The stakeholder recommended that OPSC consider partnering with agencies such as the California Department of Education, Department of Toxic Substances Control, and the State Fire Marshall to develop statewide training, guidance documents, and self-assessment checklists rather than expanding FIT inspection requirements.	**6.** OPSC notes that the Hazardous Materials Detail sheet was presented as a discussion item to provide an example of how the FIT could be expanded, using the existing Cleanliness detail as a guide. OPSC acknowledges the stakeholder's feedback related to hazardous materials and the agencies that regulate them, and notes that while OPSC does not anticipate developing comprehensive training in partnership with these state agencies, use of a potential Hazardous Materials Detail sheet for the FIT could be optional.
7. A stakeholder indicated the potential recommendations of defined deficiency ratings, expanded guidance and examples, improved documentation of deficiencies and corrective actions, refinements to the scoring methodology, and the	**7.** Due to multiple stakeholders' support for section reporting rather than category-level reporting, OPSC has developed a potential amended FIT reflective of these recommendations, which may be seen on Attachment B1c.

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
7. (cont.) optional Hazardous Materials Detail Sheet would improve the clarity, consistency, and accuracy of facility inspections. Multiple stakeholders expressed support for the implementation of the State Auditor's recommendation for a scoring system that removes the aggregation of FIT sections into category-level reporting.	
8. A stakeholder recommended replacing the "Mechanical Systems" heading with "Ventilation/Temperature," and proposed specific additional adjustments to wording in this section intended to remove ambiguity and promote completeness and uniformity. The stakeholder requested that OPSC formally recommend these changes to the FIT.	**8.** OPSC appreciates this suggested language and has included it in this item for consideration within both Attachments B1c and B1d for illustrative purposes to obtain stakeholder feedback as to whether or not a potential FIT update should include this amendment. OPSC notes that the suggested language in section ii was slightly revised to remove a portion that appeared duplicative with the content of section iii.
9. A stakeholder previously requested the addition of disclaimer language regarding the FIT's limitations, given its use as an input in School Accountability Report Cards (SARCs). In response to OPSC's invitation to suggest specific disclaimer language for consideration, the stakeholder suggested: "FIT results may be used as an input in SARCs, which provide information about school conditions to the public (EC Section 33126). However, the FIT is, by design, a non-expert, visual inspection tool. As such, it may fail to identify deficiencies in school facilities, including ones that affect health and safety, that are not ascertainable by	**9.** OPSC has made conforming edits to the potential FIT on Attachment B1c for stakeholder consideration to reflect disclaimer language regarding the FIT's limitations. This disclaimer language supports that the FIT is an optional tool for a visual inspection that should be able to be conducted by a non-expert. OPSC welcomes additional feedback on the inclusion of this disclaimer on an updated version of the FIT.

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
9. (cont.) non-experts or by visual inspection.	
10. Regarding guidance for specialized learning environments, a stakeholder suggested that makerspaces are included in this guidance.	**10.** Given that the general term "specialized learning environments" may be inclusive of makerspaces. OPSC intends that makerspaces would be included within this potential guidance. OPSC has prepared additional guidance with respect to specialized learning environments, as seen on Attachment B1e. This is further expanded as a potential resource for FIT inspectors and interested parties in the Staff/Analysis section below.
11. A stakeholder provided positive feedback regarding instructing evaluators to indicate an action plan in the comments for individual locations that contain multiple deficiencies.	**11.** OPSC notes that currently, this is an option that districts have to track multiple deficiencies, but it is not a required element of completing the FIT. As part of the stakeholder process, OPSC can consider making it a required element. Within the existing FIT, the Evaluation and Cleanliness Detail sheets have sections to include comments, a plan to address, and any deficiency noted in a prior year. The Totals and Ranking sheet of the existing FIT includes a section in which the inspector can leave comments and a rating explanation, if they choose to do so.
12. A stakeholder noted that the State Auditor recommended that the FIT differentiate between "cosmetic deficiencies, minor deficiencies, moderate deficiencies, and extreme deficiencies." The stakeholder requested clarification as to why the OPSC proposal differed from the State Auditor's recommended	**12.** Multiple stakeholders noted that additional deficiency ratings would be beneficial to the FIT. The last meeting introduced the concept of an additional Minor Deficiency rating. Due to feedback, OPSC has included in this item both a "Cosmetic Deficiency" rating as well as "Minor Deficiency" rating, distinguishing the two, for stakeholder

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
12. (cont.) proposals, merging cosmetic and minor deficiencies and using "deficiencies" instead of "moderate deficiencies." Additionally, the stakeholder suggested that a scale of "cosmetic deficiencies, moderate deficiencies, serious deficiencies, and extreme deficiencies" would be more instructive, as it distinguishes between cosmetic and functional deficiencies and allows for more meaningful differentiation of severity.	**12. (cont.)** consideration. Further information with respect to the potential inclusion of these ratings may be found in the further Staff Analysis/Comments section of this item.
13. A stakeholder suggested that OPSC clarify intended areas for use of the Hazardous Materials Detail worksheet, noting that substantial portions of the potential worksheet appear to be directed at specialized areas, whereas the State Auditor's report indicated that hazardous materials were found in elementary school classrooms.	**13.** OPSC notes that there could be many circumstances in which hazardous materials could be found in standard classrooms and not just in specialized spaces. One example mentioned by the State Auditor was that in elementary school classrooms, items such as Lysol cans or cleaning products left out on a counter may fall under the potential section of "Proper Hazardous Materials Storage" on Part-IIc of the FIT, rather than just distinctly for specialized areas.

Summary of the State Auditor's Recommended Changes to the FIT
On Attachment B1b, OPSC has prepared a chart that compares the State Auditor's recommendations from the November 2024 Audit Report, OPSC's response at the June 25, 2026 stakeholder meeting to these recommendations, and subsequent stakeholder feedback pertaining to these recommendations and responses.

Overall, stakeholders responded to staff's recommendations by indicating that the FIT should focus on easily observable facility conditions rather than complex technical standards that require specialized training and may fall under other agencies' jurisdictions. Stakeholders mentioned that revised evaluation standards may lead to lower facility ratings, which may be misinterpreted by the public as further deteriorating facilities. Stakeholders also mentioned the need for statewide coordination to develop

STAFF ANALYSIS/DISCUSSION (cont.)

training programs for current and prospective inspectors, as expanded inspection requirements could pose challenges for districts with limited resources.

Potential Amendments to the FIT
Below are some potential amendments to the FIT, based upon the State Auditor's recommendations and stakeholder feedback.

Potential Addition to Encourage Comments on Facilities Evaluated
In light of feedback, OPSC is considering proposed amendments to the FIT to highlight the benefits of using the comment sections to add greater context for someone reading the FIT, regardless of whether or not a deficiency was observed. For instance, if the inspector observes that the HVAC System works and cleaning supplies are properly stored, the inspector will indicate these observations in the Comments field. Should the observations result in the need for additional space, inspectors can continue their observations/comments on a separate sheet of paper as needed.

OPSC requests stakeholder feedback regarding this potential inclusion in the FIT.

Part III - Proposal to Amend Category Totals to Section Totals
At the June 25, 2026 stakeholder meeting, in accordance with the State Auditor's recommendations, OPSC presented an option to stakeholders to update the scoring system and remove the aggregation of FIT sections in category-level reporting and clarify how this change may affect overall scores.

OPSC received positive feedback with respect to this change and is thus proposing for stakeholder consideration an updated FIT with Section Totals and Ranking instead of Category Totals and Ranking. Examples using actual FIT assessment data will be presented at a future meeting for review and to determine whether the change will significantly impact total ranking. These amendments are included in Attachment B1c.

Expansion of Deficiency Ratings
The State Auditor recommended that OPSC adopt a broader range of deficiency ratings, which included cosmetic deficiencies, minor deficiencies, moderate deficiencies, and extreme deficiencies. Based on these recommendations and in conjunction with stakeholder feedback from the prior meeting, OPSC prepared an expansion to the Part II, Evaluation Detail section of the FIT's User Instructions, shown below and on Attachment B1c for consideration. Additions are underlined for reference.

STAFF ANALYSIS/DISCUSSION (cont.)

OK	**No Deficiency – Good Repair:** Mark "OK" if all statements in the Good Repair Standard are true, and there is no indication of a deficiency in the specific ~~category~~ section.
CD	**Cosmetic Deficiency:** Mark "CD" if one or more statement(s) in the Good Repair Standard for the specific section is not true if the deficiency is cosmetic in nature and does not pose any functionality issues. For example, there are stained curtains, rugs, scratch marks, and otherwise non-hazardous damage that poses no functionality issues and is distinctly appearance-based. These conditions would be a "Cosmetic Deficiency."
MD	**Minor Deficiency:** Mark "MD" if one or more statement(s) in the Good Repair Standard for the specific category is not true, and if the deficiency is minor, but could affect functionality if left damaged, such that it will require maintenance in the future. For example, there is cracked concrete that poses no tripping hazard (i.e. the ground is not elevated). This condition would be a "Minor Deficiency."
D	**Moderate Deficiency:** Mark "D" if one or more statement(s) in the Good Repair Standard for the specific category is not true and does not fit into the CD or MD category, or if there is other clear evidence of the need for repair or corrective action before it becomes a health and safety issue.
X	**Extreme Deficiency:** Indicate "X" if the area has a deficiency that is considered an "Extreme Deficiency" in the Good Repair Standard or there is a condition that qualifies as an extreme deficiency but is not noted in the Good Repair Standard and poses a health or safety issue. In specialized learning environments that have specialized equipment, any materials or conditions that may pose an immediate health and safety issue that are not locked or stored away properly should be considered an "Extreme Deficiency."
NA	**Not Applicable:** If the Good Repair Standard category (building system or component) does not exist in the area evaluated, mark "NA."

The first amendment since the last meeting is the inclusion of the "Cosmetic Deficiency (CD)" rating, which is intended to document deficiencies that are in appearance only, with no impact to functionality at present or in the future. Examples of a CD would be stained rugs or curtains, scratch marks, and otherwise non-hazardous damage that poses no functionality issues and is distinctly appearance-based.

The second amendment since the last meeting is the modification of the description of the "Minor Deficiency (MD)" rating, which is intended to establish clarification between a

STAFF ANALYSIS/DISCUSSION (cont.)

"CD," "MD," and "Moderate Deficiency (D)" rating. The inclusion of this deficiency rating is to document deficiencies that are minor and not just cosmetic in nature, and could affect functionality if left deferred, such that the area evaluated will require maintenance in the future. For example, if at the time of the evaluation, there is cracked concrete that poses no tripping hazard, or there is peeling paint in the hallway, these would fall under the category of "MD."

Next, the "Deficiency" category could be called "Moderate Deficiency (D)." This change is intended to ensure that it is distinct from a "CD" and an "MD" and also aligns with the State Auditor's recommendations. This deficiency rating is intended to identify deficiencies with a clear need for repair or corrective action that cannot be deferred and do not pose a health or safety issue to staff or students at the time of evaluation but could if left deferred.

Finally, the "Extreme Deficiency (X)" category has been updated to document deficiencies that pose an immediate health or safety issue. Regarding specialized learning environments, such as woodshops, automotive shops, science laboratories, or makerspaces, these environments often have equipment that if not stored properly, could pose a health and safety issue to staff and students. Therefore, additional guidance is presented here to accommodate specialized learning environment materials that may pose an immediate health and safety issue and should thus be evaluated as an "X."

Update Mech/HVAC Section to Ventilation/Temperature
In accordance with stakeholder feedback number 8, the stakeholder suggested amending the title of the "Mech/HVAC" section to "Ventilation/Temperature." OPSC has reflected this proposed change in Attachments B1c and B1d, and welcomes stakeholder feedback on this potential change.

Update Gas Leaks Section to Gas Systems
Although it was not requested by a stakeholder, OPSC noticed that the title of the first section is Gas Leaks. To better represent what is being assessed, OPSC proposes to amend the title to Gas Systems throughout the Form. The FIT user should assess the Gas System as to whether or not a leak exists. This proposed change is reflected in Attachment B1c.

Considerations for Weighting Methodology of Section Totals and Ranking
Stakeholders indicated that if OPSC proceeds with incorporating new deficiency ratings, the existing weighting methodology must be addressed and amended to be inclusive of the new deficiency rating(s). OPSC concurs that new deficiency ratings would require amending the current weighting methodology that calculates the percentage for the site's ranking.

STAFF ANALYSIS/DISCUSSION (cont.)

OPSC has prepared a few potential weighting methodology amendments for consideration and seeks additional stakeholder feedback regarding this element.

In accordance with EC Section 17002(d)(2), "…the...evaluation instrument and local evaluation instruments that meet the minimum criteria of this subdivision shall include a system that will evaluate each facility…on a scale of "good," "fair," or "poor," as developed by the Office of Public School Construction, and provide an overall summary of the conditions at each school on a scale of "exemplary," "good," "fair," or "poor."

As the evaluation system criteria is statutorily based, OPSC has developed a few potential weighting methodology amendments in light of the newly proposed "CD" and "MD" deficiency rating options.

Option 1
Within the Section Totals and Ranking, it would indicate the following:

Percent of System in Good Repair
Number of ("OK"s + "CD"s) divided by
(Total Areas – "NA"s)

Option 2
Within the Section Totals and Ranking, it would indicate the following:

Percent of System in Good Repair
Number of ("OK"s + "CD"s + "MD"s)
divided by
(Total Areas – "NA"s)

Option 3
Within the Section Totals and Ranking, it would indicate the following:

Percent of System in Good Repair
Number of "OK"s divided by
(Total Areas – "NA"s)

Rank Percentages
Then, with respect to the Rank, due to the inclusion of "CD" or "MD" within the potential ratings, OPSC has prepared a potential update to the Rank percentages affiliated with "Good," "Fair," or "Poor."

Summary of Overall Potential Amendments in Attachment B1c
Notable amendments to the potential revised FIT in Attachment B1c include the following:

STAFF ANALYSIS/DISCUSSION (cont.)

- **General Information** section updated with potential disclaimer language provided by stakeholder feedback.
- **User Instructions Part II, Evaluation Detail and Part III** sections are updated with potential deficiency ratings of “CD” and “MD”, and updated language to reference 15 categories rather than sections. Additionally, language has been incorporated that provides inspectors information with respect to specialized classrooms and additional considerations related to those specific areas.
- Hazardous Materials Detail Sheet (optional) included – updated instructions presented at the June 25 stakeholder meeting are included in this iteration of the potential FIT.
- **Parts I, IIa. and III** are updated to reflect the proposed title change for the Gas Leaks section of the FIT to Gas Systems.

Other Additional Materials

Specialized Learning Environments
In response to the State Auditor’s recommendations, OPSC has prepared draft language that provides guidance for evaluating specialized learning environments, such as woodshops, welding shops, science laboratories, makerspaces, and agricultural areas, within the User Instructions Part II, Evaluation Detail section. The following text could be added to this section:

- **Specialized Classrooms** may include, but are not limited to, classrooms and adjoining learning environments for woodshops, welding shops, science laboratories, makerspaces, and agricultural areas. These areas should be evaluated within the criteria of the fifteen sections. Additional considerations are that these learning spaces are often equipment intensive, containing materials and tools that are not typically present in a traditional classroom. Learning spaces may be indoors or outdoors. Inspectors should ensure that equipment and specialized materials observed in these areas evaluated are safely stored and that there are no observable hazards.

This potential additional language is included in Attachment B1c for stakeholder reference.

OPSC FIT Guidelines
At the previous meeting, OPSC presented the concept of a potential resource guide that could expand on FIT assessment instructions, inclusive of specialized learning environments, such as woodshops, welding shops, science laboratories, makerspaces, and agricultural areas.

OPSC has not received feedback specifically related to this potential resource guide. To prompt discussion, OPSC has prepared a draft potential resource guide for

STAFF ANALYSIS/DISCUSSION (cont.)

consideration, including guidance for Specialized Learning Environments, particularly as it relates to equipment conditions. These potential guidelines may be seen on Attachment B1e.

These potential guidelines may assist a FIT inspector to evaluate the condition of school facilities and provide examples of what constitutes a designated deficiency rating, i.e., the potential "CD," "MD," and "D" ratings, as well as the existing "X" deficiency rating. OPSC has included a disclaimer that this guidebook is prepared for illustrative purposes and may not cover all possible situations. Additionally, in each respective section, pictures have been included that reflect examples of specific deficiencies. OPSC anticipates developing appropriate captions at a future meeting to further provide clarity with respect to potential deficiencies.

OPSC has also prepared a flowchart, located in the Appendix, to assist users with determining a deficiency, intended as a reference for inspectors to differentiate between the four potential deficiency ratings.

OPSC requests stakeholder feedback on this potential resource guide.

NEXT STEPS

OPSC invites stakeholder input on the specific FIT revisions recommended by the State Auditor. OPSC will review all feedback and will schedule an additional stakeholder meeting for further discussion by notifying all interested parties through our email notification system. If you would like to subscribe to our email list, please visit this link:

https://public.govdelivery.com/accounts/CADGS/subscriber/topics?qsp=CADGS_4

Any stakeholder wishing to provide feedback should email OPSCCommunications@dgs.ca.gov by close of business on **Friday, September 18, 2026**.

ATTACHMENT B1a

AUTHORITY

Education Code (EC) Section 1240

The county superintendent of schools shall do all of the following:
(a) Superintend the schools of that county.
(b) Maintain responsibility for the fiscal oversight of each school district in that county pursuant to the authority granted by this code.
(c) (1) Visit and examine each school in the county at reasonable intervals to observe its operation and to learn of its problems. The county superintendent of schools annually may present a report of the state of the schools in the county, and of the county office of education, including, but not limited to, observations from visiting the schools, to the board of education and the board of supervisors of the county.
(2) (A) (i) Commencing with the 2021–22 fiscal year, the Superintendent shall identify a list of schools, which shall include charter schools, for which the county superintendent, or a designee, shall inspect annually, and about which the county superintendent, or a designee, shall submit an annual report, at a regularly scheduled November board meeting, to the governing board of each school district under the jurisdiction of the county superintendent, the county board of education of that county, and the board of supervisors of that county, that describes the state of the schools in the county. The list established in the 2021–22 fiscal year shall also be used as the list established in the 2022–23 and 2023–24 fiscal years. The list of schools established pursuant to this section shall be reestablished in the 2024–25 fiscal year and again every three fiscal years thereafter. Each list shall be established in accordance with clause (ii), and shall be used for inspections beginning the following fiscal year.
(ii) The list of schools pursuant to clause (i) shall be compiled as follows:
(I) The Superintendent shall include on the list all schools that were most recently identified for comprehensive support and improvement and additional targeted support and improvement pursuant to the federal Every Student Succeeds Act (Public Law 114-95) or identified as low performing under the federal Elementary and Secondary Education Act of 1965 (Public Law 89-10), or any subsequent amendments to that act. For the list established in the 2021–22, 2022–23, and 2023–24 fiscal years, the Superintendent shall use the list of schools identified in the 2019–20 fiscal year for comprehensive support and improvement and for additional targeted support and improvement.
(II) The Superintendent shall include on the list all schools where 15 percent or more of the teachers are holders of a permit or certificate, such as a temporary or short-term permit, a substitute permit, a waiver, an intern credential, or any other authorization that is a lesser certification than a preliminary or clear California teaching credential. With the exception of alternative schools, all schools within a local educational agency that fail to meet the requirements of Sections 44258.9 and 60900 shall be included on the list for the applicable reporting cycle.
(III) The list of schools compiled pursuant to clause (i) shall exclude alternative schools within the meaning of subdivision (d) of Section 52052 and other schools accepted for participation in the Dashboard Alternative School Status program by the department.
(iii) The annual report shall include the determinations for each school made by the county superintendent, or the county superintendent's designee, regarding the status of all of the circumstances listed in subparagraph (E) and teacher misassignments and teacher vacancies, as described in Section 44258.9, and the county superintendent, or the county superintendent's designee, shall use a standardized template to report the circumstances

listed in subparagraph (E) and teacher misassignments and teacher vacancies, as described in Section 44258.9, unless the current annual report being used by the county superintendent, or the county superintendent's designee, already includes those details with the same level of specificity that is otherwise required by this subdivision.
(B) The county superintendent of the Counties of Alpine, Amador, Del Norte, Mariposa, Plumas, and Sierra, and the City and County of San Francisco shall contract with another county office of education or an independent auditor to conduct the required visits and make all reports required by this paragraph.
(C) On a quarterly basis, the county superintendent, or the county superintendent's designee, shall report the results of the visits and reviews conducted that quarter to the governing board of the school district at a regularly scheduled meeting held in accordance with public notification requirements. The results of the visits and reviews shall include the determinations of the county superintendent, or the county superintendent's designee, for each school regarding the status of all of the circumstances listed in subparagraph (E) and teacher misassignments and teacher vacancies, as described in Section 44258.9. If the county superintendent, or the county superintendent's designee, conducts no visits or reviews in a quarter, the quarterly report shall report that fact.
(D) The visits made pursuant to this paragraph shall be conducted at least annually and shall meet the following criteria:
(i) Minimize disruption to the operation of the school.
(ii) Be performed by individuals who meet the requirements of Section 45125.1.
(iii) Consist of not less than 25 percent unannounced visits in each county. During unannounced visits in each county, the county superintendent shall not demand access to documents or specific school personnel. Unannounced visits shall only be used to observe the condition of school repair and maintenance, and the sufficiency of instructional materials, as defined by Section 60119.
(E) The priority objective of the visits made pursuant to this paragraph shall be to determine the status of all of the following circumstances:
(i) Sufficient textbooks, as defined in Section 60119 and as specified in subdivision (i).
(ii) The condition of a facility that poses an emergency or urgent threat to the health or safety of pupils or staff, as described in school district policy or paragraph (1) of subdivision (c) of Section 17592.72.
(iii) The accuracy of data reported on the school accountability report card with respect to the availability of sufficient textbooks and instructional materials, as defined by Section 60119, and the safety, cleanliness, and adequacy of school facilities, including good repair, as required by Sections 17014, 17032.5, 17070.75, and 17089.
(F) The county superintendent may make the status determinations described in subparagraph (E) during a single visit or multiple visits. In determining whether to make a single visit or multiple visits for this purpose, the county superintendent shall take into consideration factors such as cost-effectiveness, disruption to the schoolsite, deadlines, and the availability of qualified reviewers.
(G) If the county superintendent determines that the condition of a facility poses an emergency or urgent threat to the health or safety of pupils or staff as described in school district policy or paragraph (1) of subdivision (c) of Section 17592.72, or is not in good repair, as specified in subdivision (d) of Section 17002 and required by Sections 17014, 17032.5, 17070.75, and 17089, the county superintendent, among other things, may do any of the following:

(i) Return to the school to verify repairs.
(ii) Prepare a report that specifically identifies and documents the areas or instances of noncompliance if the school district has not provided evidence of successful repairs within 30 days of the visit of the county superintendent or, for major projects, has not provided evidence that the repairs will be conducted in a timely manner. The report may be provided to the governing board of the school district. If the report is provided to the school district, it shall be presented at a regularly scheduled meeting held in accordance with public notification requirements. The county superintendent shall post the report on the internet website of the county superintendent. The report shall be removed from the internet website when the county superintendent verifies the repairs have been completed.
(H) For schools that are identified on the list established in the 2024–25 fiscal year pursuant to subparagraph (A), and only in the fiscal years in which that list is used, a county superintendent shall complete the textbook and instructional materials review conducted for purposes of this paragraph and subparagraph (A) of paragraph (3) of subdivision (i) by the eighth week of the school year. The county superintendent shall prioritize reviewing, within the first four weeks of the school year where practicable, schools for which the county superintendent has received information from a survey, a complaint filed pursuant to Section 35186, or any other reliable source that the school does not have sufficient textbooks, as defined in Section 60119 and as specified in subdivision (i), or that a facility of the school poses an emergency or urgent threat to the health or safety of pupils or staff as described in school district policy or paragraph (1) of subdivision (c) of Section 17592.72, or is not in good repair, as specified in subdivision (d) of Section 17002 and required by Sections 17014, 17032.5, 17070.75, and 17089.
…

EC Section 17002

The following terms wherever used or referred to in this chapter, shall have the following meanings, respectively, unless a different meaning appears from the context:
(a) “Apportionment” means a reservation of funds necessary to finance the cost of any project approved by the board for lease to an applicant school district.
(b) “Board” means the State Allocation Board.
(c) “Cost of project” includes, but is not limited to, the cost of all real estate property rights, and easements acquired, and the cost of developing the site and streets and utilities immediately adjacent thereto, the cost of construction, reconstruction, or modernization of buildings and the furnishing and equipping, including the purchase of educational technology hardware, of those buildings, the supporting wiring and cabling, and the technological modernization of existing buildings to support that hardware, the cost of plans, specifications, surveys, and estimates of costs, and other expenses that are necessary or incidental to the financing of the project. For purposes of this section, “educational technology hardware” includes, but is not limited to, computers, telephones, televisions, and video recording equipment.
(d) (1) “Good repair” means the facility is maintained in a manner that assures that it is clean, safe, and functional as determined pursuant to a school facility inspection and evaluation instrument developed by the Office of Public School Construction and approved by the board or a local evaluation instrument that meets the same criteria. Until the school facility inspection and evaluation instrument is approved by the board, “good repair” means the facility is

maintained in a manner that assures that it is clean, safe, and functional as determined by the interim evaluation instrument developed by the Office of Public School Construction or a local evaluation instrument that meets the same criteria as the interim evaluation instrument. The school facility inspection and evaluation instrument and local evaluation instruments that meet the minimum criteria of this subdivision shall not require capital enhancements beyond the standards to which the facility was designed and constructed. In order to provide that school facilities are reviewed to be clean, safe, and functional, the school facility inspection and evaluation instrument and local evaluation instruments shall include at least the following criteria:

(A) Gas systems and pipes appear and smell safe, functional, and free of leaks.

(B) Mechanical systems, including heating, ventilation, and air-conditioning systems, satisfy the following:

(i) Are functional and unobstructed.

(ii) Appear to supply adequate amount of air to all classrooms, work spaces, and facilities.

(iii) Maintain interior temperatures within normally acceptable ranges.

(C) Doors and windows are intact, functional, and open, close, and lock as designed, unless there is a valid reason they should not function as designed.

(D) Fences and gates are intact, functional, and free of holes and other conditions that could present a safety hazard to pupils, staff, or others. Locks and other security hardware function as designed.

(E) Interior surfaces, including walls, floors, and ceilings, are free of safety hazards from tears, holes, missing floor and ceiling tiles, torn carpet, water damage, or other cause. Ceiling tiles are intact. Surfaces display no evidence of mold or mildew.

(F) Hazardous and flammable materials are stored properly. No evidence of peeling, chipping, or cracking paint is apparent. No indicators of mold, mildew, or asbestos exposure are evident. There is no apparent evidence of hazardous materials that may pose a threat to the health and safety of pupils or staff.

(G) Structures, including posts, beams, supports for portable classrooms and ramps, and other structural building members appear intact, secure, and functional as designed. Ceilings and floors are not sloping or sagging beyond their intended design. There is no visible evidence of severe cracks, dry rot, mold, or damage that undermines structural components.

(H) Fire sprinklers, fire extinguishers, emergency alarm systems, and all emergency equipment and systems appear to be functioning properly. Fire alarm pull stations are clearly visible. Fire extinguishers are current and placed in all required areas, including every classroom and assembly area. Emergency exits are clearly marked and unobstructed.

(I) Electrical systems, components, and equipment, including switches, junction boxes, panels, wiring, outlets, and light fixtures, are securely enclosed, properly covered and guarded from pupil access, and appear to be working properly.

(J) Lighting appears to be adequate and working properly. Lights do not flicker, dim, or malfunction, and there is no unusual hum or noise from light fixtures. Exterior lights onsite appear to be working properly.

(K) No visible or odorous indicators of pest or vermin infestation are evident.

(L) Interior and exterior drinking fountains are functional, accessible, and free of leaks. Drinking fountain water pressure is adequate. Fountain water is clear and without unusual taste or odor, and moss, mold, or excessive staining is not evident.

(M) Restrooms and restroom fixtures satisfy the following:

(i) Are functional.
(ii) Appear to be maintained and stocked with supplies regularly.
(iii) Appear to be accessible to pupils during the schoolday.
(iv) Appear to be in compliance with Section 35292.5.
(N) The sanitary sewer system controls odor as designed, displays no signs of stoppage, backup, or flooding, in the facilities or on school grounds, and appears to be functioning properly.
(O) Roofs, gutters, roof drains, and downspouts appear to be functioning properly and are free of visible damage and evidence of disrepair when observed from the ground inside and outside the building.
(P) The school grounds do not exhibit signs of drainage problems, such as visible evidence of flooded areas, eroded soil, water damage to asphalt playgrounds or parking areas, or clogged storm drain inlets.
(Q) Playground equipment and exterior fixtures, seating, tables, and equipment are functional and free of significant cracks, trip hazards, holes, deterioration that affects functionality or safety, and other health and safety hazards.
(R) School grounds, fields, walkways, and parking lot surfaces are free of significant cracks, trip hazards, holes, deterioration that affects functionality or safety, and other health and safety hazards.
(S) Overall cleanliness of the school grounds, buildings, common areas, and individual rooms demonstrates that all areas appear to have been cleaned regularly and are free of accumulated refuse and unabated graffiti. Restrooms, drinking fountains, and food preparation or serving areas appear to have been cleaned each day that the school is in session.
(2) (A) On or before January 1, 2007, the Office of Public School Construction shall develop the school facility inspection and evaluation instrument and instructions for users. The school facility inspection and evaluation instrument and local evaluation instruments that meet the minimum criteria of this subdivision shall include a system that will evaluate each facility, based on the criteria listed in paragraph (1), on a scale of “good,” “fair,” or “poor,” as developed by the Office of Public School Construction, and provide an overall summary of the conditions at each school on a scale of “exemplary,” “good,” “fair,” or “poor.”
(B) On or before July 1, 2007, the Office of Public School Construction, in consultation with county offices of education, shall define objective criteria for determining the overall summary of the conditions of schools.
(C) For purposes of this paragraph, “users” means local educational agencies that participate in either of the programs established pursuant to this chapter, Chapter 12.5 (commencing with Section 17070.10), or Section 17582.
(e) “Lease” includes a lease with an option to purchase.
(f) “Project” means the facility being constructed or acquired by the state for rental to the applicant school district and may include the reconstruction or modernization of existing buildings, construction of new buildings, the grading and development of sites, acquisition of sites therefor and any easements or rights-of-way pertinent thereto or necessary for its full use including the development of streets and utilities.
(g) “Property” includes all property, real, personal or mixed, tangible or intangible, or any interest therein necessary or desirable for carrying out the purposes of this chapter.
(Amended by Stats. 2009, Ch. 88, Sec. 20. (AB 176) Effective January 1, 2010.)

ATTACHMENT B1a

AUTHORITY

Senate Bill (SB) 129 (Chapter 69, Budget Act of 2021 – Skinner)

SEC. 243.

…

(a) The Office of Public School Construction shall consult with stakeholders such as local educational agency facilities staff, classified employees providing custodial services, certificated employees, local and state public health officials, and other experts in clean, safe, and functional school facilities. The Office of Public School Construction shall consider current standards for school facilities, including, but not limited to, the Association of Physical Plant Administrator's Operational Guidelines for Educational Facilities and both local and state public health guidance and standards.

(c) The State Allocation Board shall adopt an updated Facility Inspection Tool prior to June 30, 2022, for use beginning July 1, 2022.

State Auditor Recommendation (November 2024 Audit Report)	OPSC Response at June 25, 2026 Stakeholder Meeting	Stakeholder Response to June 25, 2026 Stakeholder Meeting
1. Adopt a "broader range of deficiency ratings that specifically differentiates cosmetic deficiencies, minor deficiencies, moderate deficiencies, and extreme deficiencies. Further, DGS should adjust the weighting of the various deficiency ratings to provide a more accurate assessment of each school's compliance with Good Repair Standards. DGS should also provide multiple examples for each section and deficiency level. These examples could include detailed descriptions or photographs that exhibit the differences of severity in common deficiencies. For example, photographs could show a small hole in a carpet, which could be considered cosmetic, and a larger rip, which could pose a trip hazard and therefore warrant a more severe deficiency rating.	**1.** In response, OPSC prepared a potential expansion to the Part II, Evaluation Detail section of the FIT's User Instructions to include a proposed "Minor Deficiency (MD)" rating to monitor deficiencies that may be minor or cosmetic in nature, and pose no health or safety concerns. The "MD" rating was added to clarify the difference between an "MD" and "D" evaluation for purposes of things such as stained curtains, rugs, scratch marks, etc., that otherwise are minor and non-hazardous. OPSC also proposed additions to the descriptions for "D" and "X" ratings for clarification and to better differentiate between the ratings. OPSC clarified that any differences in weighting would be addressed at a future stakeholder meeting, which is presented in this item today.	**1.** OPSC received positive feedback related to the inclusion of the "MD" rating for cosmetic issues, and input advising that it must be scored/weighted differently than a "D" rating.
2. Guidance about scoring individual locations that contain multiple deficiencies in the same section.	**2.** In response to this recommendation, OPSC proposed that additional instructions could be included in the FIT for evaluators to indicate an action plan within the comment section provided for any specific buildings/areas that receive one or more deficiency scores. If an individual location contains multiple deficiencies, the school district should report an action plan in the comments pertaining to the maintenance or repair needed to meet Good Repair Standards, an action plan to address maintenance or timing of the repair, and any work orders associated with the maintenance or repair. OPSC notes that on the existing evaluation detail, there is a section for districts to indicate a "plan to address" and "deficiencies noted in prior year."	**2.** A stakeholder advised that the FIT should focus on identifying observable facility conditions affecting whether a school is clean, safe, and functional. The stakeholder noted that inspectors using the FIT may lack the technical expertise to effectively interpret building codes, fire codes, ADA requirements, Title 24 accessibility standards, or other technical provisions requiring specialized training, or that fall under the jurisdiction of other regulatory agencies. The stakeholder recommended that multiple state agencies coordinate to develop statewide training to better inform potential and current inspectors of expectations related to the FIT, as expanded inspection requirements may pose a financial burden to districts with minimal capacity.

State Auditor Recommendation (November 2024 Audit Report)	OPSC Response at June 25, 2026 Stakeholder Meeting	Stakeholder Response to June 25, 2026 Stakeholder Meeting
3. An update of the scoring system that removes the aggregation of FIT sections into category-level reporting and clarifies how such changes will affect overall scores. For example, the Systems category currently includes HVAC, sewer, and gas. A good score on two of those subcategories could hide problems in a third that scores poor because the overall Systems category score would likely average out to good or fair.	**3.** In response to this recommendation, OPSC presented two iterations of a potential FIT update that compared the current FIT and the State Auditor's recommended FIT (rated by 8 categories versus the 15 individual sections). One of the comparisons used the State Auditor's data, and the other used multiple extreme deficiencies.	**3.** A stakeholder mentioned concern related to the public perception of FIT ratings, advising that if FIT updates ultimately lead to lower ratings resulting solely from revised inspection standards, it could cause public concern regarding school safety and facilities. The stakeholder suggested that publicly reported declines may influence parent perceptions and school choice decisions, potentially impacting enrollment. The stakeholder requested that should these changes be implemented, OPSC communicates when rating changes are attributable to revised standards rather than declining facility conditions.
4. The inclusion of guidance in the FIT on the assessment of specialized learning environments. This guidance should include but not be limited to woodshops, welding shops, and agricultural areas.”	**4.** In response to this recommendation, OPSC presented the concept of expanding existing instructions with a supplemental guidelines document for specialized learning environments, including visual examples of the various ratings for each category to minimize the length of the FIT instructions.	**4.** A stakeholder acknowledged that OPSC may not have the technical expertise or resources for evaluation of building systems, if inspection criteria is to become more technical, statewide training and certification for district and County Office inspectors would be beneficial to reduce subjective interpretation. The stakeholder requested training on the FIT manual, and advised that the FIT manual is quite extensive and could be cumbersome for inspectors to properly understand.

GENERAL INFORMATION

The Facility Inspection Tool (FIT) has been developed by the Office of Public School Construction to determine if a school facility is in "good repair" as defined by Education Code (EC) Section 17002(d)(1) and to rate the facility pursuant to EC Section 17002(d)(2). The tool is designed to identify areas of a school site that are in need of repair based upon a visual inspection of the site. In addition, the EC specifies the tool should not be used to require capital enhancements beyond the standards to which the facility was designed and constructed.

Good repair is defined to mean that the facility is maintained in a manner that ensures that it is clean, safe, and functional. As part of the school accountability report card, school districts and county offices of education are required to make specified assessments of school conditions including the safety, cleanliness, and adequacy of school facilities and needed maintenance to ensure good repair. In addition, beginning with the 2005/2006 fiscal year, school districts and county offices of education must certify that a facility inspection system has been established to ensure that each of its facilities is maintained in good repair in order to participate in the School Facility Program and the Deferred Maintenance Program. This tool is intended to assist school districts and county offices of education in that determination.

County superintendents are required to annually visit the schools in the county of his or her office as determined by EC Section 1240. Further, EC Section 1240(c)(2)(I), states the priority objective of the visits made shall be to determine the status of the condition of a facility that poses an emergency or urgent threat to the health or safety of pupils or staff as defined in district policy, or as defined by EC Section 17592.72(c) and the accuracy of data reported on the school accountability report card with the respect to the safety, cleanliness, and adequacy of school facilities, including good repair as required by EC Sections 17014, 17032.5, 17070.75, and 17089. This tool is also intended to assist county offices of education in performing these functions.

The EC also allows individual entities to adopt a local evaluation instrument to be used in lieu of the FIT provided the local instrument meets the criteria specified in EC Section 17002(d) and as implemented in the FIT. Any evaluation instrument adopted by the local educational agency for purpose of determining whether a school facility is maintained in good repair may include any number of additional items but must minimally include the criteria and rating scheme contained in the FIT.

FIT results may be used as an input in School Accountability Report Cards, which provide information about school conditions to the public (see EC Section 33126). However, the FIT is, by design, a non-expert, visual inspection tool. As such, it may fail to identify deficiencies in school facilities, including ones that affect health and safety, that are not ascertainable by non-experts or by visual inspection.

USER INSTRUCTIONS

The FIT is comprised of three parts as follows:

Part I, Good Repair Standard outlines the school facility systems and components, as specified in EC Section 17002(d)(1), that should be considered in the inspection of a school facility to ensure it is maintained in a manner that assures it is clean, safe and functional. Each of the 15 sections in the Good Repair Standard provides a description of a minimum standard of good repair for various school facility categories. Each section also provides examples of clean, safe and functional conditions. The list of examples is not exhaustive. If an evaluator notes a condition that is not mentioned in the examples but constitutes a deficiency, the evaluator can note such deficiency in the applicable ~~category~~ section as "other."

Some of the conditions cited in the Good Repair Standard represent items that are critical to the health and safety of pupils and staff. Any deficiencies in these items require immediate attention and, if left unmitigated, could cause severe and immediate injury, illness or death of the occupants. They constitute extreme deficiencies and indicate that the particular building system evaluated failed to meet the standard of good repair at that school site. These critical conditions are identified with underlined text followed by an (X) on the Good Repair Standard. If the underlined statement is not true, then there is an extreme deficiency (to be marked as an "X" on the Evaluation Detail) resulting in a "poor" rating for the applicable category. It is important to note that the list of extreme deficiencies noted in the Good Repair Standard is not exhaustive. Any other deficiency not included in the criteria but meeting the definition above can be noted by the evaluator and generate a poor rating.

Part II, Evaluation Detail is a site inspection template to be used to evaluate the areas of a school on a ~~category~~ section by ~~category~~ section basis. The design of the inspection template allows for the determination of the scope of conditions across campus. In evaluating each area or space, the user should review each of the 15 ~~categories~~ sections identified in the Good Repair Standard and make a determination of whether a particular area is in good repair. Once the determination is made, it should be recorded on the Evaluation Detail, as follows:

OK	**No Deficiency - Good Repair:** Mark "OK" if all statements in the Good Repair Standard are true, and there is no indication of a deficiency in the specific ~~category~~ section.
CD	**Cosmetic Deficiency:** Mark “CD” if one or more statement(s) in the Good Repair Standard for the specific section is not true if the deficiency is cosmetic in nature and does not pose any functionality issues. For example, there are stained curtains, rugs, scratch marks, and otherwise non-hazardous damage that poses no functionality issues and is distinctly appearance-based. These conditions would be a “Cosmetic Deficiency."
MD	**Minor Deficiency:** Mark “MD” if one or more statement(s) in the Good Repair Standard for the specific category is not true, and if the deficiency is minor, but could affect functionality if left damaged, such that it will require maintenance in the future. For example, there is cracked concrete that poses no tripping hazard (i.e. the ground is not elevated). This condition would be a “Minor Deficiency."
D	**Moderate Deficiency:** Mark “D” if one or more statement(s) in the Good Repair Standard for the specific category is not true and does not fit into the CD or MD category, or if there is other clear evidence of the need for repair or corrective action before it becomes a health and safety issue.
X	**Extreme Deficiency**:Indicate “X” if the area has a deficiency that is considered an “Extreme Deficiency” in the Good Repair Standard or there is a condition that qualifies as an extreme deficiency but is not noted in the Good Repair Standard and poses a health or safety issue. In specialized learning environments that have specialized equipment, any materials or conditions that may pose an immediate health and safety issue that are not locked or stored away properly should be considered an “Extreme Deficiency."
NA	**Not Applicable:** If the Good Repair Standard category (building system or component) does not exist in the area evaluated, mark “NA."

Below are suggested methods for evaluating various systems and areas:

- **Gas** and **Sewer** are major building systems that may span the entire school campus but may not be evident as applicable building systems in each classroom or common areas. However, because a deficiency in either of these systems could become evident and present a health and safety threat anywhere on campus, the user should not mark “NA” and should instead include an evaluation of these systems in each building space.
- **Roofs** can be easily evaluated for stand alone areas, such as portable classrooms. For permanent buildings containing several areas to be evaluated, roofs should be considered as parts of individual areas in order to accurately account for a scope of any roofing deficiency. For example, a 10 classroom building contains damaged gutters on one side of the building, spanning across five classrooms. Therefore, an evaluator should mark five classrooms as deficient in the roof category and the other five and sports fields. If a drinking fountain or a set of fountains is located inside a building or immediately outside the area being evaluated, it should be included in the evaluation of that area under Drinking Fountains. If a fountain is located on the school grounds, it should be evaluated as part of that outside space. If there is no drinking fountain in the area evaluated, Drinking Fountains should be marked “NA.”
- **Playgrounds/School Grounds**, should be evaluated as separate areas by dividing a campus into sections with defined borders. In this case, several sections of the good repair criteria would not apply to the evaluation, as they do not exist outside of physical building areas, such as **Structural Damage** and **Fire Safety**, for example.
- **Specialized Classrooms** may include, but are not limited to, classrooms and adjoining learning environments for woodshops, welding shops, science laboratories, makerspaces, and agricultural areas. These areas should be evaluated within the criteria of the fifteen sections. Additional considerations are that these learning spaces are often equipment intensive, containing materials and tools that are not typically present in a traditional classroom. Learning spaces may be indoors or outdoors. Inspectors should ensure that equipment and specialized materials observed in these areas evaluated are safely stored and that there are no observable hazards.

Part III includes the ~~**Category**~~ **Section Totals and Ranking**, the **Overall Rating**, and an area for **Comments and Rating Explanation**.

Once the inspector completes the site inspection, he or she must total the number of areas evaluated. The inspector must also count all of the spaces deemed in good repair, deficient (cosmetic, minor, or moderate), extremely deficient, or not applicable under each of the 15 sections. Next, the evaluator must determine the condition of each section by taking the ratio of the number of areas deemed in good repair to the number of areas being evaluated (after subtracting non-applicable spaces from the total number of areas evaluated). If any of the 15 sections received a rating of extreme deficiency, the ratio (i.e., the percentage of good repair) for that section and the category the section is in should default to zero. The total percent per ~~category~~ section ~~(A through H)~~ is determined by the total of all percentages of systems in good repair divided by the number of sections ~~in that category. For example, to determine the total percent for the Structural category , add the percentages for the Structural Damage and Roof sections and divide the result by two~~

Next, the overall school site score is determined by computing the average percentage rating of the ~~eight categories~~ 15 sections (i.e., the total of all percentages divided by ~~eight~~ 15). Finally, the rater should determine the overall School Rating by applying the Percentage Range in the table provided in Part III to the average percentage calculated and taking into consideration the Rating Description provided in the same table.

*Although the FIT is designed to evaluate each school site within a reasonable range of facility conditions, it is possible that an evaluator may identify critical facility conditions that

classrooms as in good repair, assuming there are no other visible deficiencies related to roofing.

- **Overall Cleanliness** is intended to be used to evaluate the cleanliness of each space. For example, a user should note a deficiency due to dirty surfaces in Overall Cleanliness, rather than **Interior Surfaces**. At the same time, the user should note such deficiency only in Overall Cleanliness in order to avoid accounting for such deficiency twice, i.e. in two sections.
- The tool is designed to evaluate stand-alone restrooms as separate areas. However, restrooms contained within other spaces, such as a kindergarten classroom or a library, can be evaluated as part of that area under Restrooms. If the area evaluated does not contain a restroom, Restrooms should be marked "NA."
- **Drinking fountains** can exist within individual classrooms or areas, right outside of classrooms or restrooms or other areas, or as stand alone fixtures on playgrounds

result in an Overall School Rating that does not reflect the urgency and severity of those deficiencies and/or does not match the rating's Description in Part III. In such instances, the evaluator may reduce the resulting school score by one or more grade categories and describe the reasons for the reduction in the space provided for Comments and Rating Explanation.

When completing Part III of the FIT, the inspector should note the date and time of the inspection as well as weather conditions and any other pertinent inspection information in the specific areas provided and utilize the Comments and Rating Explanation Section if needed.

When completing Part III of the FIT, the school district should be provided the opportunity to provide comments and utilize the Comments and Rating Explanation Section if needed.

PART I: GOOD REPAIR STANDARD

(X): If underlined statement is not true, then this is an extreme deficiency (marked as an "X") on the Evaluation Detail resulting in a "poor" rating for the applicable category.

Gas ~~Leaks~~ Systems
Gas systems and pipes appear safe, functional, and free of leaks.
Examples include but are not limited to the following:

a. There is no odor that would indicate a gas leak. (X)
b. Gas pipes are not broken and appear to be in good working order. (X)
c. Other

~~Mechanical Systems~~ Ventilation/Temperature
Heating, ventilation, and air conditioning systems (HVAC) as applicable are functional and unobstructed. Examples include, but are not limited to, the following:
a. The HVAC system is operable. (X)
b. The facilities are ventilated (via mechanical or natural ventilation).
c. The ventilation units are unobstructed and vents and grills are without evidence of excessive dirt or dust.
d. There appears to be an adequate air supply to all classrooms, work spaces, and facilities (i.e. no strong odor is present, air is not stuffy)
e. Interior temperatures appear to be maintained within normally accepted ranges.
f. The ventilation units are not generating any excessive noise or vibrations.
g. Other
The inspector may indicate in the comments the following:
i. Whether an area relies on mechanical or natural ventilation.
ii. Whether a device for monitoring temperature and humidity is present in the area.
iii. What temperature and humidity extremes are recorded (if available).

Sewer
Sewer line stoppage is not evident. Examples include but are not limited to the following:
a. There are no obvious signs of flooding caused by sewer line back-up in the facilities or on the school grounds. (X)
b. The sanitary system controls odors as designed.
c. Other

Interior Surfaces (Floors, Ceilings, Walls, and Window Casings)
Interior surfaces appear to be clean, safe, and functional. Examples include but are not limited to the following:
a. Walls are free of hazards from tears and holes.
b. Flooring is free of hazards from torn carpeting, missing floor tiles, holes.
c. Ceiling is free of hazards from missing ceiling tiles and holes.
d. There is no evidence of water damage (e.g. no condensation, dampness, staining, warping, peeling, mineral deposits, etc.)
e. Other

Overall Cleanliness
School grounds, buildings, common areas, surfaces, and individual rooms appear to have been cleaned regularly. Examples include but are not limited to the following:
a. Restrooms, drinking fountains, and food preparation or serving areas appear to have been cleaned each day that school is in session.
b. An area should appear to be clean with minimal dirt, dust, or buildup. Floors and carpets should appear to have been swept or cleaned within the last week. Light fixtures and all bulbs are working properly. Facilities area adequately stocked and odor free. (OK)
c. An area marked as "Deficiency" would appear to not have been cleaned in the last two weeks and carpet may look dull, matted, or stained. Corners of the room may have a recognizable amount of dirt or grime buildup. Floors do not appear to have been swept or vacuumed in two weeks. Some light fixtures are dirty and fewer than five percent of the bulbs have burned out. Daily trash has not been taken out. (D)
d. An area marked as having an "Extreme Deficiency" would appear to be dirty, dingy, or scuffed with an evident buildup of dust, dirt, stains, or trash. Floors have not been swept or vacuumed in over two weeks. Light fixtures are dirty and more than five percent of the bulbs have burned out. There is trash overflow and the area being evaluated has a foul odor. (X)
e. Area(s) evaluated is free of unabated graffiti.
f. Other

Part IIb (Optional) - The Cleanliness Detail worksheet may be used to evaluate the Overall Cleanliness of each area. Based on Part IIb, use the following to complete Part IIa:
The district may choose how to report maintenance and custodial staff. The district may report staffing at the site or district level. Staffing may be based on assigned staff or represented as Full-Time Equivalent increments.
a. If 75.0 percent or more of the review is "Yes", the area should be rated clean (OK).
b. If 50 - 74.9 percent of the review is "Yes", the area should be rated "Deficient (D)".
c. If 49.9 percent or less of the review is "Yes", the area should be rated Extreme Deficiency (X)

1. Floors swept, vacuumed, and/or mopped. Free of spots stains, and build up.
2. Walls and Doors free of spots and grime.
3. Desk and Counters clean.
4. Furniture dusted and clean.
5. Baseboards and window sills dusted and clean.
6. Light fixtures clean.
7. Sink clean and drains working properly.
8. Trash cans are empty and clean. The ground is free of trash. Floors and furniture are free of gum and/or other food residue.
9. Windows are free from damage, clean, and in working condition.
10. Water fountains, including handles/buttons, are clean and in working condition.
11. Toilets and bathroom sinks are clean and in working condition.
12. Mirrors and Hand Dryers are clean, intact, and in working condition.
13. Bathroom supplies are stocked and in working condition.
14. Area is free of graffitti.
15. Landscaping - Maintained sufficiently to not hinder student and staff.

Pest/Vermin Infestation
Pest or vermin infestation are not evident. Examples include but are not limited to the following:
a. There is no evidence of a major pest or vermin infestation. (X)
b. There are no holes in the walls, floors, or ceilings.
c. Rodent droppings or insect skins are not evident.
d. Odor caused by a pest or vermin infestation is not evident.
e. There are no live rodents observed.
f. Other

Electrical (Interior and Exterior)

1. There is no evidence that any portion of the school has a power failure. (X)

2. Electrical systems, components, and equipment appear to be working properly.
a. There are no exposed electrical wires. Electrical equipment is properly covered and secured from pupil access. (X)
b. Outlets, access panels, switch plates, junction boxes and fixtures are properly covered and secured from pupil access.
c. Other

3. Lighting appears to be adequate and working properly, including exterior lights. Examples include but are not limited to the following:
a. Lighting appears to be adequate.
b. Lighting is not flickering.
c. There is no unusual hum or noise from the light fixtures.
d. Other

Restrooms

Restrooms in the vicinity of the area being evaluated appear to be accessible during school hours, clean, functional and in compliance with SB 892 (EC Section 35292.5) and AB 367 (EC Section 35292.6). The following are examples of compliance with SB 892 and AB 367:

a. Restrooms are maintained and cleaned regularly.
b. Restrooms are fully operational.
c. Restrooms are stocked with toilet paper, menstrual products, soap, and paper towels.
d. Restrooms are open during school hours.
e. Other

Sinks/Fountains (Inside and Outside)

Drinking fountains appear to be accessible and functioning as intended. Examples include but are not limited to the following:
a. Drinking fountains are accessible.

b. Water pressure is adequate.
c. A leak is not evident.
d. There is no moss, mold, or excessive staining on the fixtures.
e. The water is clear and without unusual taste or odor.
f. Other

Fire Safety

The fire equipment and emergency systems appear to be functioning properly. Examples include but are not limited to the following:
a. The fire sprinklers appear to be in working order (e.g., there are no missing or damaged sprinkler heads). (X)
b. Emergency alarms appear to be functional. (X)
c. Emergency exit signs function as designed, exits are unobstructed. (X)
d. Fire extinguishers are current and placed in all required areas.
e. Fire alarms pull stations are clearly visible.
f. Other

Hazardous Materials (Interior and Exterior)

There does not appear to be evidence of hazardous materials that may pose a threat to pupils or staff. Examples include but are not limited to the following:
a. Hazardous chemicals, chemical waste, and flammable materials are stored properly (e.g. locked and labeled properly). (X)
b. Paint is not peeling, chipping, or cracking.
c. There does not appear to be damaged tiles or other circumstances that may indicate asbestos exposure.
d. Surfaces (including floors, ceilings, walls, window casings, HVAC grills) appear to be free of mildew, mold odor and visible mold.
e. Other

Part IIc (optional) - The Hazardous Materials Detail worksheet may be used to evaluate whether Hazardous Materials are present and stored properly in each area. Based on Part IIc, use the following to complete Part IIa:
a. If 75.0 percent of more of the review is "Yes," the area should be rated safe (OK).
b. If 50-74.9 percent of the review is "Yes," the area should be rated "Moderate Deficiency" (D
c. If 49.9 percent or less of the review is "Yes,"the area should be rated "Extreme Deficiency" (X)
1. Hazardous materials are labeled properly
2. Hazardous materials and chemicals are locked in appropriate locations and students do not have access to them.
3. Paint is not peeled, chipped, or cracked.
4. No mildew, mold odor, or visible mold.
5. Compressed gas cylinders are secured to a wall or cart.
6. Chemical storage containers are intact with no evidence of chemical leakage from containers.
7. Eyewash stations and safety showers are available and operable in areas where corrosives are used.
8. Chemical storage areas are properly ventilated.
9. Potential sources of ignition are turned off.
10. Fume hoods and ventilation systems/exhaust fans are operative.
11. Current and dated inventory lists are posted clearly.
12. Class ABC fire extinguishers are available in chemical storage areas and are in working order.
13. Flammable materials are stored in approved storage containers.

Structural Damage

There does not appear to be structural damage that has created or could create hazardous or uninhabitable conditions. Examples include but are not limited to the following:

a. Severe cracks are not evident. (X)
b. Ceilings & floors are not sloping or sagging beyond their intended design. (X)
c. Posts, beams, supports for portable classrooms, ramps, and other structural building members appear to be intact, secure and functional as designed. (X)
d. There is no visible evidence of severe cracks, dry rot, mold, or damage that undermines the structural components. (X) e. Othe
e. Other

When completing Part III of the FIT, the inspector should note the date and time of the inspection as well as weather conditions and any other pertinent inspection information in the specific areas provided and utilize the Comments and Rating Explanation Section if needed.

Roofs (observed from the ground, inside/outside the building)
Roof systems appear to be functioning properly. Examples include but are not are not limited to the following:
a. Roofs, gutters, roof drains, and down spouts are free of visible damage.
b. Roofs, gutters, roof drains, and down spouts are intact.
c. Other

Playground/School Grounds
playground equipment and school grounds in the vicinity of the area being evaluated appear to be clean, safe, and functional. Examples include but are not limited to the following:
a. Significant cracks, trip hazards, holes and deterioration are not found.
b. Open “S” hooks, protruding bolt ends, and sharp points/edges are not found in the playground equipment.
c. Seating, tables, and equipment are functional and free of significant cracks.
d. There are no signs of drainage problems, such as flooded areas, eroded soil, water damage to asphalt, or clogged storm drain inlets.
e. Other

Windows/Doors/Gates/Fences (Interior and exterior)
Conditions that pose a safety and/or security risk are not evident. Examples include but are not limited to the following:
a. There is no exposed broken glass accessible to pupils and staff. (X)
b. Exterior doors and gates are functioning and do not pose a security risk. (X)
c. Windows are intact and free of cracks.
d. Windows are functional and open, close, and lock as designed, unless there is a valid reason they should not function as designed.
e. Doors are intact.
f. Doors are functional and open, close, and lock as designed, unless there is a valid reason they should not function as designed.
g. Gates and fences appear to be functional.
h. Gates and fences are intact and free of holes and other conditions that could present a safety hazard to pupils, staff, or others.
i. Other

PART IIa: EVALUATION DETAIL Date of Inspection: _____ School Name: _____

Building / Area Name	Estimated Square Footage	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
		GAS ~~LEAKS~~ SYSTEMS	~~MECH/HVAC~~ VENTILATION/ TEMPERATURE	SEWER	INTERIOR SURFACES	OVERALL CLEANLINESS	PEST/VERMIN INFESTATION	ELECTRICAL	RESTROOM	SINKS/ FOUNTAINS	FIRE SAFETY	HAZARDOUS MATERIALS	STRUCTURAL DAMAGE	ROOFS	PLAYGROUND/SCHOOL GROUNDS	WINDOWS/ DOORS/ GATES/FENCES
		COMMENTS:														
		COMMENTS:														
		COMMENTS:														
		COMMENTS:														
		COMMENTS:														
		COMMENTS:														
		COMMENTS:														
		COMMENTS:														
		COMMENTS:														
		COMMENTS:														
District's Plan to Address:																
Deficiencies Noted in Prior Year?																

Use additional Building/Area Lines as necessary.

Marks:

OK = Good Repair
CD = Cosmetic Deficiency
MD = Minor Deficiency
D = Moderate Deficiency
X = Extreme Deficiency
N/A = Not Applicable

PART IIb: CLEANLINESS DETAIL

Date of Inspection: _____ School Name: _____

NUMBER OF MAINTENANCE STAFF IN THE DISTRICT OR AT SITE (SPECIFY): _____

NUMBER OF CUSTODIAL STAFF ASSIGNED TO SITE: _____

Building / Area Name	Area Characteristics (Grade level served, events, traffic volume, public usage, etc.)	1 Floors	2 Walls & Doors	3 Desks & Counters	4 Furniture	5 Baseboards /Window Sill	6 Light Fixtures	7 Sinks	8 Trash / Refuse	9 Windows	10 Water Fountains	11 Toilets	12 Mirrors & Hand Dryers	13 Bathroom Supplies	14 Graffiti	15 Landscaping	Rating
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
		COMMENTS:															
District's Plan to Address:																	
Deficiency Noted in Prior Year?																	

Use additional Building/Area Lines as necessary.

Marks:
Yes = Clean
No = Not Clean
N/A = Not Applicable

*This button will transfer the Rating in Excel column R from this page to FIT's column 5 on the Evaluation Detail page, for each Building / Area. It will overwrite existing data (in the Cleanliness column) for the Building Area / Name.

PART IIb: HAZARDOUS MATERIALS DETAIL Date of Inspection: _____ School Name: -

NUMBER OF MAINTENANCE STAFF IN THE DISTRICT OR AT SITE (SPECIFY):

Building / Area Name	Area Characteristics (Grade level served, events, traffic volume, public usage, etc.)	1 Proper Labeling	2 Proper Hazardous Materials Storage	3 No Paint Damaged	4 No Mold/Mildew	5 Compressed Gas Cylinders Secure	6 Chemical Storage Containers Intact	7 Eyewash and Safety Showers	8 Storage Ventilation	9 Sources of Ignition Are Off	10 Ventilation Systems/Exhaust Fans are Operative	11 Inventory Lists Posted	12 Functional ABC Fire Extinguishers	13 Flammable Materials Stored Properly	Rating
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
		COMMENTS:													
District's Plan to Address:															
Deficiency Noted in Prior Year?															

Use additional Building/Area Lines as necessary.

Marks:

Yes = True
No = False
N/A = Not Applicable

*This button will transfer the Rating in Excel column R from this page to FIT's column 5 on the Evaluation Detail page, for each Building / Area. It will overwrite existing data (in the Cleanliness column) for the Building Area / Name.

SCHOOL DISTRICT/COUNTY OFFICE OF EDUCATION		COUNTY
SCHOOL SITE		SCHOOL TYPE (GRADE LEVELS) / NUMBER OF CLASSROOMS ON SITE: / NUMBER OF RESTROOMS ON SITE:
INSPECTOR'S NAME	INSPECTOR'S TITLE	NAME OF DISTRICT REPRESENTATIVE ACCOMPANYING THE INSPECTOR(S) (IF APPLICABLE)
TOTAL ESTIMATED BUILDING VOLUME (CUBIC FEET):	TIME OF INSPECTION	SITE ENROLLMENT
TOTAL ESTIMATED SITE SQUARE FOOTAGE / ACREAGE:	WEATHER CONDITION AT TIME OF INSPECTION	
TOTAL ESTIMATED BUILDING SQUARE FOOTAGE:		

PART III: SECTION TOTALS AND RANKING (round all calculations to two decimal places)

TOTAL NUMBER OF AREAS EVALUATED	SECTION TOTALS	GAS ~~LEAKS~~ SYSTEMS	~~MECH/HVAC~~ VENTILATION/ TEMPERATURE	SEWER	INTERIOR SURFACES	OVERALL CLEANLINESS	PEST/VERMIN INFESTATION	ELECTRICAL	RESTROOMS	SINKS/ FOUNTAINS	FIRE SAFETY	HAZARDOUS MATERIALS	STRUCTURAL DAMAGE	ROOFS	PLAYGROUND/ SCHOOL GROUNDS	WINDOWS/DOORS/ GATES/FENCES
	Number of "OK"s:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Number of "CD"s:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Number of "MD"s:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Number of "D"s:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	Number of "X"s:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Number of N/As:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Percent of System in Good Repair Number of "OK"s divided by (Total Areas - "NA"s)*																
Total Percent per Section ~~(average of above)~~* (Select one) ~~GOOD = 90%-100%~~ ~~FAIR = 75%-89.99%~~ ~~POOR = 0%-74.99%~~																
~~Average of Percentages Rank (Circle one) GOOD = 90%-100% FAIR = 75%-89.99% POOR = 0%-74.99%~~		~~NA~~		~~NA~~	~~NA~~		~~NA~~	~~NA~~	~~NA~~		~~NA~~	~~NA~~	~~NA~~		~~NA~~	

*Note: An extreme deficiency in any area automatically results in a "poor" ranking for that ~~category~~ section and a zero for "Total Percent per ~~Category~~ Section".

OVERALL RATING:	DETERMINE AVERAGE PERCENTAGE OF ~~8~~ 15 ~~CATEGORIES~~ SECTIONS ~~ABOVE~~ ▶	0.00%	SCHOOL RATING** ⟶	

**For School Rating, apply the Percentage Range below to the average percentage determined above, taking into account the rating Description below.

PERCENTAGE	DESCRIPTION	RATING
99%-100%	The school meets most or all standards of good repair. Deficiencies noted, if any, are not significant and/or impact a very small area of the school.	EXEMPLARY
90%-98.99%	The school is maintained in good repair with a number of non-critical deficiencies noted. These deficiencies are isolated, and/or resulting from minor wear and tear, and/or in the process of being mitigated.	GOOD
75.%-89.99%	The school is not in good repair. Some deficiencies noted are critical and/or widespread. Repairs and/or additional maintenance are necessary in several areas of the school site.	FAIR
0%-74.99%	The school facilities are in poor condition. Deficiencies of various degrees have been noted throughout the site. Major repairs and maintenance are necessary throughout the campus.	POOR

INSPECTOR'S COMMENTS AND RATING EXPLANATION:

DISTRICT'S RESPONSES TO REPORT (Attach additional pages if necessary):

POTENTIAL UPDATES TO FIT INSTRUCTIONS

~~Mechanical Systems~~ Ventilation/Temperature

Heating, ventilation, and air conditioning systems (HVAC) as applicable are functional and unobstructed.

The inspector may indicate in the comments the following:

i. Whether an area relies on mechanical or natural ventilation.
ii. Whether a device for monitoring temperature and humidity is present in the area.
iii. What temperature and humidity extremes are recorded (if available).

Examples include, but are not limited to, the following:

a. The HVAC system is operable. (X)
b. The facilities are ventilated (via mechanical or natural ventilation).
c. The ventilation units are unobstructed and vents and grills are without evidence of excessive dirt or dust.
d. There appears to be an adequate air supply to all classrooms, work spaces, and facilities (i.e. no strong odor is present, air is not stuffy).
e. Interior temperatures appear to be maintained within normally accepted ranges.
f. The ventilation units are not generating any excessive noise or vibrations.
g. Other

SCHOOL FACILITY CONDITIONS EVALUATION

Guidelines for the Facilities Inspection Tool (FIT)

A guide to assist users conducting a visual inspection of school facilities using the FIT, which is an evaluation instrument for purposes of determining if school facilities are in “good repair”. This guide provides inspection tips and examples of how to use the Evaluation Detail site inspection template to evaluate the condition of facilities on a school site by specified categories.

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Contents

Chapter 1: An Overview of School Facility Program Guidelines for the Facilities Inspection Tool (FIT)

What is the Facilities Inspection Tool?

Developed by the Office of Public School Construction, the Facility Inspection Tool (FIT) is a tool[1] used by an evaluator to determine if a school facility is in "good repair" as defined by Education Code (EC) Section 17002(d)(1) and to rate the facility pursuant to at least the minimum criteria listed in EC Section 17002(d)(2). The tool is designed to identify areas of a school site that are in need of repair based upon a visual inspection of the site. The EC specifies that the tool should not be used to require capital enhancements beyond the standards to which the facility was designed and constructed.

County superintendents are required to annually visit the schools in the county as required by EC Section 1240. Further, EC Section 1240(c)(2)(I), states the priority objective of the visits made shall be to determine the status of the condition of a facility that poses an emergency or urgent threat to the health or safety of pupils or staff as defined in district policy, or as defined by EC Section 17592.72(c), and the accuracy of data reported on the school accountability report card (SARC) with the respect to the safety, cleanliness, and adequacy of school facilities, including good repair as required by EC Sections 17014, 17032.5, 17070.75, and 17089. This tool is also intended to assist county offices of education in performing these functions.

What is the Good Repair Standard?

Good repair is defined to mean that the facility is maintained in a manner that ensures that it is clean, safe, and functional. As part of the SARC, school districts and county offices of education are required to make assessments of school conditions including the safety, cleanliness, and adequacy of school facilities and needed maintenance to ensure good repair.

Beginning in the 2005/06 fiscal year, school districts and county offices of education (COE) must certify that a facility inspection system has been established to ensure that each of its facilities is maintained in good repair in order to participate in the School Facility Program. This tool is intended to assist school districts and county offices of education in that determination.

For each facility section listed in the FIT in Part I: Good Repair Standard of the User Instructions, the user assigns a rating to each area assessed. Throughout the Guidelines, the Good Repair Standard for each applicable section is listed, and examples of each rating are included for reference throughout.

(X): if an underlined statement is not true, then this is an extreme deficiency (marked as an "X") on the Evaluation Detail of the FIT, resulting in a "poor" rating for the applicable section.

[1] COEs and school districts are not required to use the FIT when conducting a facilities inspection. They have the option to use a local evaluation instrument in lieu of the FIT, provided the local instrument meets the minimum criteria specified in EC Section 17002(d).

Evaluation Detail Worksheet

The Evaluation Detail is a site inspection template to be used to evaluate the areas of a school site on a section by section basis. This template is found within Part IIa. of the FIT. The design of the inspection template allows for the determination of the scope of conditions across the school site. In evaluating each area or space, the user should review each of the 15 sections identified in the Good Repair Standard and make a determination of whether a particular area is in good repair (OK), or whether another rating is applicable. Once the determination is made, it should be recorded on the Evaluation Detail. The ratings are as follows:

Good Repair Rating (OK)

A rating of “Good Repair “OK” means that the facility section is maintained in a manner that is clean, safe, and functional.

Cosmetic Deficiency Rating (CD)

A “Cosmetic Deficiency (CD)” is cosmetic in nature and does not pose any functionality issues. For instance, if there are stained curtains, rugs, scratch marks, and otherwise non-hazardous damage that poses no functionality issues and is distinctly appearance-based, these deficiencies would be categorized as a “CD”

Minor Deficiency Rating (MD)

A “Minor Deficiency (MD)” refers to conditions where one or more statements in the Good Repair Standard for a specific section are not fully met, but the issues observed are cosmetic in nature and do not affect safety, functionality, or overall operation of the facility.

These issues typically involve minor wear, aesthetic imperfections, or small areas of deterioration that do not pose hazards or require urgent corrective action. While these conditions indicate that the facility is not in perfect repair, they do not compromise the health or safety of occupants and can generally be addressed through routine maintenance.

Moderate Deficiency Rating (D)

A “Moderate Deficiency (MD)” is present when one or more statements in the Good Repair Standard for a specific section are not true and the condition observed goes beyond minor or cosmetic concerns. Deficiencies indicate clear evidence that repair, corrective action, or focused maintenance is needed to restore the facility to an acceptable standard. These issues may affect functionality, building systems, or the overall usability of an area, but do not rise to the level of causing immediate health or safety risks. A Moderate Deficiency signals that the facility is not meeting the expected level of good repair and requires timely attention to prevent further decline or potential safety concerns.

Extreme Deficiency Rating (X)

An “Extreme Deficiency (X)” is a deficiency pertaining to observed deficiencies that are critical to the health and safety of pupils and staff and require immediate attention and, if left unmitigated, could cause severe and immediate injury, illness or death of the occupants. If an area is an “X”, the area evaluated failed to meet the standard of good repair at that school site. These critical conditions are identified with underlined text followed by an (X) on the Good Repair Standard.

If the underlined statement is not true, then there is an extreme deficiency (to be marked as an “X” on the Evaluation Detail) resulting in a “poor” rating for the applicable section. It is important to note that the list of “X” noted in the Good Repair Standard is not exhaustive. Any other deficiency not included in the criteria but meeting the definition above can be noted by the evaluator and generate a poor rating.

Disclaimer on Examples and Illustrative Guidance

The examples in this School Facility Program Guidelines for the Facilities Inspection Tool (FIT) are provided only as general illustrations of common facility conditions. It is not all-encompassing for all situations. All ratings are given at the discretion of the individual performing the inspection of facilities.

Chapter 2: Gas Systems

Gas Systems - Good Repair Standard

Gas systems and pipes appear safe, functional, and free of leaks.
Examples include but are not limited to the following:

a. There is no odor that would indicate a gas leak. (X)
b. Gas pipes are not broken and appear to be in good working order. (X)
c. Other

Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips for Gas Systems

- Inspect every area of campus; no area may be marked NA.
- Look for gas odors, hissing sounds, pilot lights that are out, visible pipe damage, and unsecured fittings.
- Observe kitchen appliances, water heaters, science labs, and exterior gas lines.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
No smell of gas detected, indicating that the area is free from leaks and hazardous fumes.	When walking through the boiler room or kitchen, there is no noticeable odor, and staff report no concerns about gas smells.
Pipes appear intact without corrosion, showing no signs of rust, pitting, or physical damage.	Inspecting the gas line near the water heating reveals smooth, clean metal surfaces, and all connections are securely fastened.
Pilot lights are lit where required, ensuring appliances like stoves and heaters are operational.	The pilot light in the school's kitchen stove is glowing, and the cafeteria stove ignites instantly when tested.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor discoloration or surface wear on gas pipes that does not impact structural integrity or function.	A section of the pipe near the boiler room shows a light, uneven color from age or dust exposure, but the metal remains smooth and solid with no signs of corrosion or weakening.
Slight cosmetic blemishes on fittings, brackets, or pipe insulation that do not affect stability or performance.	A bracket supporting the line behind the kitchen prep area has chipped paint and scuff marks, but it remains tightly secured and fully functional.
Dust, dirt, or residue buildup on exposed gas lines or nearby walls/fixtures that does not interfere with operation or safety.	A thin layer of dust is visible on the horizontal gas line above a storage shelf. While the area needs cleaning, the pipe and fittings are intact, stable, and leak-free.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Early-stage wear or deterioration on gas system components that do not yet compromise function but should be monitored.	A section of the pipe insultation is fraying, exposing the outer pipe surface. Although the pipe remains fully intact and airtight, the insultation should be replaced to prevent future moisture exposure.
Loose or aging valve handles or fittings that remain operable but show signs of reduced stability.	A shut-off valve in the science building turns properly, but the handle has slight play and feels less firm than expected. While the valve can still operate safely, maintenance should tighten or replace the handle.
Minor obstruction or access issues affecting inspection or routine operation but not impacting current safety.	Storage items placed near a gas line make it more difficult to visually inspect the pipe. The system functions normally, but the area needs clearing to maintain safe access.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Evidence of past leak(s) that have been repaired but requires verification, such as patched areas or replaced sections.	There is a visible repair clamp on the pipe behind the gym, but no recent leak is detected. Follow-up is needed to confirm lasting repair.
Evidence of past leak(s) that have been repaired but requires verification, such as patched areas or replaced sections.	There is a visible repair clamp on the pipe behind the gym, but no recent leak is detected. Follow-up is needed to confirm lasting repair.
Missing labels or unclear valve shut-off identification, making emergency responses more difficult.	The main shut-off valve in the basement has no tag or clear signage, requiring staff to search for proper identification during a drill.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Active gas odor is present, signifying a current and potentially dangerous leak.	Upon entering the science lab, a strong gas smell is immediately apparent, prompting urgent evacuation.
Broken gas pipe, creating a direct hazard and requiring immediate repair.	The gas line outside the cafeteria is visibly snapped, with gas escaping from the fracture.
Hissing sound indicating gas escape, a clear sign of an active leak.	Staff hear a loud hissing near the water heater closet, confirming gas is escaping under pressure.

General Illustrative Examples*

*OPSC anticipates developing supplemental captions for the respective pictures, delineating examples of “OK”, “CD”, “MD”, “D”, and “X” at a future stakeholder meeting. Pictures listed here are not reflective of actual school sites, these are for illustrative purposes only.

Chapter 3: Ventilation/Temperature

Ventilation/Temperature - Good Repair Standard

Mechanical Systems, including heating, ventilation, and air conditioning systems (HVAC) are functional and unobstructed. Examples include but are not limited to the following:

a. The HVAC system is operable. (X)
b. The facilities are ventilated (via mechanical or natural ventilation).
c. The ventilation units are unobstructed and vents and grills are without evidence of excessive dirt or dust.
d. There appears to be an adequate air supply to all classrooms, work spaces, and facilities (i.e. no strong odor is present, air is not stuffy).
e. Interior temperatures appear to be maintained within normally accepted ranges.
f. The ventilation units are not generating any excessive noise or vibrations.
g. Other

Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips

- Inspect while rooms are occupied for accurate air circulation assessment.
- Outdoor areas may be marked NA.
- Check for unusual noise, vibration, or odors.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Classroom temperature feels appropriate.	Students and staff report no discomfort; the thermostat reads between 68–72°F, matching the recommended indoor range.
Ventilation grills are clean and unobstructed.	All supply and return grills are free from visible dust or debris, allowing maximum airflow and maintenance logs confirm recent cleaning.
Airflow present at supply and return vents.	A hand test or anemometer confirms steady air movement from vents; papers or lightweight objects react to the breeze, indicating proper circulation.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor smudges, dust, or superficial marks on HVAC vents, grills, or unit casings that	Light dust is visible on the exterior of a return vent even though the inside of the grill is clear and air continues to circulate normally.

Examples of Cosmetic Deficiencies (CD) (cont.)	
Condition Description	**Inspector Evaluation Example Comments(s)**
(cont.) do not affect airflow or system performance.	
Slight discoloration, fading, or cosmetic wear on HVAC unit surfaces or insulation that does not impact functionality or indicate deterioration.	The paint on the metal housing of a classroom ventilation unit is slightly faded, but the unit operates quietly and maintains proper airflow.
Minor cosmetic imperfections on thermostats, fan housings, or wall-mounted HVAC controls that do not affect operation or temperature regulation.	A thermostat has a small scratch across its plastic cover, but the display is clear and temperature controls respond accurately.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Dust buildup on vents or grills that begin to reduce airflow or slightly obstruct ventilation, though the system remains functional.	A classroom supply vent shows enough dust accumulation to noticeably weaken the airflow, even though the room remains adequately ventilated. Cleaning is needed to restore full performance.
Fans or ventilation units produce mild, inconsistent noise or vibration that suggests developing wear in internal components.	A ventilation fan emits a light rattling sound during operation that was not present previously. While airflow is still adequate, the noise indicates emerging mechanical wear that should be monitored.
Localized decreases in airflow or uneven air distribution caused by partially blocked ducts or early filter saturation.	Airflow at one return vent feels weaker than nearby vents due to a partially obstructed duct pathway. The system still maintains proper room temperature but requires maintenance to restore balanced circulation.
Teacher-controlled system changes or temporary shutoffs that inadvertently impact comfort or ventilation for longer than intended.	An instructor turns off the HVAC during a testing period, and the unit remains off for an extended time afterward, leading to minor stuffiness until the system is switched back on.
Specialized spaces appear orderly and well-maintained.	Slight obstruction of circulation pathways due to misplaced tools or carts, but pathways remain open and unobstructed.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Dirty or clogged filters cause reduced airflow.	Filters are visibly gray or black with dust, resulting in weak air movement from vents. A replacement is needed to restore proper function.
Vents damaged or partially detached.	Vent covers are bent, cracked, or hanging loosely from their mounts, which may allow dust to enter the system or reduce airflow.
Exterior HVAC units vibrating excessively.	Outdoor condenser units shake or rattle loudly, possibly due to loose mounting bolts or worn internal components, requiring maintenance attention.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Air conditioning is not working.	On a hot day, the AC system fails to turn on. Temperatures rise above safe levels, prompting a work order for urgent repair.
Heating is not working.	During winter, the heating system is inoperative, causing classroom temperatures to drop below recommended levels and requiring immediate attention.
Severe ventilation failure which leads to stale or stuffy conditions when linked to mechanical failure.	No airflow is detected from vents, resulting in poor indoor air quality, and complaints of stuffiness, odors, or headaches are reported and traced to a broken fan or motor.

General Illustrative Examples*

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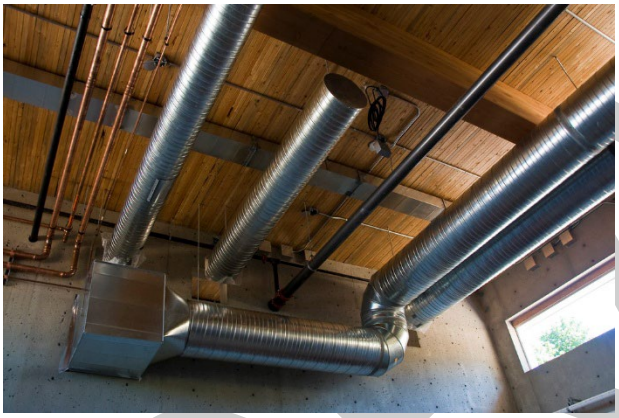
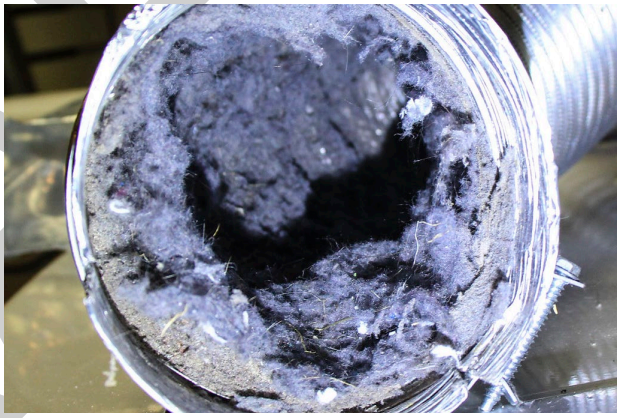

Chapter 4: Sewer

Sewer - Good Repair Standard

Sewer line stoppage is not evident. Examples include but are not limited to the following:

a. There are no obvious signs of flooding caused by sewer line back-up in the facilities or on the school grounds (X)
b. The sanitary system controls odors as designed.
c. Other

Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips

- Inspect every area; do not mark NA.
- Look for signs of flooding, wet floors, odors, residue, or paper debris near drains.
- Check floor drains and plumbing vent function.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
All restrooms and drains are operating normally.	Toilets flush easily and sinks drain quickly without any gurgling or delay. Custodial staff reports no maintenance issues for any restroom or drain in the building.
No foul odors detected indoors or outdoors.	During inspection, there is no noticeable sewer smell in hallways, classrooms, or exterior areas near waste pipes or vents.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor marks, stains, or superficial discoloration on floor surfaces near drains that are not related to past sewer backups and do not indicate active plumbing issues.	A faint gray ring around a classroom floor drain appears to be from routine mopping and not from sewage overflow; the drain functions normally and no odor is present.
Light dust, debris, or residue around drain grates that does not impede water flow and is easily cleaned.	A small amount of dust has collected around a hallway drain cover, but the drain is clear, water flows freely, and no sewer smell is present.

Examples of Cosmetic Deficiencies (CD) (cont.)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Cosmetic imperfections on drain covers, such as minor scratches, fading, or worn paint, that do not impact drainage or indicate underlying damage.	The metal drain grate near the locker room shows surface wear from foot traffic, yet remains secure and functional, with no signs of blockage or odor.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Slow drainage indicating a minor restriction but not causing backup, pooling, or overflow.	A sink in the staff lounge drains more slowly than expected. Although water clears without rising or pooling, the reduced flow suggests an early-stage clog.
Occasional mild sewer odor from infrequently used or dry drains that corrects once water is run through the system.	A faint odor comes from a seldom-used custodial closet floor drain. After running water for a few seconds, the odor disappears and no further issues are observed.
Minor debris accumulation near floor drains that slightly affects flow or indicates early maintenance needs but does not create a hazard.	Small pieces of paper and dust are found around a restroom floor drain. While they do not cause blockage, the debris suggests cleaning is needed to keep the drain fully clear.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Broken sewer pipes without active flooding.	A maintenance inspection reveals a crack in a pipe beneath the building. There is no visible water damage or flooding, but repairs are scheduled.
Sewer odor present; origin unclear.	Persistent sewer smell is noticed in the basement, but the exact source cannot be found. Multiple drains and pipes are checked, and further investigation is needed.
Evidence of past, unresolved stoppages.	Stains or residue are found near floor drains in a restroom, suggesting a previous backup that has not been fully cleaned or addressed.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Flooding caused by sewer line backup.	Water and waste overflow into hallways after a sewer line becomes blocked, requiring immediate emergency response and cleanup.
Active sewage overflow or visible contamination.	Raw sewage spills out of a restroom floor drain, leaving visible waste and requiring biohazard remediation.
Raw sewage exposure or related biohazard condition.	Staff or students are exposed to untreated sewage, creating an urgent health and safety hazard. The area is evacuated and professionals are called for cleanup and repair.

General Illustrative Examples*

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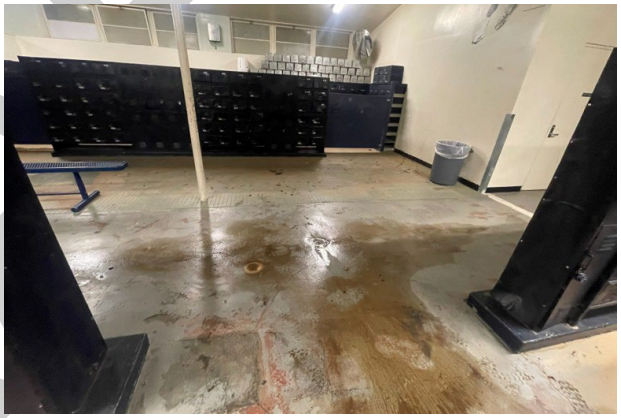

Chapter 5: Interior Surfaces (Floors, Ceilings, Walls, and Window Casings)

Interior Surfaces - Good Repair Standard

Interior surfaces appear to be clean, safe, and functional. Examples include but are not limited to the following:

a. Walls are free of hazards from tears and holes.
b. Flooring is free of hazards from torn carpeting, missing floor tiles, holes.
c. Ceiling is free of hazards from missing ceiling tiles and holes.
d. There is no evidence of water damage (e.g. no condensation, dampness, staining, warping, peeling, mineral deposits, etc.)
e. Other

Inspection Tips

- Conduct a top-to-bottom scan: ceilings → walls → floor.
- Evaluate all indoor areas; outdoor areas may be NA.
- Avoid double-counting cleanliness issues (e.g., dust under Overall Cleanliness).

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Ceiling tiles intact and clean.	This means all ceiling tiles are securely in place, without any cracks, holes, or discoloration. For example, a classroom ceiling shows no signs of water spots or damaged tiles, and every tile fits perfectly without gaps.
Carpet flat and unstained.	The carpet is smooth, without bumps or wrinkles, and free from visible stains or spills. For instance, the hallway carpet has no coffee stains, tears, or raised sections that could pose a tripping hazard.
No signs of dampness or mold.	There are no visible wet spots, musty odors, or mold growth on walls, floors, or ceilings. For example, a restroom is free from condensation on surfaces, and no mold is present around sinks or vents.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Superficial surface marks, scuffs, or worn paint on walls, trim, or casings that do not affect structural soundness or pose hazards.	Faint scuff marks along the hallway baseboards from foot traffic are visible, but the wall and trim remain fully intact with no holes or damage.
Minor discoloration or light fading on interior surfaces are not caused by active water intrusion.	A slightly discolored area of wall paint appears due to age or sun exposure, but no staining, dampness, or peeling is present.
Small cosmetic chips or scratches on flooring or window casings that do not create tripping hazards or expose underlying materials.	A window ledge has minor paint chips along the edge. The casing is secure and functional, and there are no signs of moisture penetration.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Small cracks in walls that show early settling or wear but do not indicate structural compromise.	A thin, superficial crack near a classroom doorway remains unchanged over time and does not allow moisture intrusion.
Temporary or residual ceiling stains from previously corrected leaks, where no active moisture is present.	A faint yellow stain remains on a ceiling tile after a plumbing leak was repaired. Maintenance records confirm the area is now dry.
Minor scuffing, scratching, or chipped paint that affects appearance but does not hinder the function of interior surfaces.	Scuffs on the lower wall area from moving desks are visible but do not affect stability or indicate deeper damage.
Light wear or minor rippling in carpet or flooring that does not yet create a hazard but requires monitoring.	A small area of carpet near the library entrance has a slight ripple forming. It is not a tripping hazard but should be flattened or re-stretched to prevent worsening.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Loose or missing ceiling or floor tiles.	Some ceiling or floor tiles are not securely fastened or are missing, which may cause drafts or expose pipes. For example, a ceiling tile in the library is missing, leaving wiring visible.
Visible water damage or current staining.	Active wet spots, discoloration, or peeling paint from water leaks. For instance, a classroom wall has brown stains and bubbling paint, indicating a pipe leak that needs repair.
Carpeting is torn, rippled, or heavily worn.	Sections of carpet are frayed, bunched up, or threadbare. For example, the carpet in the main entrance has a tear that could trip someone or looks dirty even after cleaning.
Mold or mildew present in non-critical areas.	Small patches of mold found in areas where it doesn't threaten health, such as behind a storage shelf or in an unused closet, but needs to be addressed before it spreads.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Interior surfaces with visible mold growth affecting health.	Extensive mold is present on walls, ceilings, or floors, posing health risks such as respiratory issues. For example, black mold spreading across a classroom wall, requiring immediate remediation and possible evacuation.
Warping or bubbling due to active water intrusion.	Walls, floors, or ceilings are visibly deformed from ongoing water leaks, which can compromise structure and safety. For instance, a hallway wall is swollen and soft to the touch due to a broken pipe, indicating urgent repair is needed.

General Illustrative Examples*

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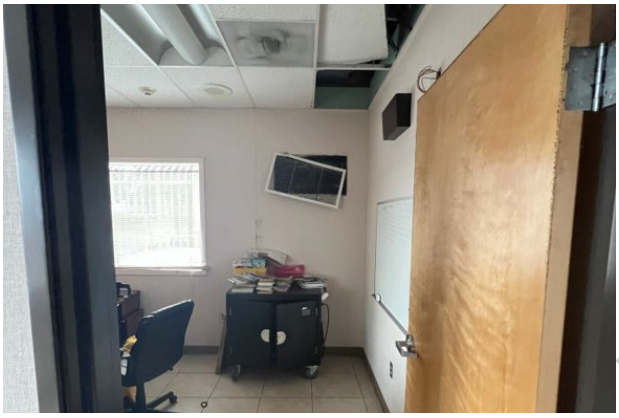
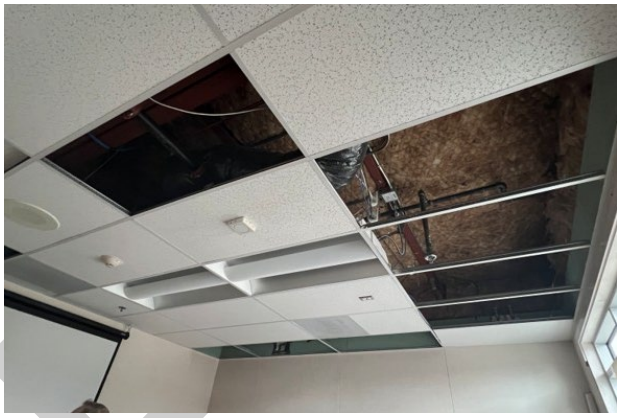


Chapter 6: Overall Cleanliness

Overall Cleanliness - Good Repair Standard

School grounds, buildings, common areas, surfaces, and individual rooms appear to have been cleaned regularly. Examples include but are not limited to the following:

a. Restrooms, drinking fountains, and food preparation or serving areas appear to have been cleaned each day that school is in session.
b. An area should appear to be clean with minimal dirt, dust, or buildup. Floors and carpets should appear to have been swept or cleaned within the last week. Light fixtures and all bulbs are working properly. Facilities area adequately stocked and odor free. (OK)
c. An area marked as "Deficiency" would appear to not have been cleaned in the last two weeks and carpet may look dull, matted, or stained. Corners of the room may have a recognizable amount of dirt or grime buildup. Floors do not appear to have been swept or vacuumed in two weeks. Some light fixtures are dirty and fewer than five percent of the bulbs have burned out. Daily trash has not been taken out. (D)
d. An area marked as having an "Extreme Deficiency" would appear to be dirty, dingy, or scuffed with an evident buildup of dust, dirt, stains, or trash. Floors have not been swept or vacuumed in over two weeks. Light fixtures are dirty and more than five percent of the bulbs have burned out. There is trash overflow and the area being evaluated has a foul odor. (X)
e. Area(s) evaluated is free of unabated graffiti.
f. Other

Inspection Tips

- Consider time of day (e.g., lunch areas immediately post-lunch).
- Note cleanliness only in this section, not Interior Surfaces.
- Evaluate ease of cleaning; clutter may be a cleanliness deficiency.

Examples of Good Repair Standard (OK)

Condition Description	Inspector Evaluation Example Comments(s)
Floors swept/mopped	No visible debris or stains. Corners and edges are clean, walkways are unobstructed and dry, trash bins are emptied and not overflowing
Surfaces dusted	Desks, shelves, and countertops are free of dust; window ledges and equipment are wiped down; no visible fingerprints or smudges
Spaces free of clutter that obstructs movement	Hallways and entrances are clear, chairs and tables are neatly arranged, storage items are organized, and emergency exits and access points are unobstructed.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Light dust or minor residue on horizontal surfaces that do not affect sanitation or indicate prolonged lack of cleaning.	A thin layer of dust is visible on window ledges before morning custodial rounds, but desks, floors, and common areas remain clean and orderly
Small, non-offensive markings or minor pencil/pen graffiti awaiting removal that do not impact cleanliness or campus climate.	A student has drawn a small doodle on the corner of a desk, the mark is noticeable but does not detract from the overall cleanliness of the classroom
Minor clutter such as books, jackets, or personal items temporarily placed in workspaces without creating blockage or cleaning difficulty.	A couple of student backpacks are left leaning against desks after class, but walkways remain clear and surfaces are otherwise clean.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Light dirt buildup or smudges on floors, walls, or surfaces due to cleaning delays or partial cleaning, but not rising to the level of neglect.	A classroom floor has noticeable footprints and minor debris accumulated since lunch, but no stains, odors, or large-scale buildup is present.
Clutter that begins to interfere with ease of cleaning or movement but does not yet obstruct walkways or pose a safety concern.	Several stacks of papers and supplies accumulate on counters, making dusting and wiping more difficult but the items do not block exits or pose hazards.
Minor restroom or common-area cleanliness issues, such as small spots on mirrors, lightly soiled sinks, or floor debris not yet addressed.	A restroom sink shows light soap residue and a few water spots, even though fixtures remain functional and the area is generally sanitary.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Excessively dirty floors or carpets.	Large stains, sticky residues, visible footprints, an accumulation of trash or food crumbs, unpleasant odors from neglect.
Cluttered spaces that impede cleaning or movement.	Boxes or equipment blocking aisles, furniture piled together making areas inaccessible, personal items scattered across walkways.
Unsecured items stacked too high.	Stacks of books or supplies precariously balanced, unstable piles of chairs or bins, risk of items falling.
Active graffiti not addressed.	Large spray paint on walls, offensive language or images visible, graffiti present in multiple places.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Biological contamination from pests/waste	Visible rodent droppings, insect infestations, mold growth, bodily fluids not cleaned up.
Hazards caused by severe obstruction or unsanitary conditions.	Blocked emergency exits, piles of trash or debris creating tripping hazards, areas inaccessible due to contamination.

General Illustrative Examples*

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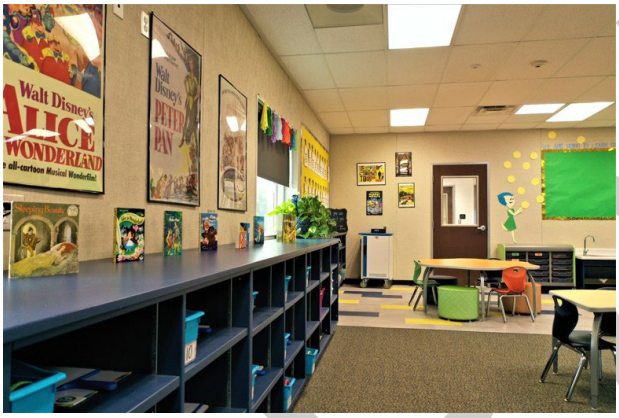

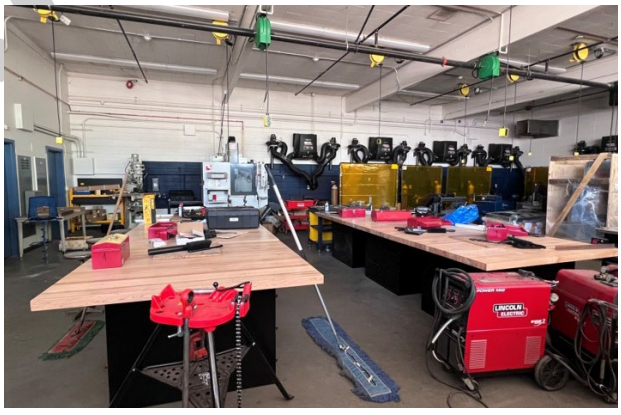

Chapter 7: Pest/Vermin Infestation

Pest/Vermin Infestation - Good Repair Standard

Pest or vermin infestation are not evident. Examples include but are not limited to the following:

a. There is no evidence of a major pest or vermin infestation. (X)
b. There are no holes in the walls, floors, or ceilings.
c. Rodent droppings or insect skins are not evident.
d. Odor caused by a pest or vermin infestation is not evident. Area(s) evaluated is free of unabated graffiti.
e. There are no live rodents observed.
f. Other

Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips

- Check hidden areas, under sinks, along baseboards, storage rooms, closets.
- Verify food service areas, trash storage, and kitchens for signs of activity.
- Inspect for structural gaps that may allow entry (around pipes, doors, vents).
- Look for secondary signs (chew marks, nesting material, insect casings).
- Consider the time of year, warm months can show increased insect activity.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
No evidence of pests or vermin.	No droppings, no insect casings, no chew marks, and no live pests seen.
Surfaces and storage areas are clean and sealed.	Trash bins have lids, food areas are sanitary, and no clutter that attracts pests.
No structural gaps that allow pest entry.	Door sweeps in are in place, wall penetrations are sealed, and window screens intact
Area is odor-free and sanitary.	No foul smells, drains are clean, custodial areas are clean and maintained.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor marks, smudges, or superficial surface debris near baseboards or corners that do not indicate droppings, nesting, or pest movement.	Light dust in a classroom corner is visible, but there are no chew marks, casings, droppings, or holes that would suggest pest activity.
Small cosmetic wall or floor imperfections that are not large enough to allow pest entry.	A hairline crack in a wall near a storage shelf is visible but sealed enough that it cannot serve as an entry point for insects or rodents.
Slight clutter that does not attract pests or impede cleaning.	A couple of empty boxes are stacked neatly in a closet; while they should be removed during routine tidying, they do not contain food waste, nesting material, or conditions conducive to pests.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Isolated signs of pests, such as a few insect casings or minor ant activity, without evidence of an active infestation.	Two ant trails are found near a windowsill in a classroom. There are no droppings, nests, or structural gaps, suggesting early or occasional activity.
Small gaps or cracks around baseboards, vents, or door sweeps that could allow minor pest entry but have not yet resulted in intrusion.	A slight gap is visible beneath a door sweep in the multipurpose room. It's small enough that no pests have entered, but sealing is needed to prevent future issues.
Minor clutter or disorganization that could attract pests if it accumulates further.	A few snack wrappers left on a teacher's desk at the end of the day could attract ants but have not yet resulted in any trail or infestation.
Mild odors that may suggest early pest activity, but no droppings, debris, or visible pests are present.	A faint musty smell is detected in a storage area, but inspection reveals no holes, nesting material, or structural deterioration. The odor may be caused by old or damp cardboard.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Clear signs of pest activity.	Multiple rodent droppings or visible chew marks on food packaging.
Structural openings likely allowing pest entry.	Holes behind appliances, gaps around plumbing, missing door sweeps.
Evidence of nesting or breeding sites.	Shredded paper or insulation in corners or clustered insect casings.
Moderate odor indicating pest presence.	Stale, foul smell from a specific area, such as a strong food waste odor.
Clutter impeding proper inspection or cleaning.	Piles of materials blocking walls, such as full trash bins stored indoors.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Widespread or severe infestation.	Live rodents observed, large quantities of droppings observed, or insects swarming or nesting.
Major structural damage due to pests.	Large holes in walls, heavily chewed materials, damaged insulation
Biological contamination from pests/waste.	Rodent urine trails, large clusters of insect skins, contamination of food areas.
Strong, foul odors indicating major pest activity.	Rotting smells, ammonia like rodent odor, decaying waste.
Hazards due to unsanitary conditions.	Trash overflow is attracting pests. Exits are blocked due to debris. Contamination making an area unusable and unsafe for staff or students to be in.

General Illustrative Examples*

*OPSC anticipates developing supplemental captions for the respective pictures, delineating examples of “OK”, “CD”, “MD”, “D”, and “X” at a future stakeholder meeting. Pictures listed here are not reflective of actual school sites, these are for illustrative purposes only.

D.

Chapter 8: Electrical (Interior & Exterior)

Electrical (Interior & Exterior) - Good Repair Standard

1. *There is no evidence that any portion of the school has a power failure (X)*
2. *Electrical systems, components and equipment appear to be working properly.*
   a. There are no exposed electrical wires. Electrical equipment is properly covered and secured from pupil access (X)
   b. Outlets, access panels, switch plates, junction boxes and fixtures are properly covered and secured from pupil access.
   c. Other
3. Lighting appears to be adequate and working properly, including exterior lights. Examples include but are no limited to the following:
   a. Lighting appears to be adequate.
   b. Lighting is not flickering
   c. There is no unusual hum or noise from light fixtures
   d. Other

   Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips

- Check classroom outlets, power strips, surge protectors, and extension cords for improper use.
- Inspect electrical panels to ensure they are closed, accessible, and unobstructed.
- Look for frayed cables, damaged cords, or improperly mounted fixtures.
- Test light switches and observe any flickering lights or noise.
- Review exterior lighting for safety issues, especially in walkways and parking areas.
- Note electrical safety hazards only here, not in Interior Surfaces.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
All electrical systems operating safely with no visible hazards.	Outlets are securely covered, switch plates are intact, wiring is hidden and protected, electrical panel closed and accessible.
Lighting is fully functional.	Adequate brightness with no flickering, buzzing or humming. All light bulbs functioning
No power disruptions.	No outages, circuits are performing normally and equipment is powered reliably
No improper equipment usage.	Surge protectors are used correctly, extension cords are not daisy chained, and appliances are properly placed away from water sources.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Superficial dust, smudges, or light residue on electrical fixtures, switch plates, or outlet covers that do not affect operation.	A classroom light switch plate has a few smudges and fingerprints from student use, but the plate is secure and the switch operates normally.
Minor discoloration or fading on outlet covers, conduit surfaces, or fixture housings that is not related to overheating or electrical stress.	An outlet cover appears slightly yellowed due to age, but there is no warping, burning odor, or heat mark; the outlet functions and remains safe.
Small cosmetic imperfections on fixture housings or accessory hardware not affecting electrical integrity.	A ceiling light fixture has a small scratch on its plastic cover, cosmetically noticeable but not related to electrical wear or malfunction.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Light dust or debris inside fixture covers or vents that slightly reduces illumination or ventilation but does not create electrical risk.	A classroom light diffuser has collected a thin layer of dust inside the cover, causing slightly dimmer lighting even though the fixture is fully functional.
Outlet plates, switch plates, or conduit components that are mildly loose or beginning to shift but still remain fully attached and safe.	An outlet cover wiggles slightly when touched, but no wiring is exposed and the outlet continues to operate safely.
Minor lighting issues such as occasional flickering or one bulb out in a multi-bulb fixture, not indicating wiring failure.	A hallway light flickers briefly when turned on but then stabilizes, maintenance is needed to replace the bulb and check the connection.
Minor obstruction of access to electrical panels or fixtures that does not block operation but reduces proper clearance.	A box is placed near an electrical panel, narrowing access but not preventing inspection or operation and the box needs repositioning to restore a clear workspace.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
There are active electrical concerns requiring corrective action.	Broken outlet covers, unsecured wiring in a low-traffic area, or improperly mounted fixtures.
Problems that impede safety or function.	Electrical panel blocked by furniture, frequent flickering lights, buzzing from light fixtures.
Improper use of electrical equipment	Excessive extension cord usage; appliances placed too close to water

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Severe electrical hazards posing immediate danger.	Exposed live electrical wires, sparked or burnt outlets, or major power failure affecting part or all of the school.
Unsafe conditions that significantly threaten health or safety.	Overheated electrical equipment or power strips, a burning smell or visible smoke, an outlet or panel showing signs of fire risk, daisy chained surge protectors.
Major lighting failures.	Widespread outages, large number of fixtures inoperative, or severe flickering across multiple rooms.
Structural electrical hazards.	Open high voltage junction boxes, nonfunctional emergency lighting, electrical systems compromised by water intrusion.
Damaged components.	Cracked switch plates; frayed cords; missing fixture covers.

General Illustrative Examples*

*OPSC anticipates developing supplemental captions for the respective pictures, delineating examples of “OK”, “CD”, “MD”, “D”, and “X” at a future stakeholder meeting. Pictures listed here are not reflective of actual school sites, these are for illustrative purposes only.

Chapter 9: Restrooms

Restrooms - Good Repair Standard

Restrooms in the vicinity of the area being evaluated appear to be accessible during school hours, clean, functional and in compliance with SB 892 (EC Section 35292.5) and AB 367 (EC Section 35292.6). The following are examples of compliance with SB 892 and AB 367:

a. Restrooms are maintained and cleaned regularly.
b. Restrooms are fully operational.
c. Restrooms are stocked with toilet paper, menstrual products, soap, and paper towels.
d. Restrooms are open during school hours.
e. Other

Inspection Tips

- Consider the time of day (beginning of school, end of day, lunch periods).
- Stand alone restrooms should be evaluated individually as separate rooms.
- If a restroom is located inside another space (classroom, office, health room), evaluate the restroom fixtures and supplies within that space.
- Cleanliness issues inside the restroom should be captured here (not under Overall Cleanliness).
- If an area has no restroom, mark as “NA”.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Restrooms are clean, sanitary, and stocked.	Toilets/urinals/sinks working, soap dispensers filled, menstrual products available per AB 367, toilet paper and paper towels present, hand dryers working.
Restrooms are accessible and open during school hours	Doors unlocked, signage present, stalls intact and functional; exhaust fans operating properly
No odors or leaks present	No sewer smell; sinks functional without dripping; floors dry; no signs of mold

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor scuff marks, smudges, or surface-level dirt on walls, partitions, or counters that do not compromise cleanliness or restroom use.	Light shoe scuffs are visible low on the restroom stall partitions, but the stalls are intact, sanitary, and fully functional.
Small cosmetic chips, scratches, or fading on restroom surfaces such as paint, laminate edges, or mirror frames.	A mirror's frame shows minor wear along the corner edge, yet the mirror is intact, clean, and fully usable.
Minor residue or faint water spots on sinks, faucets, or dispensers that do not indicate lack of cleaning or affect functionality.	A sink faucet has a few dried water marks from earlier use. The sink drains properly and the area is otherwise clean and stocked.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor cleanliness or stocking issues such as slightly low soap, limited toilet paper, or small debris present.	One soap dispenser is partially low, though still usable, and a small amount of tissue is found near a stall. The restroom remains functional and sanitary.
Minor fixture concerns that do not prevent restroom operation, such as slightly loose hardware or slow drains.	A stall latch wiggles slightly when closed, but it secures properly. A handwashing sink drains more slowly than expected without pooling.
Minor clutter or maintenance issues that do not interfere with restroom access or sanitation.	A custodial bucket is temporarily stored in a corner, or mild stains are visible on tile grout but do not indicate mold or leakage.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Not all fixtures are operational.	Broken toilet or urinal; clogged sink; multiple dispensers empty; broken hand dryer; stall doors missing or not secured
Cleanliness problems and odors.	Restroom is dirty, trash is overflowing, there is a persistent odor, or visible mold is near fixtures.
Accessibility issues.	Restrooms are locked during school hours, or signs of vandalism impacts usability.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Severe unsanitary or hazardous conditions.	Raw sewage backup, significant flooding, major plumbing failure, or biohazard conditions.
Severe fixture or structural damage.	Multiple nonfunctional toilets/urinals, there are collapsed stalls or partitions, or there is an electrical hazard near water.
Restrooms not sufficiently stocked pursuant to EC Section 35292.5 and EC Section 35292.6.	No soap, no toilet paper, no menstrual products across entire restroom.
Strong odors indicating serious failure.	Sewer gas smell, mold infestation, or nonfunctioning ventilation causing health concerns.

General Illustrative Examples*

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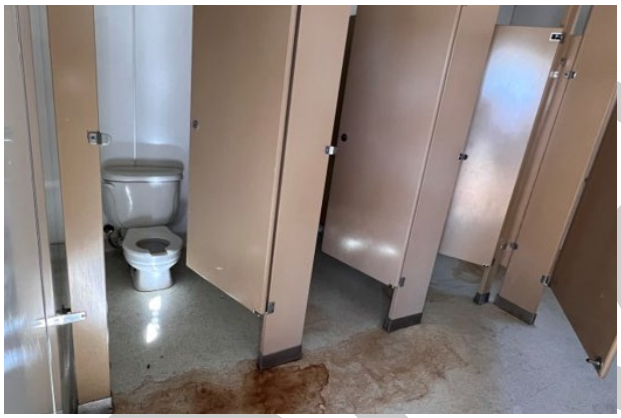
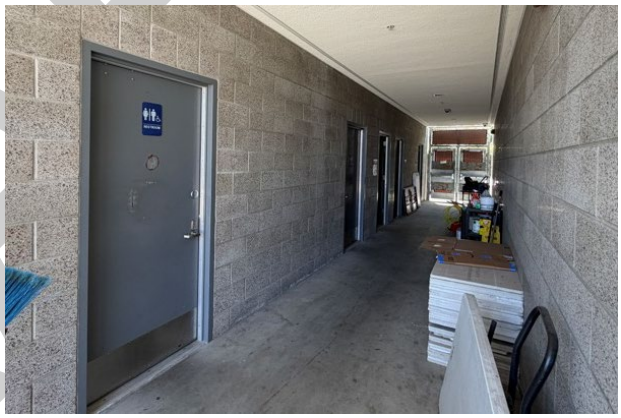

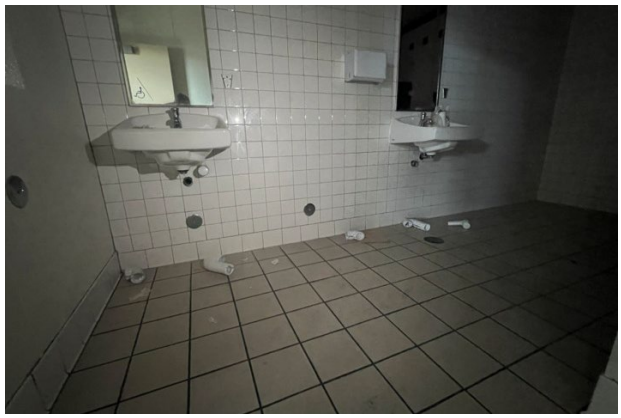

Chapter 10: Sinks/Fountains (Inside and Outside)

Sinks/Fountains (Inside and Outside) - Good Repair Standard

Drinking fountains and sinks appear to be accessible and functioning as intended. Examples include but are not limited to the following:

a. Drinking fountains are accessible.
b. Water pressure is adequate.
c. A leak is not evident.
d. There is no moss, mold, or excessive staining on the fixtures.
e. The water is clear and without unusual taste or odor.
f. Other

Inspection Tips

- Confirm whether the sink or drinking fountain belongs in this section.
- Verify accessibility: fixtures should not be blocked by furniture, trash bins, or stored materials.
- Observe the condition of surrounding walls, floors, and mounting surfaces for signs of damage or moisture.
- Test operation: water should dispense at an angle and be protected by a mouth guard when designed to do so.
- Ensure fountains are not connected to irrigation systems.
- For exterior fountains, check for environmental buildup (leaves, soil, moss) and proper drainage.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Fixture is fully operational and provides clear, clean water.	Water flows at expected pressure, button/knob functions normally, no rust, stains, or odors.
Accessible and unobstructed.	No items blocking approach, height appropriate, ADA fountain functional where provided.
No visible leaks or moisture damage.	No drips below fixture, surrounding walls/floors dry.
Clean and sanitary appearance.	No mold, moss, grime, or residue. Drain(s) function properly.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor cosmetic surface wear such as light discoloration, faint mineral spotting, or slight fading on fountain or sink surfaces that do not indicate damage or water quality concern.	A drinking fountain basin shows faint water spots from daily use, but the fixture is clean, operable, and water runs clear.
Superficial blemishes on hardware or mounting surfaces, including small scratches, worn paint, or marks that do not affect operation or sanitation.	The push-button on a drinking fountain has a small cosmetic scratch but depresses normally and dispenses water properly.
Minor dirt or residue buildup around fixtures where cleaning is slightly overdue but function, drainage, and access remain unaffected.	A classroom sink has light soap residue on the rim that will wipe off with routine cleaning. The faucet and drain operate normally.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor functional issues that do not prevent use, such as water pressure slightly above or below expected levels or handles beginning to loosen.	The outdoor drinking fountain's water pressure is lower than normal but still reaches the mouth guard and remains usable.
Small leaks or moisture presence that has not yet caused damage or pooling but signals early plumbing wear.	A sink faucet has an occasional drip at the base; the surrounding countertop remains dry and no staining is present.
Minor cleanliness concerns such as early mineral deposits, mild staining, or slight buildup around drains that require cleaning but do not impede water flow.	A classroom sink shows early lime buildup around the drain, but water flows normally and no clogging or odor is present.
Minor accessibility issues where fixtures are slightly obstructed but remain reachable, not fully blocked.	A trash bin is placed near a drinking fountain, narrowing but not blocking access. Users can still reach and operate the fountain.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Fixture not fully operational.	Clogged fountain, low or inconsistent water pressure, fixture is turned off or not working.
Active leak or drainage problem.	Water pooling, visible dripping from pipes, moisture causing wall/floor stains.
Fixture damage affecting usability.	Missing button/knob, broken mounting, loose fixture, damaged nozzle or mouth guard.
Significant cleanliness concerns.	Moss, mold, grime buildup. Fountain filled with debris. Water comes out unclear.
Accessibility failure.	Fixture fully blocked or not reachable by students or staff.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Severe health or safety hazard.	Water contamination concerns (unclear, discolored, with odor). Standing water from major leak.
Fixture failure presenting immediate risk.	Exposed internal components, broken, sharp metal edges, fountain causing slip hazard due to flooding.
Major structural plumbing failure.	Significant leak tied to plumbing system, related sewer backup affecting the fixture.

General Illustrative Examples*

*OPSC anticipates developing supplemental captions for the respective pictures, delineating examples of “OK”, “CD”, “MD”, “D”, and “X” at a future stakeholder meeting. Pictures listed here are not reflective of actual school sites, these are for illustrative purposes only.

Chapter 11: Fire Safety

Fire Safety - Good Repair Standard

The fire equipment and emergency systems appear to be functioning properly.
Examples include but are not limited to the following:

a. The fire sprinklers appear to be in working order (e.g., there are no missing or damaged sprinkler heads). (X)
b. Emergency alarms appear to be functional. (X)
c. Emergency exit signs function as designed; exits are unobstructed. (X)
d. Fire extinguishers are current and placed in all required areas.
e. Fire alarm pull stations are clearly visible.
f. Other

Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips

- Review sprinkler heads for damage, missing heads, or painted heads.
- Check for blocked exits, damaged or non-functioning exit signs, and visibility of exit paths.
- Verify fire extinguishers are mounted, accessible, charged, and have current inspection tags.
- Ensure fire alarm pull stations are uncovered and unobstructed.
- Be alert for smoke, flames, hot surfaces, or other immediate safety hazards.
- Note: Areas without fire equipment (fields, playgrounds, courts) may be marked NA.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Fire sprinklers appear intact and unobstructed.	No missing or damaged heads; no items hung from sprinkler pipes; sprinkler areas clear
Emergency alarms appear functional and undamaged.	Control panels show normal status; no warning lights; no visible broken devices
Exit signs fully visible and functioning as designed.	Illuminated signage operational; battery backup functioning; exit pathways unobstructed
Fire extinguishers properly maintained.	Current inspection tags; cabinet or mounting intact; extinguisher not blocked; correct locations per design
Pull stations visible and accessible.	Not covered by furniture or decorations; mounted at appropriate height

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor surface smudges, dust, or superficial marks on extinguisher cabinets, alarm casings, or exit sign housings that do not affect visibility or functionality.	The metal cabinet around a fire extinguisher has fingerprint marks from frequent use, but the extinguisher is fully accessible, clearly visible, and properly inspected
Faded paint, minor scratches, or worn labels on fire-related signage or covers that do not reduce clarity or compliance.	A “Fire Door – Keep Closed” sign shows slight fading at the edges but is still fully readable and posted correctly
Slight cosmetic wear on sprinkler escutcheon rings or surrounding ceiling tile surfaces, unrelated to leak indicators or mechanical damage.	A sprinkler’s trim ring is slightly discolored due to age but sits flush, and the sprinkler head remains intact and unobstructed

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor obstructions that do not prevent access to fire equipment or exits but reduce preferred clearance.	A rolling supply cart is temporarily parked near, but not blocking, a pull station. The station is still reachable and visible.
Low-level lighting or signage issues such as a flickering exit sign or weakening battery indicator where function remains intact.	An exit sign emits a soft flicker but remains illuminated and readable. Maintenance is needed to avoid further degradation.
Dust or early debris accumulation around fire safety components that does not impede operation but indicates that cleaning or servicing is needed.	Dust buildup is visible on an alarm sensor casing, although the device remains fully functional with no trouble indicators.
Minor misalignment or wear on fire sprinklers or protective components that does not affect system performance.	A sprinkler cover plate sits slightly off-center but the sprinkler head is undamaged, unobstructed, and aligned properly.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Operational issues requiring correction.	Fire extinguisher missing tag or slightly undercharged. Exit sign light nonfunctional but signage still visible.
Obstructions affecting safety pathways.	Boxes partially blocking exit routes. Pull station blocked by movable equipment.
Damaged fire equipment.	Cracked extinguisher case. Damaged alarm sensor cover. Fire sprinkler head painted or slightly bent.
Nonfunctioning components.	Exit sign not lighting. Alarm device showing trouble or fault condition.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Severe fire safety hazards posing immediate danger.	Majority of fire extinguishers out of date or missing tags. Sprinkler heads missing or significantly damaged. Emergency exit blocked. Exit sign not functioning at all.
Alarm system in failure condition.	Alarm system showing active fault, device failure, or unresponsiveness.
Obstruction of critical emergency features.	Fire alarm pull station fully covered or blocked. Exit door inaccessible.
Immediate hazards (smoke, flames, extremely hot surfaces).	Active fire indicators. Smoke presence. Overheated electrical or mechanical components.

General Illustrative Examples*

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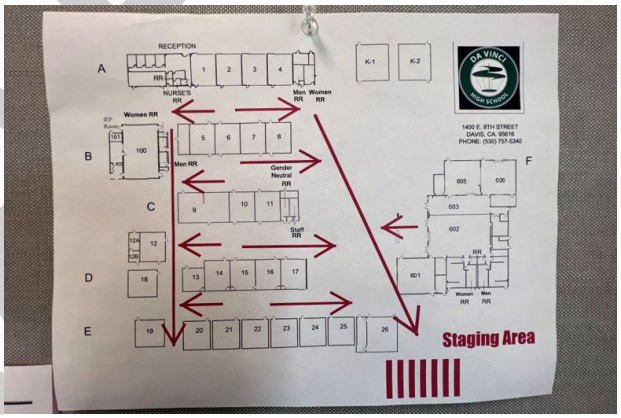

Chapter 12: Hazardous Materials (Interior and Exterior)

Hazardous Materials - Good Repair Standard

There does not appear to be evidence of hazardous materials that may pose a threat to pupils or staff. Examples include but are not limited to the following:

a. Hazardous chemicals, chemical waste, and flammable materials are stored properly (e.g., locked and labeled). (X)
b. Paint is not peeling, chipping, or cracking.
c. There does not appear to be damaged tiles or other circumstances that may indicate asbestos exposure.
d. Surfaces (including floors, ceilings, walls, window casings, HVAC grills) appear to be free of mildew, mold odor, and visible mold.
e. Other.

Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips

- Check for unlabeled chemicals, unsecured cabinets, or hazardous materials left out.
- Inspect walls, ceilings, and tiles for signs of asbestos-related deterioration (friable material).
- Look for evidence of visible mold, mold odor, dampness, or past water intrusion.
- Verify chemical storage rooms are locked and ventilation appears functional.
- Confirm that flammable storage cabinets close properly.
- Note: Outdoor grounds without hazardous storage may be marked NA.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Hazardous materials safely stored and no signs of exposure.	Chemicals locked and labeled; flammable materials secured in approved cabinets; no peeling or cracking paint; tiles intact with no asbestos indication; surfaces free of mold, mildew, or odor
Custodial and lab storage rooms properly maintained.	Chemicals stored by hazard class; acids and bases stored separately; chemical containers intact; spill kits available; compressed gas cylinders secured

Examples of Good Repair Standard (OK) (cont.)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Specialized learning environments conditions.	Tools stored properly. Personal protective equipment (PPE) readily available for students and staff. Cleaning products are appropriately stored. Safety signs related to hazardous materials are properly displayed and clearly visible. Equipment is stored properly and in good working condition. No exposed blades or pinch points for students or staff. Compressed gas cylinders are secured.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor paint wear, fading, or small chips on interior surfaces not associated with hazardous materials or asbestos-containing tiles.	A section of wall paint is lightly scuffed near a custodial sink area, but there is no peeling, chipping, or flaking that would indicate lead-based paint exposure or deterioration.
Superficial dust, smudges, or slight discoloration on shelving or cabinetry in chemical storage rooms unrelated to hazardous residue.	The surface of a chemical storage shelf has a faint dust layer, easily wiped off, with no signs of chemical spills, odors, or unsafe storage conditions.
Minor cosmetic imperfections such as worn labels or faded markings on non-hazardous containers or non-critical equipment.	A spray bottle containing a neutral cleaning solution has a faded label, but the material is not hazardous and the bottle is stored appropriately.
Specialized learning environments conditions.	Single missing PPE item (e.g., one damaged pair of goggles) if alternatives are available. Safety signs related to hazard materials are not properly displayed and/or not clearly visible. Minor misalignment of equipment guards without exposing dangerous components. Single missing PPE item (e.g., one damaged pair of goggles) if alternatives are available.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor clutter or disorganization in storage areas that does not involve hazardous chemicals but could make proper safety checks or access more difficult.	A few non-hazardous cleaning products are stored haphazardly on a chemical room shelf, making it slightly harder to quickly locate labeled hazardous materials stored nearby.
Early paint wear, minor chips, or initial signs of surface aging near areas where hazardous materials are stored, but with no indication of lead, asbestos, or hazardous exposure.	A small chip is visible in the corner of a wall near a chemical cabinet, but surrounding paint and tile are intact, and no hazardous materials are stored in that location.
Slightly musty odor in a storage room without visible mold or dampness, suggesting early ventilation or moisture concerns needing monitoring.	A custodial supply room that stores some chemical products has a mild odor, though all surfaces appear dry and no mold is present - improved air circulation is recommended.
Incorrect or incomplete labeling on non-hazardous containers that does not present a safety risk but is out of alignment with proper storage practices.	A bottle of diluted soap solution lacks a clear, updated label, even though it contains no hazardous substances and is stored safely.
Specialized learning environments conditions.	Non-critical storage systems (e.g., shelving, tool racks) beginning to loosen or tilt but still supporting materials safely. Early instability in equipment guards or shields (e.g., loose attachment points) though dangerous components remain fully covered. Multiple PPE items disorganized or partially depleted, though minimal quantities remain available for safe instruction.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Improper storage or early hazardous conditions requiring correction.	Unlocked chemical cabinets, flammable materials not stored in flammable lockers, damaged tiles suggesting potential asbestos, small visible mildew patches, pesticides or aerosols found on campus.

Examples of Moderate Deficiencies (D) (cont.)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Poor storage practices creating moderate risk	Chemicals stored too closely together, containers showing minor leakage (crystals or stains), partially obstructed ventilation in storage areas.
Specialized learning environments conditions.	Missing equipment guards exposing blades or moving parts. Damaged PPE supply preventing proper student use. Extension cords used as permanent wiring; overloaded circuits. Moderate oil spills, blocked emergency exits, or obstructed safety equipment. Loose automotive lift bolts; worn welding leads; cracked tool handles. Unsecured compressed gas cylinders (e.g., argon, acetylene).

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Hazardous material conditions posing immediate danger.	Chemical spill creating exposure risk. Significant visible mold in occupied areas. Damaged asbestos-containing material shedding fibers. Unlocked hazardous waste accessible to children
Severe mismanagement of flammables or corrosives.	Flammable liquids stored outside approved cabinets. Unsecured compressed gas cylinders posing ignition risk. Evidence of chemical fumes or strong odor indicating acute exposure.

General Illustrative Examples*

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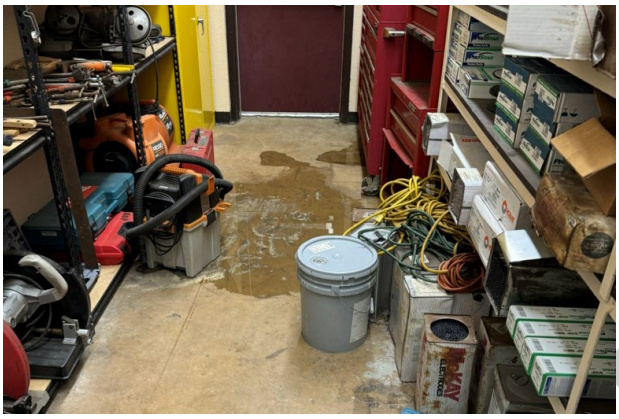
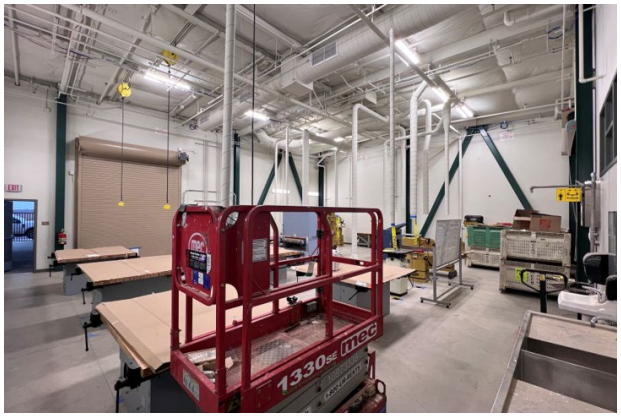




Chapter 13: Structural Damage

Structural Damage - Good Repair Standard

There does not appear to be structural damage that has created or could create hazardous or unsafe conditions. Examples include but are not limited to:

a. Severe cracks are not evident. (X)
b. Ceilings & floors are not sloping or sagging beyond their intended design. (X)
c. Posts, beams, supports for portable classrooms, ramps, and other structural building members appear to be intact, secure, and functional as designed. (X)
d. There is no visible evidence of severe cracks, dry rot, mold, or damage that undermines the structural components. (X)
e. Other

Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips

- Inspect foundations for large cracks or shifting.
- Check portable ramps and supports for dry rot or detachment.
- Review ceilings and floors for movement, sagging, or softness.
- Look at load-bearing walls and posts for structural separation or splitting.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
No structural damage creating unsafe conditions.	No severe cracks, floors are level, ceilings are intact, beams/posts secure; no dry rot; surfaces free of mold.
Structural systems appear sound.	Ramps and portable supports are intact. There is no bowing walls, no ceiling deflection, and doors/windows are aligned properly.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor surface cracks or hairline fractures in walls/ceilings that appear to be related to paint shrinkage, settling, or aging of finishes, no structural movement.	A hairline crack running along a classroom wall's paint surface appears shallow and does not penetrate deeper layers. The wall is stable, and no sagging or leaning is present.

Examples of Cosmetic Deficiencies (CD) (cont.)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Slight cosmetic warping or unevenness on non-load-bearing surfaces, trim pieces, or decorative wall panels that does not indicate stress on structural members.	A decorative wooden trim board on a hallway wall shows mild warping at the edge due to humidity, but adjacent structural components remain fully intact and secure.
Minor paint wear, smudges, fading, or small chips on structural surfaces where there is no accompanying crack, moisture damage, mold, or dry rot.	A column casing has chipped paint from normal foot-traffic wear, but the underlying support structure is solid, aligned, and free from deterioration.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor structural wear such as small, shallow cracks or slight unevenness in flooring that does not indicate underlying load-bearing failure.	A classroom floor feels slightly uneven in one corner but shows no sloping or sagging. Inspectors note the condition for monitoring.
Early signs of moisture exposure such as light ceiling staining or minor discoloration that does not indicate active water intrusion, rot, or mold.	A ceiling tile shows a faint stain from a previously repaired leak. The area where the stain is located is dry, and there is no warping or bubbling.
Minor misalignment or slight shifting of non-load-bearing components (e.g., trim, surface paneling, or decorative posts) without any structural impact.	A decorative wall panel near an interior door is slightly offset from its frame, but the door frame and underlying wall remain structurally sound and unmoved.
Minimal settling cracks in stable, non-critical areas that require observation but do not affect structural integrity or safety.	A superficial crack near the top of a wall appears unchanged over time and does not run along load-bearing areas, indicating normal settling.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Structural issues requiring repair.	Deep cracks that need evaluation. Visible dry rot on structural members. Ceilings or floors are uneven, or damaged posts or supports that are not yet failing.
Components showing weakening.	Wet or damaged subflooring. Sagging portions of ceiling, warped wall panels, or separation between structural joints.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Severe structural hazards posing immediate danger.	Severe cracks indicate structural failure. Sagging or collapsing ceiling/floor. Split or failing beams/posts. There is major wall separation.
Conditions signaling imminent collapse.	Sloping floors causing unsafe movement. Structural members visibly bending or buckling. Foundation separation is posing a collapse risk.

General Illustrative Examples*

*OPSC anticipates developing supplemental captions for the respective pictures, delineating examples of “OK”, “CD”, “MD”, “D”, and “X” at a future stakeholder meeting. Pictures listed here are not reflective of actual school sites, these are for illustrative purposes only.






Chapter 14: Roofs (observed from the ground, inside/outside the building)

Good Repair Standard

Roof systems appear to be functioning properly. Examples include but are not limited to the following:

a. Roofs, gutters, roof drains, and down spouts are free of visible damage.
b. Roofs, gutters, roof drains, and down spouts are intact.
c. Other

Inspection Tips

- Observe roofs from the ground for lifted shingles, missing tiles, or gaps.
- Inspect gutters and downspouts for debris, blockages, and corrosion.
- Check inside ceilings for water stains, moisture, or sagging.
- Confirm drainage points are clear and functional.
- Review portable classroom rooflines closely.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Roof systems are functioning properly.	Roofs are free of visible damage. Gutters and downspouts are intact, roof drains are clear, there are no ceiling water stains, and flashing appears secure.
Drainage works as designed.	Downspouts are connected. There is no pooling water around foundations. There is no visible sagging and roof edges are sealed.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor debris accumulation on roof edges, gutters, or drains that does not interfere with water flow or drainage	A small amount of leaves are visible within the gutter but water still flows freely to the downspout. There is no overflow or staining is present.
Light discoloration, fading, or minor surface wear on shingles, tiles, or roof coatings that does not indicate damage or water intrusion.	A few shingles show mild fading from sun exposure, but all remain firmly attached and fully sealed against weather.
Slight aesthetic imperfections in flashing or sealant, such as minor scuffing or uneven coloration, where flashing remains fully intact and functional.	The metal flashing at a roof edge shows small cosmetic scratches but continues to sit flush and is sealed.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Small debris buildup or partial obstruction in gutters or downspouts that slightly slows drainage but does not yet cause pooling, overflow, or water damage.	Early sediment buildup in a downspout reduces water flow during heavy rainfall but has not yet caused exterior staining or overflow.
Minor roof surface wear such as slight lifting of shingles or tiles in limited areas without exposing underlayment or structure.	A single shingle corner is slightly lifted from wind exposure but remains fully nailed and does not expose decking.
Residual or fully resolved leak stains that indicate past roof issues now repaired, with no active moisture or soft spots present.	A faint brown stain on an interior ceiling tile remains from a leak repaired earlier in the year; the tile is dry and there is no bubbling, warping, or ongoing intrusion.
Minor deterioration of sealant, flashing, or waterproofing materials that does not yet compromise the roof system.	A roof vent has early cracking in its sealant ring, but it is still fully attached and watertight. Resealing may be needed.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Damages needing correction.	Loose gutters, cracked downspouts, active leak indicators (ceiling stains), areas with ponding water, or damaged shingles/tiles.
Conditions reducing roof performance.	Blocked drainage, causing an overflow. Visible warping in roof plywood, or damaged or missing flashing.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Extreme roof hazards posing immediate danger.	There are missing roof sections, or there is a severe active leak causing indoor water intrusion. There is ceiling collapse risk from roof failure, or structural roof failure is visible from inside.
Roof failure compromising safety.	There is an exposed underlying roof deck or major sagging indicating imminent collapse. Extensive rot in roof supports.

General Illustrative Examples*

*OPSC anticipates developing supplemental captions for the respective pictures, delineating examples of “OK”, “CD”, “MD”, “D”, and “X” at a future stakeholder meeting.






Chapter 15: Playground/School Grounds

Good Repair Standard

The playground equipment and school grounds in the vicinity of the area being evaluated appear to be clean, safe, and functional. Examples include but are not limited to the following:

a. Significant cracks, trip hazards, holes and deterioration are not found.
b. Open “S” hooks, protruding bolt ends, and sharp points/edges are not found in the playground equipment.
c. Seating, tables, and equipment are functional and free of significant cracks.
d. There are no signs of drainage problems, such as flooded areas, eroded soil, water damage to asphalt, or clogged storm drain inlets.
e. Other

Inspection Tips

- Inspect turf, asphalt, and concrete for cracks or holes.
- Check playground structures for loose hardware, rust, or rough edges.
- Evaluate drainage areas after rainfall.
- Observe fencing and ground coverings for safety hazards.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
School grounds and equipment safe and functional.	No significant cracks within the playground equipment. There are no trip hazards, no protruding bolt ends, and no sharp edges. Benches/tables are intact and drainage is functioning.
Equipment operating as designed.	Swings are secure, slides are intact, climbing structures are stable, fall zones are unobstructed.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor wear, fading, or superficial paint loss on playground equipment, tables, benches, or ground markings that does not affect integrity or safe use of equipment.	The painted game lines on the blacktop are lightly faded, but remain visible and do not impact student play or safe movement.

Examples of Cosmetic Deficiencies (CD) (cont.)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Small cosmetic scratches or surface scuffs on equipment, railings, or seat edges that do not expose sharp points or compromised material.	A slide ladder shows minor scuffing from normal use, but all rungs remain secure, smooth, and safe for students.
Minor aesthetic imperfections on hardscape or groundcover such as light discoloration, small patches of worn grass, or superficial blemishes unrelated to drainage or stability.	A grassy playfield shows light wear in high-traffic zones but no holes, uneven areas, or signs of poor drainage.

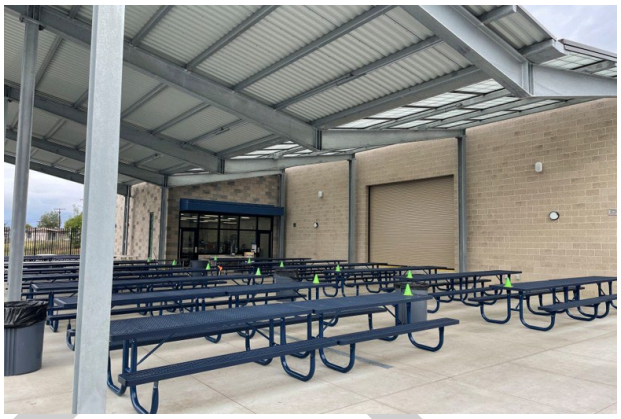
Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Small surface cracks in asphalt or concrete that do not create trip hazards or structural concerns but indicate early wear.	A narrow crack appears along the edge of the blacktop near the basketball court. The surface remains even and safe for use.
Slight wear or loosening of playground equipment components that does not impact safe operation.	A swing chain connector shows mild wear but continues to hold securely such that monitoring and lubrication are recommended.
Minor erosion or settlement in non-play areas that does not impede activity or create hazardous conditions.	A small patch of soil near a landscaped border has washed away slightly after rain, though walk paths and play zones remain stable.
Bushes or vegetation lightly intruding into walk paths or play edges without restricting movement or creating blind spots.	A shrub extends slightly into a walkway but does not obstruct visibility, movement, or equipment access.
Small puddles or minor water accumulation during irrigation that does not indicate drainage system failure.	A shallow puddle forms briefly after sprinkler cycles near a grass edge but clears quickly and is not present during normal student use.

Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Ground hazards that require repair.	Loose bolts on playground structures; larger cracks creating trip hazards; uneven walkways; drainage issues causing soil erosion
Equipment deterioration is impacting use.	There are cracked seats or table surfaces, worn edging on play structures. There is an inadequate fall zone surfacing in small areas.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Severe hazards posing immediate danger.	There are open “S” hooks on equipment, exposed bolt ends or sharp metal edges, severe erosion or sinkholes, or flooded play areas.
Fencing or barriers failing in ways that expose students to danger.	There is a broken gate accessing street, a collapsed retaining wall near play area, or unstable climbing equipment.

General Illustrative Examples*

*OPSC anticipates developing supplemental captions for the respective pictures, delineating examples of “OK”, “CD”, “MD”, “D”, and “X” at a future stakeholder meeting.



Chapter 16: Windows/Doors/Gates/Fences (Interior and exterior)

Good Repair Standard

Conditions that pose a safety and/or security risk are not evident. Examples include but are not limited to the following:

a. There is no exposed broken glass accessible to pupils and staff. (X)
b. Exterior doors and gates are functioning and do not pose a security risk. (X)
c. Windows are intact and free of cracks.
d. Windows are functional and open, close, and lock as designed, unless there is a valid reason they should not function as designed.
e. Doors are intact.
f. Doors are functional and open, close, and lock as designed, unless there is a valid reason they should not function as designed.
g. Gates and fences appear to be functional.
h. Gates and fences are intact and free of holes and other conditions that could present a safety hazard to pupils, staff, or others.
i. Other

Note: For any statement listed in the Part I: Good Repair Standard section of the FIT that is underlined and is not true, this is an extreme deficiency (X).

Inspection Tips

- Check locks, hinges, seals, and handles for proper operation.
- Ensure all gates latch securely and open/close without obstruction.
- Walk fence lines for gaps, breaks, rust, or holes.
- Inspect windows for cracks, balance issues, or broken latches.
- Confirm security hardware is present and intact.

Examples of Good Repair Standard (OK)	
Condition Description	**Inspector Evaluation Example Comments(s)**
All access and security points function properly.	Windows open/close/lock properly, doors latch properly. Gates are secure, fences are intact. There are no cracked windows. Hinges are functioning.
Exterior access points perform safely.	Perimeter gates are aligned, fence panels are stable, door closers are functioning, and screens are intact.

Examples of Cosmetic Deficiencies (CD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Minor scratches, scuff marks, or worn paint on doors, window frames, gates, or fencing that do not affect their ability to open, close, latch, or secure.	A classroom door shows superficial scratches from daily use, but it opens, closes, and locks properly and presents no hazard.
Small cosmetic blemishes or discoloration on seals, trims, or hardware (handles, hinges, latches) that do not impair function.	A window latch has minor surface wear but remains fully operable and continues to lock securely.
Light wear on fence or gate surfaces, such as fading, weathering, or superficial rust, that does not compromise integrity or create sharp edges.	A perimeter fence section appears mildly faded from sun exposure, but no holes, protrusions, or structural concerns are present.
Slight marks or abrasions on floors/asphalt in the swing arc of doors or gates that do not indicate misalignment or create trip hazards.	Wear marks appear near the swing path of an exterior gate but do not affect its movement or safety.

Examples of Minor Deficiencies (MD)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Loose or slightly sticky door locks, latches, or handles that remain functional but require adjustment or lubrication.	A classroom door latch sticks slightly when pressed but still closes and locks; maintenance is needed to restore smooth operation.
Minor rust spots or early corrosion on metal gate or fence components that do not create holes or structural weakness.	A gate hinge shows small patches of surface rust but continues to support the gate properly with no risk of detachment.
Slight misalignment of windows or doors that still open and close, but with reduced smoothness or minor resistance.	A classroom window requires slightly more pressure to slide open but remains fully functional and locks securely once closed.

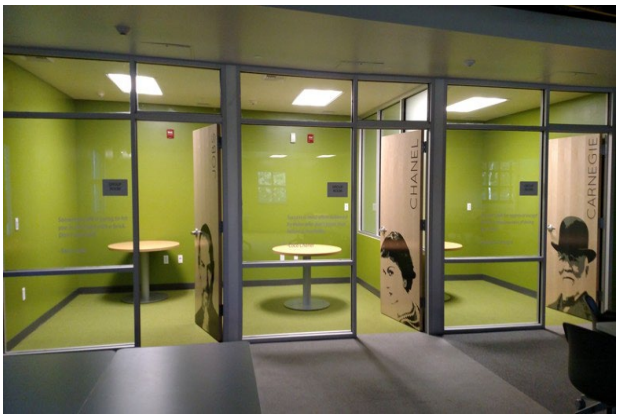
Examples of Minor Deficiencies (MD) (cont.)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Screens or non-critical components (e.g., weather stripping, trims) beginning to loosen or show early wear, but not yet impacting security or allowing pest entry.	A window screen has a loose corner but remains intact and in place, with no gaps large enough for pests to enter.
Minor wear on thresholds or gate/fence surfaces not yet creating tripping hazards or structural concerns.	A door threshold shows early signs of wear but remains firmly attached and level with adjacent flooring.

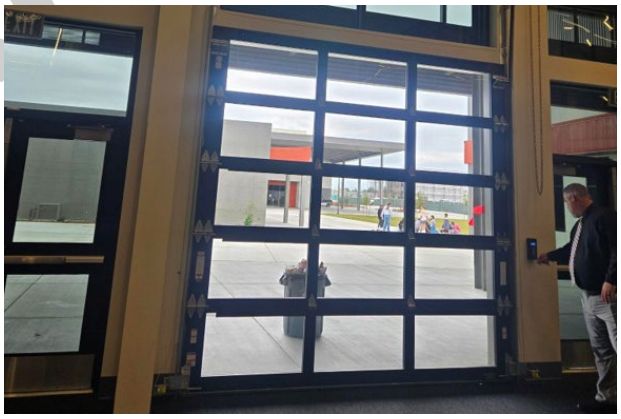
Examples of Moderate Deficiencies (D)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Access/security deficiencies requiring repair.	Window latches are faulty. Doors are difficult to close, there are misaligned gates, small holes in fencing, and broken door handles.
Structural access problems.	Warped doors reduce the ability to close the door fully, fence panels are loose, gates are dragging on ground, or locks are damaged.

Examples of Extreme Deficiencies (X)	
Condition Description	**Inspector Evaluation Example Comments(s)**
Serious access/security failures posing immediate danger.	Broken windows are creating a hazard for staff and students, doors are not locking at all, gates are unable to secure campus perimeter, large fence breaches enable potential unauthorized access.
Components compromised beyond safe use.	There are fully inoperable emergency exits. There is a fence collapse near student pathways. There are severely damaged door frames preventing closure.

General Illustrative Examples*

*OPSC anticipates developing supplemental captions for the respective pictures, delineating examples of “OK”, “CD”, “MD”, “D”, and “X” at a future stakeholder meeting.





Appendices

Statutory Authority

Education Code (EC) Section 1240
The county superintendent of schools shall do all of the following:
(a) Superintend the schools of that county.
(b) Maintain responsibility for the fiscal oversight of each school district in that county pursuant to the authority granted by this code.
(c) (1) Visit and examine each school in the county at reasonable intervals to observe its operation and to learn of its problems. The county superintendent of schools annually may present a report of the state of the schools in the county, and of the county office of education, including, but not limited to, observations from visiting the schools, to the board of education and the board of supervisors of the county.
(2) (A) (i) Commencing with the 2021–22 fiscal year, the Superintendent shall identify a list of schools, which shall include charter schools, for which the county superintendent, or a designee, shall inspect annually, and about which the county superintendent, or a designee, shall submit an annual report, at a regularly scheduled November board meeting, to the governing board of each school district under the jurisdiction of the county superintendent, the county board of education of that county, and the board of supervisors of that county, that describes the state of the schools in the county. The list established in the 2021–22 fiscal year shall also be used as the list established in the 2022–23 and 2023–24 fiscal years. The list of schools established pursuant to this section shall be reestablished in the 2024–25 fiscal year and again every three fiscal years thereafter. Each list shall be established in accordance with clause (ii), and shall be used for inspections beginning the following fiscal year.
(ii) The list of schools pursuant to clause (i) shall be compiled as follows:
(I) The Superintendent shall include on the list all schools that were most recently identified for comprehensive support and improvement and additional targeted support and improvement pursuant to the federal Every Student Succeeds Act (Public Law 114-95) or identified as low performing under the federal Elementary and Secondary Education Act of 1965 (Public Law 89-10), or any subsequent amendments to that act. For the list established in the 2021–22, 2022–23, and 2023–24 fiscal years, the Superintendent shall use the list of schools identified in the 2019–20 fiscal year for comprehensive support and improvement and for additional targeted support and improvement.
(II) The Superintendent shall include on the list all schools where 15 percent or more of the teachers are holders of a permit or certificate, such as a temporary or short-term permit, a substitute permit, a waiver, an intern credential, or any other authorization that is a lesser certification than a preliminary or clear California teaching credential. With the exception of alternative schools, all schools within a local educational agency that fail to meet the requirements of Sections 44258.9 and 60900 shall be included on the list for the applicable reporting cycle.
(III) The list of schools compiled pursuant to clause (i) shall exclude alternative schools within the meaning of subdivision (d) of Section 52052 and other schools accepted for participation in the Dashboard Alternative School Status program by the department.
(iii) The annual report shall include the determinations for each school made by the

county superintendent, or the county superintendent's designee, regarding the status of all of the circumstances listed in subparagraph (E) and teacher misassignments and teacher vacancies, as described in Section 44258.9, and the county superintendent, or the county superintendent's designee, shall use a standardized template to report the circumstances listed in subparagraph (E) and teacher misassignments and teacher vacancies, as described in Section 44258.9, unless the current annual report being used by the county superintendent, or the county superintendent's designee, already includes those details with the same level of specificity that is otherwise required by this subdivision.

(B) The county superintendent of the Counties of Alpine, Amador, Del Norte, Mariposa, Plumas, and Sierra, and the City and County of San Francisco shall contract with another county office of education or an independent auditor to conduct the required visits and make all reports required by this paragraph.

(C) On a quarterly basis, the county superintendent, or the county superintendent's designee, shall report the results of the visits and reviews conducted that quarter to the governing board of the school district at a regularly scheduled meeting held in accordance with public notification requirements. The results of the visits and reviews shall include the determinations of the county superintendent, or the county superintendent's designee, for each school regarding the status of all of the circumstances listed in subparagraph

(E) and teacher misassignments and teacher vacancies, as described in Section 44258.9. If the county superintendent, or the county superintendent's designee, conducts no visits or reviews in a quarter, the quarterly report shall report that fact.

(D) The visits made pursuant to this paragraph shall be conducted at least annually and shall meet the following criteria:

(i) Minimize disruption to the operation of the school.

(ii) Be performed by individuals who meet the requirements of Section 45125.1.

(iii) Consist of not less than 25 percent unannounced visits in each county. During unannounced visits in each county, the county superintendent shall not demand access to documents or specific school personnel. Unannounced visits shall only be used to observe the condition of school repair and maintenance, and the sufficiency of instructional materials, as defined by Section 60119.

(E) The priority objective of the visits made pursuant to this paragraph shall be to determine the status of all of the following circumstances:

(i) Sufficient textbooks, as defined in Section 60119 and as specified in subdivision (i).

(ii) The condition of a facility that poses an emergency or urgent threat to the health or safety of pupils or staff, as described in school district policy or paragraph (1) of subdivision (c) of Section 17592.72.

(iii) The accuracy of data reported on the school accountability report card with respect to the availability of sufficient textbooks and instructional materials, as defined by Section 60119, and the safety, cleanliness, and adequacy of school facilities, including good repair, as required by Sections 17014, 17032.5, 17070.75, and 17089.

(F) The county superintendent may make the status determinations described in subparagraph (E) during a single visit or multiple visits. In determining whether to make a single visit or multiple visits for this purpose, the county superintendent shall take into

consideration factors such as cost-effectiveness, disruption to the schoolsite, deadlines, and the availability of qualified reviewers.
(G) If the county superintendent determines that the condition of a facility poses an emergency or urgent threat to the health or safety of pupils or staff as described in school district policy or paragraph (1) of subdivision (c) of Section 17592.72, or is not in good repair, as specified in subdivision (d) of Section 17002 and required by Sections 17014, 17032.5, 17070.75, and 17089, the county superintendent, among other things, may do any of the following:
(i) Return to the school to verify repairs.
(ii) Prepare a report that specifically identifies and documents the areas or instances of noncompliance if the school district has not provided evidence of successful repairs within 30 days of the visit of the county superintendent or, for major projects, has not provided evidence that the repairs will be conducted in a timely manner. The report may be provided to the governing board of the school district. If the report is provided to the school district, it shall be presented at a regularly scheduled meeting held in accordance with public notification requirements. The county superintendent shall post the report on the internet website of the county superintendent. The report shall be removed from the internet website when the county superintendent verifies the repairs have been completed.
(H) For schools that are identified on the list established in the 2024–25 fiscal year pursuant to subparagraph (A), and only in the fiscal years in which that list is used, a county superintendent shall complete the textbook and instructional materials review conducted for purposes of this paragraph and subparagraph (A) of paragraph (3) of subdivision (i) by the eighth week of the school year. The county superintendent shall prioritize reviewing, within the first four weeks of the school year where practicable, schools for which the county superintendent has received information from a survey, a complaint filed pursuant to Section 35186, or any other reliable source that the school does not have sufficient textbooks, as defined in Section 60119 and as specified in subdivision (i), or that a facility of the school poses an emergency or urgent threat to the health or safety of pupils or staff as described in school district policy or paragraph (1) of subdivision (c) of Section 17592.72, or is not in good repair, as specified in subdivision (d) of Section 17002 and required by Sections 17014, 17032.5, 17070.75, and 17089.
…

EC Section 17002
The following terms wherever used or referred to in this chapter, shall have the following meanings, respectively, unless a different meaning appears from the context:
(a) “Apportionment” means a reservation of funds necessary to finance the cost of any project approved by the board for lease to an applicant school district.
(b) “Board” means the State Allocation Board.
(c) “Cost of project” includes, but is not limited to, the cost of all real estate property rights, and easements acquired, and the cost of developing the site and streets and utilities immediately adjacent thereto, the cost of construction, reconstruction, or modernization of buildings and the furnishing and equipping, including the purchase of educational technology hardware, of those buildings, the supporting wiring and cabling,

and the technological modernization of existing buildings to support that hardware, the cost of plans, specifications, surveys, and estimates of costs, and other expenses that are necessary or incidental to the financing of the project. For purposes of this section, "educational technology hardware" includes, but is not limited to, computers, telephones, televisions, and video recording equipment.

(d) (1) "Good repair" means the facility is maintained in a manner that assures that it is clean, safe, and functional as determined pursuant to a school facility inspection and evaluation instrument developed by the Office of Public School Construction and approved by the board or a local evaluation instrument that meets the same criteria. Until the school facility inspection and evaluation instrument is approved by the board, "good repair" means the facility is maintained in a manner that assures that it is clean, safe, and functional as determined by the interim evaluation instrument developed by the Office of Public School Construction or a local evaluation instrument that meets the same criteria as the interim evaluation instrument. The school facility inspection and evaluation instrument and local evaluation instruments that meet the minimum criteria of this subdivision shall not require capital enhancements beyond the standards to which the facility was designed and constructed. In order to provide that school facilities are reviewed to be clean, safe, and functional, the school facility inspection and evaluation instrument and local evaluation instruments shall include at least the following criteria:

(A) Gas systems and pipes appear and smell safe, functional, and free of leaks.

(B) Mechanical systems, including heating, ventilation, and air-conditioning systems, satisfy the following:

(i) Are functional and unobstructed.

(ii) Appear to supply adequate amount of air to all classrooms, work spaces, and facilities.

(iii) Maintain interior temperatures within normally acceptable ranges.

(C) Doors and windows are intact, functional, and open, close, and lock as designed, unless there is a valid reason they should not function as designed.

(D) Fences and gates are intact, functional, and free of holes and other conditions that could present a safety hazard to pupils, staff, or others. Locks and other security hardware function as designed.

(E) Interior surfaces, including walls, floors, and ceilings, are free of safety hazards from tears, holes, missing floor and ceiling tiles, torn carpet, water damage, or other cause. Ceiling tiles are intact. Surfaces display no evidence of mold or mildew.

(F) Hazardous and flammable materials are stored properly. No evidence of peeling, chipping, or cracking paint is apparent. No indicators of mold, mildew, or asbestos exposure are evident. There is no apparent evidence of hazardous materials that may pose a threat to the health and safety of pupils or staff.

(G) Structures, including posts, beams, supports for portable classrooms and ramps, and other structural building members appear intact, secure, and functional as designed. Ceilings and floors are not sloping or sagging beyond their intended design. There is no visible evidence of severe cracks, dry rot, mold, or damage that undermines structural components.

(H) Fire sprinklers, fire extinguishers, emergency alarm systems, and all emergency equipment and systems appear to be functioning properly. Fire alarm pull stations are

clearly visible. Fire extinguishers are current and placed in all required areas, including every classroom and assembly area. Emergency exits are clearly marked and unobstructed.
(I) Electrical systems, components, and equipment, including switches, junction boxes, panels, wiring, outlets, and light fixtures, are securely enclosed, properly covered and guarded from pupil access, and appear to be working properly.
(J) Lighting appears to be adequate and working properly. Lights do not flicker, dim, or malfunction, and there is no unusual hum or noise from light fixtures. Exterior lights onsite appear to be working properly.
(K) No visible or odorous indicators of pest or vermin infestation are evident.
(L) Interior and exterior drinking fountains are functional, accessible, and free of leaks. Drinking fountain water pressure is adequate. Fountain water is clear and without unusual taste or odor, and moss, mold, or excessive staining is not evident.
(M) Restrooms and restroom fixtures satisfy the following:
(i) Are functional.
(ii) Appear to be maintained and stocked with supplies regularly.
(iii) Appear to be accessible to pupils during the schoolday.
(iv) Appear to be in compliance with Section 35292.5.
(N) The sanitary sewer system controls odor as designed, displays no signs of stoppage, backup, or flooding, in the facilities or on school grounds, and appears to be functioning properly.
(O) Roofs, gutters, roof drains, and downspouts appear to be functioning properly and are free of visible damage and evidence of disrepair when observed from the ground inside and outside the building.
(P) The school grounds do not exhibit signs of drainage problems, such as visible evidence of flooded areas, eroded soil, water damage to asphalt playgrounds or parking areas, or clogged storm drain inlets.
(Q) Playground equipment and exterior fixtures, seating, tables, and equipment are functional and free of significant cracks, trip hazards, holes, deterioration that affects functionality or safety, and other health and safety hazards.
(R) School grounds, fields, walkways, and parking lot surfaces are free of significant cracks, trip hazards, holes, deterioration that affects functionality or safety, and other health and safety hazards.
(S) Overall cleanliness of the school grounds, buildings, common areas, and individual rooms demonstrates that all areas appear to have been cleaned regularly and are free of accumulated refuse and unabated graffiti. Restrooms, drinking fountains, and food preparation or serving areas appear to have been cleaned each day that the school is in session.
(2) (A) On or before January 1, 2007, the Office of Public School Construction shall develop the school facility inspection and evaluation instrument and instructions for users. The school facility inspection and evaluation instrument and local evaluation instruments that meet the minimum criteria of this subdivision shall include a system that will evaluate each facility, based on the criteria listed in paragraph (1), on a scale of “good,” “fair,” or “poor,” as developed by the Office of Public School Construction, and provide an overall summary of the conditions at each school on a scale of “exemplary,”

"good," "fair," or "poor."
(B) On or before July 1, 2007, the Office of Public School Construction, in consultation with county offices of education, shall define objective criteria for determining the overall summary of the conditions of schools.
(C) For purposes of this paragraph, "users" means local educational agencies that participate in either of the programs established pursuant to this chapter, Chapter 12.5 (commencing with Section 17070.10), or Section 17582.
(e) "Lease" includes a lease with an option to purchase.
(f) "Project" means the facility being constructed or acquired by the state for rental to the applicant school district and may include the reconstruction or modernization of existing buildings, construction of new buildings, the grading and development of sites, acquisition of sites therefor and any easements or rights-of-way pertinent thereto or necessary for its full use including the development of streets and utilities.
(g) "Property" includes all property, real, personal or mixed, tangible or intangible, or any interest therein necessary or desirable for carrying out the purposes of this chapter.
(Amended by Stats. 2009, Ch. 88, Sec. 20. (AB 176) Effective January 1, 2010.)

EC Section 35292.
The governing board of any school district shall visit each school in its district at least once each term, and examine carefully into the management, needs, and conditions of the schools. In any school district which employs district or city superintendents of schools, it shall either visit the schools or provide that they shall be visited by the district or city superintendent of schools or his assistants.
(Enacted by Stats. 1976, Ch. 1010.)

EC Section 35292.5
(a) Every public and private school maintaining any combination of classes from kindergarten to grade 12, inclusive, shall comply with all of the following:
(1) Every restroom shall at all times be maintained and cleaned regularly, fully operational, and stocked at all times with toilet paper, soap, and paper towels or functional hand dryers.
(2) The school shall keep all restrooms open during school hours when pupils are not in classes, and shall keep a sufficient number of restrooms open during school hours when pupils are in classes.
(b) (1) On or before July 1, 2026, each school district, county office of education, and charter school, including charter schools operating in a school district facility pursuant to Section 47614, maintaining any combination of classes from grades 1 to 12, inclusive, shall comply with the following for each of its schoolsites that, before July 1, 2026, has more than one female restroom and more than one male restroom designated exclusively for pupil use, excluding restrooms designated for pupils in transitional kindergarten or kindergarten:
(A) Provide and maintain at least one all-gender restroom for pupil use that meets the following requirements:
(i) Has signage identifying the bathroom facility as being open to all genders and in conformity with Title 24 of the California Code of Regulations.

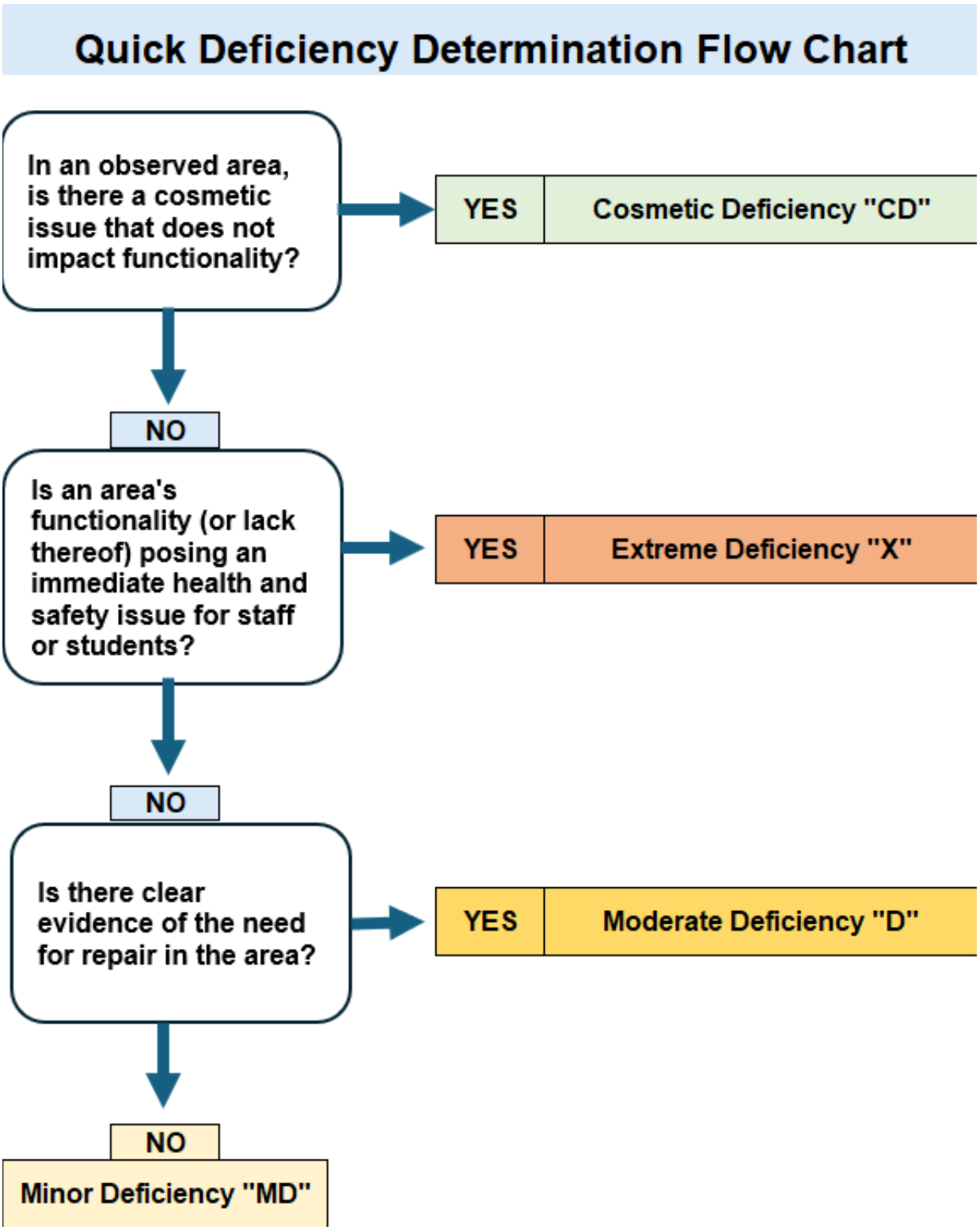
(ii) Is available for pupil use, consistent with the requirements of subdivision (a), as unlocked, unobstructed, easily accessible by any pupil, and consistent with existing pupil access to sex-segregated restrooms.
(iii) Is consistent with the requirements pursuant to Section 35292.6.
(iv) Is available during school hours and school functions when pupils are present.
(B) Designate a staff member to serve as a point of contact for implementation of this section.
(C) Post a notice regarding the requirements of this paragraph in a prominent and conspicuous location outside at least one all-gender restroom, including contact information for the person designated as a point of contact pursuant to subparagraph (B).
(2) A school district, county office of education, or charter school may use an existing restroom to satisfy the requirements of this subdivision if it ensures that all pupils have restrooms that are in easily accessible locations and the existing restroom otherwise complies with the requirements in paragraph (1).
(3) This subdivision shall be subject to compliance review pursuant to Section 253.
(4) The department shall post on its internet website guidance for implementation of this subdivision, including, but not limited to, examples of signage and best practices.
(5) This subdivision shall not supplant subdivision (f) of Section 221.5. Use of an all-gender restroom by a pupil shall be voluntary and pupils shall not be required to use an all-gender restroom.
(6) This subdivision shall not preclude a schoolsite that does not have more than one female restroom and more than one male restroom designated exclusively for pupil use, excluding restrooms designated for pupils in transitional kindergarten or kindergarten, from identifying and making easily accessible, a restroom for pupil use that satisfies the requirements of this subdivision.
(c) Notwithstanding subdivisions (a) and (b), a school may temporarily close a restroom as necessary (1) for a documented pupil safety concern, (2) for an immediate threat to pupil safety, or (3) to repair the facility.
(Amended by Stats. 2023, Ch. 227, Sec. 3. (SB 760) Effective January 1, 2024.)

EC Section 35292.6
(a) On or before the start of the 2024–25 school year, a public school, including a school operated by a school district, county office of education, or charter school, maintaining any combination of classes from grades 3 to 12, inclusive, shall stock the school's restrooms at all times with an adequate supply of menstrual products, available and accessible, free of cost, in all women's restrooms and all-gender restrooms, and in at least one men's restroom.
(b) A public school described in subdivision (a) shall not charge for any menstrual products provided to pupils.
(c) A public school described in subdivision (a) shall post a notice regarding the requirements of this section in a prominent and conspicuous location in every restroom required to stock menstrual products, available and accessible, free of cost, pursuant to this section. This notice shall include the text of this section and contact information, including an email address and telephone number, for a designated individual

responsible for maintaining the requisite supply of menstrual products.
(d) For purposes of this section, “menstrual products” means menstrual pads and tampons for use in connection with the menstrual cycle.
(e) This section shall become operative on July 1, 2024.
(Repealed (in Sec. 2) and added by Stats. 2023, Ch. 421, Sec. 3. (AB 230) Effective January 1, 2024. Operative July 1, 2024, by its own provisions.)

Senate Bill (SB) 129 (Chapter 69, Budget Act of 2021 – Skinner)
SEC. 243.
…
(a) The Office of Public School Construction shall consult with stakeholders such as local educational agency facilities staff, classified employees providing custodial services, certificated employees, local and state public health officials, and other experts in clean, safe, and functional school facilities. The Office of Public School Construction shall consider current standards for school facilities, including, but not limited to, the Association of Physical Plant Administrator’s Operational Guidelines for Educational Facilities and both local and state public health guidance and standards.

(c) The State Allocation Board shall adopt an updated Facility Inspection Tool prior to June 30, 2022, for use beginning July 1, 2022.


Quick Deficiency Determination Flow Chart
In an observed area, is there a cosmetic issue that does not impact functionality?
YES
Cosmetic Deficiency "CD"
NO
Is an area's functionality (or lack thereof) posing an immediate health and safety issue for staff or students?
YES
Extreme Deficiency "X"
NO
Is there clear evidence of the need for repair in the area?
YES
Moderate Deficiency "D"
NO
Minor Deficiency "MD"

To: Michael Watanabe

From: Lance Bidnick

Date: June 30, 2026

Regarding: Proposed Changes to the Facility Inspection Tool (FIT)

The following comments are provided as stakeholder feedback for consideration during the review of potential revisions to the Williams Facility Inspection Tool (FIT). These comments are intended to support improved accountability while identifying potential implementation challenges and opportunities to strengthen the program.

Issue	**Stakeholder Comment / Recommendation**
Purpose of the FIT	Clearly define the purpose of the FIT before expanding its scope. The FIT has historically served as an annual health, safety, and operational inspection to determine whether schools are maintained in good repair. If the intent is to assess long-term facility condition, deferred maintenance, or capital renewal needs, a different assessment tool should be considered.
Scope Creep	Several proposed changes appear to transform the FIT from a practical annual inspection into a comprehensive facility condition assessment. This would significantly increase inspection complexity, required expertise, inspection duration, and implementation costs.
Facility Assessment or Compliance Review	To preserve the integrity of the Williams program, the FIT should remain focused on identifying observable facility conditions affecting whether a school is clean, safe, and functional. Questions requiring technical code interpretation or regulatory compliance determinations should continue to be evaluated by the agencies specifically charged with enforcing those requirements. The FIT should evaluate observable facility conditions that a reasonably trained facilities professional can consistently identify. It should not require inspectors to interpret building codes, fire codes, ADA requirements, Title 24 accessibility

	standards, feminine hygiene dispensers, hazardous materials regulations, or other technical provisions that require specialized training or fall under the jurisdiction of other regulatory agencies.
Implementation Costs	Expanded inspection requirements may require districts and County Offices of Education to hire third-party consultants or specialized inspectors. Consider whether the proposed inspection process remains practical for districts to perform using qualified in-house staff.
Unfunded Mandate	Increasing the number or severity of reportable deficiencies without providing additional funding creates an ongoing financial obligation for districts. Identification of deficiencies should be accompanied by a discussion of how those deficiencies will be funded and corrected.
Alignment with Proposition 2	Rather than expanding the FIT, consider using the Comprehensive Maintenance Plan required under Proposition 2 or using existing SAB forms related to deferred maintenance to document long-term capital deficiencies and deferred maintenance needs. This would better align identified deficiencies with future School Facility Program funding opportunities. The challenge facing schools is that the LCAP is tied to funding, not Williams. With the implementation of the LCFF, categorical programs like Deferred Maintenance were swept into the General Fund and can be a challenge to get reinvesting back to facilities and was not sufficient to address maintenance backlogs.
Managed Deficiencies	Consider allowing districts to document major deficiencies that have been identified, prioritized, and programmed for future correction. This recognizes responsible stewardship while acknowledging funding limitations.
Focus on Consistency	Many concerns identified by the State Auditor relate to inconsistent interpretation of existing standards. Consider emphasizing statewide training, inspector calibration, quality

	assurance, and improved guidance before expanding inspection criteria.
Inspector Training	If inspection criteria become more technical, establish standardized statewide training and certification for district and County Office inspectors to improve consistency and reduce subjective interpretation. Although OPSC may not have the technical expertise or resources for evaluation of building systems, some kind of a training program would be helpful just to review all of the areas subject to inspection. Please consider training on the FIT manual, review each of the inspection areas, what constitutes a deficiency, how to use the FIT form to report information accurately and how to calculate the score. The FIT manual is quite extensive and could be a little cumbersome for inspections to properly understand.
County Office Capacity	Recent Williams legislation has increased the number of schools requiring County Office inspections while extending the duration of eligibility. Evaluate staffing and workload impacts, particularly for smaller County Offices with limited facilities personnel.
Statewide Consistency	County Offices vary significantly in staffing and technical expertise. Additional inspection complexity may increase inconsistencies unless statewide training and calibration are implemented.
Public Reporting	If inspection standards change, clearly distinguish between changes in facility condition and changes in evaluation methodology. Public reports should explain when ratings change because inspection standards became more rigorous rather than because facilities deteriorated.
Credibility of Prior FIT Reports	Districts and governing boards completed prior FIT inspections using State-approved standards. Revised standards should not imply previous reports were inaccurate or misleading. New standards should apply prospectively.

Governance Considerations	Governing boards approved previous FIT reports in good faith based upon existing State guidance. Significant methodology changes should not undermine confidence in prior Board actions or district reporting.
Public Confidence	Lower ratings resulting solely from revised inspection standards could create unnecessary public concern regarding school safety and facility conditions. Standardized statewide communication should accompany implementation of any significant revisions.
Enrollment Impacts	Publicly reported declines in facility ratings may influence parent perceptions and school choice decisions. While qualifying charter schools participate in Williams oversight, private schools do not. Communications should clearly explain when rating changes are attributable to revised standards rather than declining conditions.
Hazardous Materials	Hazardous materials are already regulated by agencies with specialized expertise, including DPR, DTSC, Cal/OSHA, the Office of the State Fire Marshal, local fire authorities, and Certified Unified Program Agencies. Avoid creating overlapping regulatory responsibilities within the FIT.
Hazardous Materials Training	Consider partnering with CDE, DPR, DTSC, Cal/OSHA, and the State Fire Marshal to develop statewide training, guidance documents, and self-assessment checklists rather than expanding FIT inspection requirements.
Alternative Inspection Forms	In order to adopt a local inspection tool that meets the intent of the Williams Act for facility inspections, consider identifying criteria the district must meet for a qualifying inspection tool.
Maintain Current FIT	If a district is unable to perform inspections using the new form, consider whether or not adoption of the new form is required, recommended, suggested or optional. The Education Code clearly states that districts must use an

	inspection form either approved by OPSC or the local school board.
Specialized Training	School employees performing FIT inspections may not be properly trained to know storage requirements for hazardous materials. Providing a detailed inspection form as part of the FIT, district staff may not be qualified to adequately complete those areas.
FIT as a Screening Tool	Continue using the FIT to identify obvious health and safety hazards while relying on the appropriate regulatory agencies to evaluate technical compliance within their respective areas of expertise.
Transition Period	If substantial revisions are adopted, consider a phased implementation including statewide training, inspector calibration, parallel reporting, and public education before revised ratings affect accountability reporting.
Overall Recommendation	Preserve the FIT as an annual operational health, safety, and good repair inspection while strengthening Proposition 2 Comprehensive Maintenance Plans to address long-term capital renewal and deferred maintenance. This approach improves accountability, provides better statewide capital planning information, and minimizes unnecessary administrative burden on districts and County Offices of Education.

July 10, 2026

The Office of Public School Construction
707 3rd Street - Third Floor
West Sacramento, CA 95605

Re: Stakeholder input regarding potential revisions to the Facility Inspection Tool

Dear Mr. Watanabe,

On behalf of the California Association of School Business Officials (CASBO), representing over 30,000 school business leaders statewide, we appreciate the Office of Public School Construction's (OPSC) efforts to update the Facility Inspection Tool (FIT) in response to the State Auditor's recommendations.

Our initial impression is that the potential recommendations discussed thus far would improve the clarity, consistency, and accuracy of facility inspections. Enhancements such as more defined deficiency ratings, expanded guidance and examples, improved documentation of deficiencies and corrective actions, refinements to the scoring methodology, and the optional hazardous materials detail sheet will strengthen the inspection process and result in more meaningful and reliable facility condition data.

These potential recommendations for updating the FIT may also lead to more consistent evaluations across local educational agencies, support informed maintenance planning and decision-making, and enhance transparency in reporting school facility conditions. These updates also advance efforts to support safe, well-maintained learning environments for California's students and staff.

As OPSC continues to refine and update recommendations, we appreciate ongoing collaboration with stakeholders to discuss implementation strategies that balance detail with ease of use while minimizing additional administrative burden. We look forward to continuing our engagement in this process.

Thank you for the opportunity to provide comments. Should you have any questions, please don't hesitate to get in touch with Mishaal Gill at mgill@casbo.org.

Sincerely,

Mishaal Gill
Director of Policy and Advocacy
California Association of School Business Officials

Via Email

July 10, 2026

Rebecca Kirk
Executive Officer
Office of Public School Construction (OPSC)
OPSCCommunications@dgs.ca.gov

Re: Facility Inspection Tool (FIT) Stakeholder Process

Dear Executive Officer Kirk,

Clean Air Allies is a nonprofit organization dedicated to improving indoor air quality in PK-12 schools as a matter of educational, environmental, and health import.

This letter follows our November 14, 2025 letter. We incorporate that letter by reference, reiterate the requests made therein, and offer these additional comments.

1. OPSC's Responses to Our Feedback, Items 1 and 2.

We appreciate OPSC's responses to our prior feedback in the June 25, 2026 stakeholder meeting and related Agenda Item (OPSC, 852-853).

We request that OPSC formally recommend the proposed invitation in Attachment B1f for evaluators to indicate items i. through iii. in the comments (OPSC, 986). However, we request that the surrounding language be revised as we remain concerned about ambiguity concerning the applicability of this section to spaces served by natural versus mechanical ventilation. Notably, while the section heading is "Mechanical Systems," subpoint a., which has been part of the FIT since its original June 2007 iteration, explicitly refers to "mechanical or natural ventilation," and the "adequate air supply" and "temperature" examples are applicable to both.

Adequate ventilation and temperature control should be considered by FIT evaluators, whether a space is served by mechanical or natural ventilation. The State Auditor has proposed revising the FIT scoring system so that it does not involve aggregating sections for category-level reporting (CSA, 53; OPSC, 857-858). With this proposal, which we support, in mind, we would recommend replacing the "Mechanical Systems" heading and updating the section as follows:

> **Ventilation/Temperature**
>
> *Heating, ventilation, and air conditioning (HVAC) systems as applicable are functional and unobstructed.*
>
> *The inspector may indicate in the comments the following:*
>
> *i. Whether an area relies on mechanical or natural ventilation.*
> *ii. Whether a device for monitoring temperature and humidity is present in the area, and what it shows at the time of inspection.*
> *iii. What temperature and humidity extremes are recorded (if available).*

Examples include but are not limited to the following:

a. If present, any HVAC system is operable. (X)
b. The facilities are ventilated (via mechanical or natural ventilation).
c. Any ventilation units are unobstructed and vents and grills are without evidence of excessive dirt or dust.
d. There appears to be an adequate air supply to all classrooms, work spaces, and facilities (i.e. no strong odor is present, air is not stuffy).
e. Interior temperatures appear to be maintained within normally accepted ranges.
f. Any ventilation units are not generating any excessive noise or vibrations.
g. Other

We note that other section headings in the FIT do not exactly mirror the framing of the non-exhaustive criteria in Education Code § 17002. Further, as observed in our prior letter, both the State Auditor and the Department of General Services have recognized the need to improve the accuracy of FIT reporting as paramount. Removing ambiguity, and promoting completeness and uniformity, versus inconsistent "NA" responses, is congruent with this end.

2. Suggested Disclaimer Language about the FIT's Limitations.

We previously suggested that the FIT should contain some form of disclaimer about its limitations given its widespread use as an input in School Accountability Report Cards (SARCs), consistent with Education Code §§ 17002 and 33126. Regarding OPSC's invitation to provide specific disclaimer language (OPSC, 853), we suggest the following as a starting point:

> FIT results may be used as an input in School Accountability Report Cards (SARCs), which provide information about school conditions to the public (EC Section 33126). However, the FIT is, by design, a non-expert, visual inspection tool. As such, it may fail to identify deficiencies in school facilities, including ones that affect health and safety, that are not ascertainable by non-experts or by visual inspection.

3. Feedback on Draft Amendments in Response to the State Auditor's Report 2023-122.

a. The State Auditor proposed that the FIT differentiate between "*cosmetic deficiencies, minor deficiencies, moderate deficiencies, and extreme deficiencies*" (CSA, 53). However, the suggested revisions in the Agenda Item for the June 25 meeting merge "cosmetic deficiencies" and "minor deficiencies" and use "deficiencies" in place of "moderate deficiencies" (OPSC, 855-856). We would appreciate clarification of the reasoning behind this. Moreover, a scale along the lines of "cosmetic deficiencies, moderate deficiencies, serious deficiencies, and extreme deficiencies" would be more instructive, as it distinguishes between cosmetic and functional deficiencies and allows for more meaningful differentiation of severity at the upper end.

b. With respect to guidance for assessment of "specialized learning environments," we would suggest that makerspaces be included (OPSC, 856).

c. The idea of instructing evaluators to indicate an action plan in the comments for individual locations that contain multiple deficiencies is a good one (OPSC, 856-857).

d. Based on the information available to us at this time, we support implementation of the State Auditor's recommendation of adoption of a "scoring system that removes the aggregation of FIT sections into category-level reporting" (CSA, 53; OPSC, 857-858).

e. Additional examples of what constitutes a “hazardous material”—including routine ones such as sanitizing wipes and cleaning sprays—and clarification of the areas where the Hazardous Materials Detail worksheet is intended to be used would be helpful. Substantial portions of the worksheet seem directed at specialized areas (OPSC, 858, 986). However, the State Auditor’s report describes finding hazardous materials in elementary school classrooms (CSA, 15-16, 44-45).

4. The FIT Should Be Seen as a Meaningful Opportunity to Ensure Safe and Healthy School Facilities, Not as a Mere Bureaucratic Hurdle.

Broadly, we reiterate that the FIT should be approached not as a mere bureaucratic hurdle to be cleared but instead as a meaningful opportunity to ensure that school facilities are safe and healthy for occupants, not to mention conducive to learning.

The State Auditor found “significant maintenance deficiencies at many schools” not identified in FIT reporting (CSA, 32). The result: “many schools are not meeting State standards for cleanliness and maintenance, exposing children to unsafe and unhealthful conditions that can affect their academic success” (CSA, iii). Apart from the specific wording of the recommendations in the State Auditor’s report, its bottom-line conclusion—that the FIT, as formulated and used by school districts and county offices of education, is frequently failing to deliver adequate facilities accountability—demands serious reflection.

At the June 25 stakeholder meeting and in the related Agenda Item, the FIT was characterized as “optional” (OPSC, 851, 853). Strictly speaking, this is correct because local equivalents may be used. However, under Education Code § 17002, the FIT is the de facto standard for “good repair.” As the FIT itself states, local equivalents “must minimally include the criteria and rating scheme contained in the FIT.” Further, FIT scores are widely used as an input for SARCs, which, as the State Auditor noted, “provide information on school conditions to the public” (CSA, iii). A FIT that increases the odds that this information is complete, accurate, and consistent is thus critical.

We are happy to answer any questions about or engage further on any points raised in this or our prior letter. Please contact junelle@cleanairallies.org.

Thank you for your openness to and consideration of our feedback.

Very truly yours,

JuNelle Harris
Co-Founder
Clean Air Allies