

ALTERATION AND RECONSTRUCTION PROJECTS—DSA APPROVAL EXEMPTION

Disciplines: Structural Fire & Life Safety Access Compliance	History:	Revised 01/07/19	Revised 02/04/15	Revised 11/03/10
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Division of the State Architect (DSA) documents referenced within this publication are available on the [DSA Forms](#) webpage.

PURPOSE: The purpose of this Interpretation of Regulations (IR) is to clarify when plans and specifications for alteration or reconstruction projects governed by California Education Code Sections 17295 and 81133 are required to be submitted to DSA for review and approval, and to make the annual adjustment to the construction cost thresholds cited in the California Education Code sections.

1. EXCEPTIONS:

- 1.1 DSA review and approval is not required for alteration or reconstruction projects to school buildings governed by the Field Act with an estimated construction cost of \$106,412, or less, for 2018 and 2019.
- 1.2 DSA review and approval is not required for alteration or reconstruction projects to school buildings governed by the Field Act with an estimated construction cost greater than \$106,412, but not in excess of \$239,427, for 2018 and 2019 when all of the following conditions are met:
 - 1.2.1 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 elements nor trigger structural rehabilitation per Title 24, Part 1, Section 4-309(c). This statement shall bear the signature and stamp or seal of the structural engineer and shall be filed with the appropriate DSA regional office.
 - 1.2.2 The design professional in responsible charge of the project shall prepare a statement certifying that the plans and specifications (1) contain no work that is regulated by the accessibility standards of Title 24, (2) contain no work that triggers accessibility upgrades to existing buildings or facilities, and (3) meet all applicable fire and life safety standards. This statement shall bear the signature and stamp or seal of the design professional and shall be filed with the appropriate DSA regional office.
 - 1.2.3 Within 10 days of the project completion, a DSA-certified project inspector shall sign and submit a verified report (*DSA 999: Inspection Verified Report for Projects Exempt from DSA Approval*) to DSA indicating that the completed project is in conformance with the plans and specifications.

2. VOLUNTARY SUBMITTAL: This interpretation does not preclude a design professional or school district from choosing to submit plans and specifications with the appropriate fee to DSA for review, even when the project is exempted from DSA plan review requirements as outlined herein.

3. REQUIREMENT TO COMPLY: Projects not requiring DSA approval (i.e., exempt projects) shall comply with all currently effective design, construction, and inspection provisions of the California Code of Regulations, Title 24, as adopted by DSA. **When authorizing construction of exempt projects described in this interpretation, the school district assumes responsibility to ensure compliance with all code provisions.**

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4. DEFINITION: For this interpretation, “design professional in responsible charge” or “design professional” shall be the architect, structural engineer, or professional engineer (e.g., mechanical engineer for mechanical-only projects; electrical engineer for electrical-only projects), licensed to practice in California, who is responsible for the completion of the project design work.

5. ANNUAL ADJUSTMENT OF COST THRESHOLDS: Construction cost thresholds cited in this interpretation are based on 2017-2018 values of \$103,300 and \$232,425, and are adjusted annually per the California Education Code. Annual adjustments are calculated using the first January issue of *Engineering News-Record’s U.S. 20 City Construction Cost Index*.

6. PROJECT COST DETERMINATION: For purposes of this interpretation, the estimated construction cost shall be determined at the completion of project design. For the purpose of determining estimated project cost, the scope of the project shall be limited to construction on one site only.

In accordance with Education Code Section 17280, the estimated construction cost used in determining exemption from DSA review shall not include the cost of air-conditioning equipment¹ and insulation materials², and installation cost of such equipment and materials when such installation does not cause structural alterations³ to a school building (i.e., affects primary or secondary framing members). In cases where such installation causes structural alterations to a school building, the provisions of Title 24, Part 1, Section 4-309 will apply and the project may require DSA review and approval.

7. SUBDIVISION OF PROJECTS PROHIBITED: Construction projects shall not be subdivided for the purpose of obtaining exemption from DSA review and approval.

¹ For purposes of this provision, air conditioning (AC) equipment includes heating, ventilation, and air conditioning (HVAC), AC units, heating units, or ventilation units, and does not include ductwork or utility services (i.e., electrical and/or gas service) to the equipment.

² For purposes of this provision, insulation materials must be of the same type as previously installed in accordance with building standards.

³ For purposes of this provision, the exclusion of HVAC-related cost is valid only when a determination of no structural alteration is made by a California-registered structural engineer in accordance with requirements of Section 1.2.1 of this IR.

REFERENCES:

California Code of Regulations (CCR) Title 24
Part 1, California Building Standards Administrative Code
Sections 4-306, 4-308, 4-309, 4-315, 4-336, 4-406 and 5-102
California Education Code, Sections 17295 and 81133

This IR is intended for use by DSA staff and by design professionals to promote statewide consistency for review and approval of plans and specifications as well as construction oversight of projects within the jurisdiction of DSA, which includes State of California public schools (K–12), community colleges and state-owned or state-leased essential services buildings. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

This IR is subject to revision at any time. Please check DSA's website for currently effective IRs. Only IRs listed on the webpage at www.dgs.ca.gov/dsa/publications at the time of project application submittal to DSA are considered applicable.
