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Office of Statewide Hospital Planning and Development
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CODE APPLICATION NOTICE

CAN: 1-7-153(b)

Health and Safety Code §129851

SUBJECT

Non-Material Alterations (NMA)
(Changes that do not materially alter the approved work)

Effective: 06/08/2023
Revised: 09/22/2025

CODE SECTIONS

2025 California Administrative Code, Part 1
Chapter 7 SAFETY STANDARDS FOR HEALTH FACILITIES
Section 7-111. Definitions.
Section 7-153. Changes to the approved work.

Appendix – 2025 California Building Standards Code, Title 24, California Code of Regulations, code citation(s) related to this Code Application Notice (CAN).

Acronyms and Definitions assist the user in recognizing and identifying various acronyms and terms generally used in this CAN. Please refer to the "Master Glossary of Acronyms and Definitions – Acronyms and Definitions Used in OSHPD Published Documents" which is posted on the HCAI website at https://hcai.ca.gov/document/master-glossary-of-acronyms-and-definitions/. Other definitions may also be found in the California Building Standards Code, Title 24, California Code of Regulations.

PURPOSE

The purpose of this Code Application Notice (CAN) is to clarify materially altering changes and non-materially altering changes to the approved construction documents and to explain the process for Non-Material Alteration (NMA).

BACKGROUND

The California Administrative Code (CAC) and the California Building Code (CBC), California Building Standards Code, Title 24 of the California Code of Regulations state that all construction work must be executed in conformance with the construction documents approved by the Department of Health Care Access and Information, Office of Statewide Hospital Planning and Development (HCAI/OSHPD). Furthermore, the use of the term 'the Office' refers to HCAI/OSHPD. The CAC requires changes that materially alter the work must be made by Amended Construction Documents (ACD) approved by the Office.

Materially alter is defined in the CAC Section 7-111 as any change, alteration, or modification, as determined by the Office, which does any of the following:

- Alters the scope of a project.
- Could cause the project to be in noncompliance with the California Building Standards Code, Title 24 of the California Code of Regulations.
- Causes an unreasonable risk to the health and safety of patients, staff, or the public.

CAC Section 7-153 requires any changes made to the approved construction documents during construction be submitted to the Office for approval as either a NMA or an ACD prior to the installation of the work. The Office has determined that items that do not affect code requirements may be considered a NMA and do not require an ACD to be submitted.

This CAN will help clarify that distinction and provide direction on both material and non-material changes.

The Office has adopted both the CAC and CBC requirements regarding changes to approved construction documents. The following interpretation shall apply to changes resulting in Non-Material Alterations or Amended Construction Documents.

INTERPRETATION

Non-Material Alterations (NMA) are changes that do not materially alter the approved work. Any clarifications or interpretations that are made that do not change the design may be considered equivalent to an RFI, ASI, etc. and do not require an NMA or ACD. An example of this would be clarifying a missing dimension or detail bubble that does not result in a change to the drawings other than annotation.

Amended Construction Documents (ACD) are contractual documents between owners, designers, and builders that materially alter the work.

Therefore, the Office will only review changes made after written plan approval and during construction that materially alter the work. Changes of this nature shall be submitted for approval as an ACD. Appendix B provides general guidelines and examples of Non-Material Alterations and Material Alterations by specific practice areas, i.e., Civil, Architectural, Fire and Life Safety, Structural, Mechanical, and Electrical.

Stamping and Signing by the architect or engineer: Stamping and Signing the NMA documents and/or form by the architect and engineer making the revision is required. Additionally, when the Design Professional of Record (DPOR) has determined the proposed change does not materially alter the approved work, a NMA Change Form is required to be issued by the DPOR prior to work being performed. Stamping and Signing the NMA documents by the architect or engineer represents they are accepting responsibility that the NMA will not cause the project to be in non-compliance with the California Building Standards Code or cause an unreasonable risk to the health and safety of patients, staff, or the public.

NMAs are non-material changes to approved construction documents, therefore if an NMA is submitted on a full-sized sheet (e.g. 30”x42”), the sheet will have the OSHPD Approval stamp removed, and the specific changes will be made and identified by clouds and deltas with the delta identifier, NMA number, and the date of issuance placed in the revision block of the drawing . The originally approved sheet must remain in the approved set of documents and it is allowed to have clouds and deltas to provide reference that change(s) were made as a part of a NMA(s) so the project participants will know to review the NMA sheet(s) for the NMA change(s). The NMA sheet cannot replace the approved sheet.

If new details or drawings are provided in an NMA that result in a new sheet being added to the documents, the NMA is to be issued to Field Staff for concurrence. Once concurrence is obtained then an ACD is required to be submitted to the Field Staff to incorporate the new sheet(s) into the project documents. The ACD “Reason for Change” description must identify that this is a concurred NMA and it is required at that time of submission to include the concurred NMA Change Form so that the Office does not perform a plan review of the ACD.

The NMA Change Form (HCAI-OSH-103) and the Change Log, (both available on the HCAI website) along with any issued narratives or other associated documents such as Request for Information, Architect Supplemental Instruction, Supplemental Instruction, Construction Change Directive, etc., shall be maintained on the project site as part of the inspector’s field records. See CAC Section 7-145, item 6.

All changes in the work are subject to the concurrence of HCAI/OSHPD field staff as to whether the change materially alters the work. The architect or engineer in responsible charge shall maintain a project Change Log in which all changes in the work are clearly recorded and identified as either materially altering the work or non-materially altering the work.

HCAI/OSHPD field staff concurrence shall be determined by the review of the required NMA Change Form submitted with each request. The NMA Change Form shall have details such as references to narratives and/or drawings or sketches that offer enough definition to the Office field staff that their concurrence may be obtained within the time limitation which is generally no longer than a five-minute evaluation as further explained below. The Change Log shall be maintained by the DPOR and accompany the NMA Change Form for the observation of the NMA request(s) assigned to the project.

> **Note:** Concurrence will only be noted on the NMA Change Form. The Change Log is for tracking ONLY and shows basic information on NMA changes assigned to the project.

Rejection or non-concurrence of a NMA requires the proposed revision to be submitted to the Office for review as an ACD. The Office does not perform a plan review or code analysis of NMA documents, and concurrence is determined by the Office field staff based on the information provided by the DPOR.

When **submitting documents** for NMA concurrence to the Office, include the following on the required NMA Change Form:

- HCAI/OSHPD Project Name, Number and unique sequential NMA Identification Number.
- Facility Name as it appears on the Facility License.
- All drawings shall have a stamp and signature from the architect or engineer in ~~overall~~

responsible charge of the proposed non material alteration ~~change~~, the signature of Design Professional of Record (DPOR) of the project (CAC Section 7- 153(a)(b) and CAC Section 7-115).

- Adequate description of the proposed NMA.
- All referenced documents shall be listed on the NMA Change Form and made available, as required, to make a determination, i.e., additional structural support, updated air balance, electrical calculations, etc.
- Identify what section of the CAC Section 7-153(b) it meets, the six (6) items listed under CAC Section 7-153(b) are examples of changes that would qualify as NMAs. This list is not limited to these items.

  Note: The NMA Change Form shall have no more than one change and shall identify what section of the CAC Section 7-153(b) it meets, e.g., moving a cabinet may include power outlet, light fixture, etc. All associated components of the individual proposed change can be included in a single NMA submittal.

The **time limitation** for NMA concurrence will generally be no longer than a five-minute evaluation for each NMA. Each NMA evaluation shall be an accepted or denied decision by the Office field staff that does not involve iterations of back-and-forth interaction between the field staff and the DPOR. If it is debated, it is an ACD.

NMAs must be issued to HCAI field staff for the NMA to be actionable by the contractor and IORs. The contractor is not allowed to perform work that is an NMA prior to the NMA being issued to HCAI. Title 24 California Building Standards Code does not permit a contractor to proceed with work that has not been approved. The contractor is not allowed to proceed “at risk” with any work that has not been approved by the Office or prior to the issuance of an NMA.

HCAI does not accept NMA’s that are issued “after the fact” e.g. “after the work is performed” as this work is non-compliant work that the contractor is unable to correct without a change document. This work, if discovered, will be required to be an ACD. The IORs are required per CAC Section 7-145 to issue deviation notices for work installed that is not in accordance with the approved construction documents.

An NMA should be concurred with within four (4) weeks of issue date. The issuer shall reach out to the reviewer at two (2) and three (3) weeks with a reminder. If no concurrence is received after four (4) weeks, the NMA is considered “concurred.” The issuer shall include the RCO at the 3 week reminder to reviewer. In the event the NMA is not concurred within the four (4) weeks of the issue date the issuer shall send a notice to the reviewer that the NMA is “considered concurred”. If an NMA is “considered concurred”, this does not relive the architect or engineer in responsible charge of their responsibility to ensure that all work that is performed meets the requirements of Title 24 California Building Standards Code.

An NMA may be submitted from many documents including, but not limited to: Request for Information, Architectural Supplemental Instruction, Supplemental Instruction, Construction Change Document, etc. It is acceptable to include these types of documents in the Change Log for project specific tracking, but they are not considered NMAs unless they result in a design change that requires them to be converted and submitted as an NMA or ACD. The NMA document(s) shall be

submitted with the NMA Change Form and annotated with an NMA Number in the Change Log. The Contractor is not permitted to build from Request for Information(s), Architectural Supplemental Instruction(s), Supplemental Instruction(s), Construction Change Document(s), etc. as these are NOT approved documents and the IOR does NOT inspect to such documents either.

> **Note:** Any work performed based on a non-material alteration and later determined to a material alteration, will be subject to the Office's review and possible destructive investigation.

As per CAC 7-153(b), item 2, NMAs may be referenced standards or preapproved details. This does not include OSHPD Preapproval of Manufacturers (OPMs). This item does not preclude NMAs to be based on approved details within the same project, but they must be very similar on design depicting only minor changes or additions.

During the Office field staff concurrence of NMA documents, if the Office representative determines that the DPOR has repeatedly not followed the directions noted in this CAN or submitted a NMA for opinion or information in advance of an ACD, the field staff shall issue notification to the Regional Compliance Officer (RCO) detailing the Non-Concurrence of NMA.

Appendix B contains examples of Non-Material Alterations (NMA) in one section and changes that Materially Alter the work and require an Amended Construction Document (ACD) in a separate section.

Appendix C is an example of the required Non-Material Alteration (NMA) Change Form (HCAI-OSH-103) is a fillable form which is available for download on the HCAI website. This form shall be submitted to HCAI/OSHPD by the Design Professional of Record (DPOR). The NMA Change Form shall be maintained on the project site as part of the inspector's field records.

Appendix D is an example of what is required on a Change Log and is available for download on the HCAI website. Alternatively, the Design Professional of Record (DPOR) can create their own change log. The most current Change Log shall be submitted with the NMA Change Form.

Appendix E is a flowchart depicting the determination process for a proposed change.

Original signed	09/22/2025
Chris Tokas, Deputy Director	Date

APPENDIX A

2025 California Building Standards Code, Title 24, California Code of Regulations

2025 California Administrative Code, Part 1
Chapter 7 SAFETY STANDARDS FOR HEALTH FACILITIES
Section 7-111. Definitions.

…

MATERIALLY ALTER as applied to construction projects or approved construction documents means any change, alteration, or modification, as determined by the Office, that alters the scope of a project, could cause the project to be in noncompliance with the *California Building Standards Code*, or causes an unreasonable risk to the health and safety of patients, staff, or the public.

…

7-153. Changes to the approved work.

(a) **Changes in the work.** Work shall be executed in substantial conformance with the construction documents approved by the Office. Changes in the work shall be made by amended construction documents approved by the Office. Changes in the work include, but are not limited to, the following: Correction of errors in design and/or construction to bring the construction documents and/or construction into compliance with applicable codes; change(s) in the scope of the work; and additional work required because of discovered conditions. Only changes that materially alter the work shall be submitted to the Office for review and approval as amended construction documents.

…

(b) **Changes that do not materially alter the work.** The following types of changes in the work do not materially alter the work and do not require the submission of an amended construction document to the Office:

1. Substitution of equipment, products, or materials. The equipment, product or material substituted must be code compliant; perform the same function as the equipment, product, or material that it is replacing; must not increase the mechanical or electrical loads to the building systems; must not increase loads to lateral or gravity load-bearing structural frame members; and must meet the design requirements for the project.

Note: Changing from one kind of equipment, product or material to another, such as changing from drilled-in concrete anchors to concrete screw anchors or changing the top-of-wall fire-resistive material/design are not considered substitutions and require the submittal of an amended construction document to the Office for review. If calculations by a structural engineer are necessary to determine structural or nonstructural adequacy, an amended construction document must be submitted to the Office for review.

2. New details that are referenced standards or preapproved details or based on other approved reference standards or preapproved details. Reference to the already approved details must be shown.

3. Final routing configurations of ducts, conduits, pipes, etc., where these are shown diagrammatically on the approved plans.

Note: Submittal of an amended construction document will be required when additional fire/smoke dampers, non-pre-approved seismic fittings, or specially engineered braces or hangers are necessary to accommodate the final configuration or routing.

4. Dimensional changes to rooms that do not affect code required minimum dimensions, fixed dimensions, minimum room or space requirements and required clearances.

Note: Applicable code sections and minimum dimension and space requirements must be shown on plans for confirmation by Office field staff.

5. Relocation of doors, windows, electrical switches and outlets, plumbing fixtures, etc., that do not require additional changes to the work to make the relocation code compliant.

6. Relocation or reconfiguration of cabinetry that does not affect code required minimum dimensions and clearances, minimum room or space requirements, or minimum storage requirements. Such cabinetry reconfiguration shall not increase loads to supporting members, such as wall studs and ceiling framing.

Note: Applicable code sections and minimum dimensions and space requirements must be shown on plans for confirmation by Office field staff.

If the architect or engineer in responsible charge of a project determines that changes to the approved construction documents are necessary that do not materially alter the work, all such changes shall be stamped and signed by the appropriate design professional(s) pursuant to Section 7-115. All changes in the work are subject to concurrence of the Office field staff as to whether or not the change materially alters the work.

(c) **Code compliance.** Changes in the work that do not require amended construction documents shall not be deemed to grant authorization for any work to be done in violation of the provisions of any applicable code.

…

(e) **Documentation of changes**. The architect or engineer in responsible charge shall maintain a log of all changes to the work of construction. The log shall indicate whether the Office has made a determination as to whether each change materially alters the work, the date such determination was made, and the name of the Office staff who made the determination. The log shall be maintained on the project site as part of the inspector’s field records.

APPENDIX B

Examples of Non-Material Alterations and Material Alterations

The examples in Appendix A are provided for general guidance and are subject to the requirements of CAN 1-7-153(b) Non-Material Alterations (NMA).

Non-Material Alterations **do not** require HCAI/OSHPD plan review but are subject to the concurrence of HCAI/OSHPD field staff.

Material Alterations **do** require an Amended Construction Document (ACD) to be submitted to HCAI/OSHPD for plan review and approval prior to the installation of the work.

CIVIL

Non-Material Alterations (Field review of NMA document(s) required)

- Modifications to inverts that do not reduce slope of drain to below minimum requirements or cause proximity conflicts.
- Addition of site drains that do not cause overloading of existing piping.
- Addition of curbs, sidewalks or planters that have no effect on accessibility, fire department access, means of egress or other building requirements.
- Addition of fences not more than 7 feet in height, measured on both sides and not connected to a health facility. Compliance Officer confirmation required to ensure exiting is not affected. Reference: California Building Code Section 105.2, item 2.
- Retaining walls not supporting additional surcharge and not more than 4'-0" in height measured from the footing bottom to the top of wall. Distance from HCAI/OSHPD building footing to retaining wall footing is required to be more than 15’-0”.
- Site work that may affect utility shut off or access compliance to the public way is recommended to be observed by the HCAI/OSHPD Compliance Officer. A 30-day minimum notification to the Compliance Officer is required prior to any utility shutoff. (Permit may be required). See: HCAI/OSHPD CAN 2-0 OSHPD Jurisdiction.
- New details that are based on original approved details that can be observed within the time limitation in this CAN 1-7-153(b) and that do not need to be plan reviewed for code compliance qualify as a Non- Material Alteration. NMAs based on approved details within the same project must be very similar in design depicting only minor changes or additions.
- New details that are referenced standards or preapproved details or based on other approved referenced standards or preapproved details. Reference to the already approved details must be shown.

Material Alterations (Requires submission of an ACD)

- Modifications to site grading, curbs or parking surfaces/stripping changes adversely affecting site accessibility, fire department access or means of egress to the public way.
- Modifications to the underground fire mains.
- Modifications that create clearance issues to existing utilities, such as water, sewer, electrical, etc.

- Modification to trenching in the immediate vicinity of structural footings. These modifications may require a local building permit. The distance from HCAI/OSHPD building footing to the trench is required to be more than 15'-0". Less than 15'-0" may require structural review.
- New details that require a review for code compliance or that exceeds the time limitation in this CAN 1-7-153(b), even when based in whole or part of existing details, shall be submitted as an ACD.
- Retaining wall(s) with one or more of the following:
  - More than 4'-0" in height measured from the footing bottom to the top of wall.
  - Supporting additional earth, equipment, or structure loads or impounding flammable liquids.
  - HCAI/OSHPD building footing to retaining wall footing is less than 15'-0".

  Note: May require local building permit. See CAN 2-0 OSHPD Jurisdiction.

ARCHITECTURAL

Non-Material Alterations (Field review of NMA document(s) required)

- Lowering ceiling heights to 8' minimum (7' for soffit) with no effect to other systems such as fire sprinkler or fire alarm devices, nurse call zone lights and exit signs, etc. with no effect to room air balance. See California Mechanical Code Table 4A.
- Dimensional changes to rooms, other than Incidental Use Areas, that do not affect code required minimum dimensions, fixed dimensions, minimum room or space requirements and required clearances.

  Note: Applicable code sections and minimum dimension and space requirements must be shown on plans for confirmation by HCAI/OSHPD field staff.
- Project phasing changes shall be observed by the HCAI/OSHPD Compliance Officer and be subject to the time limitation in this CAN 1-7-153(b).

  Note: Compliance Officer may consult with office reviewers for phasing and air balance reports as needed. Changes in phasing which affect the means of egress shall require Fire and Life Safety Officer consultation.
- Moving doors, sinks or casework without affecting structure, accessibility or fire ratings. Doors, sinks or casework must be shown on original approved drawings.
- Insect screens replacement/repair. See California Building Code Section 1224.4.9.4.
- Interior signage and labels, surface applied and less than 20 pounds.
- Substitutions of equipment, products, or materials. The equipment, product, or material must be code approved/acceptable; perform the same function as the equipment, product, or material that it is replacing; must not increase the mechanical or electrical loads to the building systems; must not increase loads to lateral and gravity load-bearing structural frame members; and must meet the design requirements for the project and be shown on original approved plans.
- Diagnostic equipment - Replacement of a single component on previously approved equipment. Replacement must not change mechanical or plumbing or increase electrical loads or modify any previously approved structural anchoring.

- Additions or revisions to the Testing, Inspection and Observation Program, without altering the intent of the original approved plans, specifications or code required tests.
- Mold mitigation - Industrial hygienist report required.
- Relocating portable partitions and workstations 5’-9” or less in height and not open to, or within the corridor or exit system. Permit or ACD Required if partitions are over 5’-9” in height or open to the corridor or exit system.
- Non-Integrated door hardware replacements that are not connected to automatic controls, openers, closers, etc. not affecting accessibility requirements or ratings of fire assemblies or adversely affecting or altering ingress and egress as required by code.
- Revisions to casework that do not result in added scope or cause a non-conformance to California Building Code requirements and are using original plan approved anchorage details.
- Replacing an item that must be removed to accommodate other construction. An example of this is partially removing a ceiling to install items above it. It may be reinstalled as it was prior to removal as long as the affected item was code compliant when constructed. All ceiling wire replacement must be in compliance with ASTM E580.

  All unauthorized work must be brought into compliance with the current code. This would apply to other items such as casework, wall mounted equipment, etc. See CAN 2-102.6 Remodel, (Renovations, Alterations, Repairs).

  Note: If the approved plans do not depict the partial area to be removed, a consultation with the Design Professional of Record is required.
- Items on the Outstanding Items List may be closed as NMA if they are in compliance with the comment.
- Asbestos removal. Authorization/permits from the regulatory authority for asbestos abatement/removal, transportation and disposal shall be obtained and HCAI/OSHPD may request a copy of the permit and abatement report for HCAI/OSHPD permitted projects where asbestos abatement/removal has occurred.
- Patching of a roof to prevent leaks must not exceed three squares (300 square feet). The material used must meet the requirements and may be approved by the Compliance Officer. Reroofing over 300 square feet requires an ACD. When adding sealant or repairing sealant, contact the Compliance Officer and Fire and Life Safety Officer for concurrence with applicability. Existing roof system shall be provided along with product information qualifying its acceptable use.
- If equipment for a specific area under construction is not available at the time of construction, the equipment can be deferred to a later date. HCAI/OSHPD can issue a Substantial Compliance report without the equipment, but the equipment must be installed prior to a Construction Final report, which means everything is complete or 100% construction complete.
- New details that are based on original approved details that can be observed within the time limitation in this CAN 1-7-153(b) and that do not need to be plan reviewed for code compliance qualify as a Non- Material Alteration. NMAs based on approved details within the same project must be very similar in design depicting only minor changes or additions.

Material Alterations (Requires submission of an ACD)

- Adding access controls to doors.
- Modifications to Sections 1224, 1225, or 1228 of the California Building Code required minimum clearances affecting functionality of space.
- Changes involving a different code cycle being referenced than the original approved plans code cycle. May possibly require an Alternate Method of Compliance.
- Elimination of code required spaces. May possibly require an Alternate Method of Compliance.
- Egress changes of routing, temporary structures and equipment, temporary air handlers, temporary bulk oxygen tanks, temporary generators, or temporary shoring supporting an occupied building under HCAI/OSHPD jurisdiction are not considered means and methods and thus would require a separate permit or the submittal of an amended construction document to the Office for review. See CAN 2-102.6 Remodel (Renovations, Alterations, Repairs) and CAN 2-108 Temporary Structures and Uses.
- Diagnostic equipment replacement - Complete replacement of a piece of equipment.
- Submittal of an ACD will be required when additional non-preapproved seismic fittings, or specially engineered braces or hangers are necessary to accommodate the final configuration or routing of ducting or piping.
- Changes in routing of services/systems or utilities that may violate California Building Code Section 1224.4.
- Any change that violates the requirement in the California Administrative Code Section 7-125.
- Any modifications, upgrades not addressed in the original approved plans or adversely affecting accessibility requirements in California Building Code, Chapter 11B. See CAN 2-11B Accessibility in Health Facilities.
- Changes involving a Change of Occupancy, Change of Function, Alternate Method of Compliance (AMC), Critical Path Expedited Review (CPER) or Deferred Submittal item (DSI) See CAN 2-102.6 Remodel, (Renovations, Alterations, Repairs).
- Relocating or replacing an existing wall.
- Auto Guided Vehicle Systems (AGVS).

  Note: HCAI/OSHPD review and permitting required. See PIN 69 Automated Guided Vehicle Systems (AGVS).
- Exterior exit signage, new exit signs (illuminated) and emergency lighting. If sign is in a remote location i.e., vicinity of the back of sidewalks, local authorities may also have jurisdiction.
- Food establishment facility work (See the California Retail Food Code in Health and Safety Code Section 113700 et seq.). Local health agency review required prior to Office review of plans and permitting.
- Weather protection procedures for protection of gypsum boards shall be per CAN 2-2508.2.1 Weather Protection for Gypsum Wallboard. requirements. Submit to HCAI/OSHPD field staff for review is required. May possibly require an AMC.

- New details that require a review for code compliance or that exceeds the time limitation in this CAN 1-7-153(b), even when based in whole or part of existing details.

FIRE AND LIFE SAFETY

Non-Material Alterations (Field review of NMA document required)

- Minor sprinkler head relocations (maximum 10 relocations per project), additional sprinkler heads (maximum 10 per project) or minor re-routing of piping that does not affect hydraulic calculations and demand requirements. All changes must comply with NFPA 13.
- Relocation of existing fire alarm device(s) up to 5 devices.
- Relocating rated doors within walls that require opening protection. New location must be within the original wall design and must comply with travel distances and separation requirements of doors.
- Substitutions of approved listed assemblies for providing a rated separation on 1-hour or 2-hour rated partition types used for temporary construction barriers (shall comply with California Fire Code Sections 3301, 3305.9 and CAN 9-3301 Fire-resistive Assemblies and Construction as noted below).
    - In occupied buildings, where temporary construction barriers are required to be installed during the construction or reconstruction of fire-resistance-rated assemblies, temporary construction shall meet the same fire-resistance rating as would the permanent partition and comply with:
        1. Non-combustible materials.
        2. Materials that exhibit a flame spread index not exceeding 25 when tested in accordance with ASTM E84 or UL 723.
        3. Materials exhibiting a heat peak release rate not exceeding 300kW/m² when tested in accordance with ASTM E1354 at an incident heat flux of 50 kW/m² in the horizontal orientation on specimens at the thickness intended for use.
    - Use of plastic or vinyl dust barriers in lieu of fire-resistance-rated separations is prohibited.
    - Temporary construction barriers are not required where adequate fire-resistance-rated separations can be demonstrated to exist between occupied areas and construction areas.
    - Smoke compartments and refuge areas in compliance with California Building Code Section 407 shall be maintained throughout the period of construction.
    - Existing means of egress need not be maintained where approved temporary means of egress systems and facilities are provided.
    - Required means of egress shall be maintained at all times during construction, demolition, remodeling or alterations and additions to any building.
    - A horizontal exit shall not be destroyed unless and until a substitute means of egress has been provided and approved.
    - Where construction barriers affect any exit component, pre-approval shall be obtained from the local fire code official and OSHPD prior to any demolition or reconstruction.
- Substitutions of listed fire protection products, originally listed on approved plans, shop drawings or deferred approval.

- Substituting head of wall details to another applicable head of wall detail located on the original approved plan(s).

  Note: A new applicable listed assembly may be added to the approved plans(s) as an NMA.

- Replacement of up to 5 fire rated door(s). For damaged door and hardware in smoke partitions, fire barriers, and firewalls only (does not include frame, integrated hardware, and glazing).

  Note: Only non-integrated hardware allowed (Not connected to automated controls, openers, closers, etc.) Fire and Life Safety Officer to visit facility to confirm rating.

- Maintenance of minor holes and damage of existing fire stop system protection of rated walls, partitions, ceilings, and floors.

  Note: See standard detail FR3.06 for rated wall penetration blowout patch in OPD-0091-13 2013 CBC Fire-Resistive Standard Details.

- New details that are based on original approved details that can be observed within the time limitation in this CAN 1-7-153(b) and that do not need to be plan reviewed for code compliance qualify as a Non- Material Alteration. NMAs based on approved details within the same project must be very similar in design depicting only minor changes or additions.

Material Alterations (Requires submission of an ACD)

- Deletions and/or additions of fire/smoke dampers, fire dampers or smoke dampers.
- Reclassifications of types or fire ratings of walls or assemblies. Reclassification of walls or assemblies that require opening protection.
- Modifications to any fire resistive rated assembly, fire resistant joint system or penetration assembly, fire rated component that alters the original intent of the listing or is not replaced with another listed assembly.
- Installation of new fire alarm devices.
- Repairs or replacements to fuel, med Gas storage and equipment and components require submission of an ACD.
- Additions to sprinkler systems that changes the hydraulic calculations.
- Substitution of equivalent listed fire-resistant rated protection products that alter support or bracing or performance characteristics or requirements.
- Exceeding minimum or maximum storage requirements of an area or room.
- Engineering Judgment (EJ). See CAN 2-703.3 Engineering Judgments.
- Low voltage cabling penetrations through fire resistive construction requires approved fire penetration protection and HCAI/OSHPD review and permitting.
- Replacement of fire rated doors and frames, including integrated hardware and glazing, and including connections to fire alarm, and/or power - HCAI/OSHPD Review and Permit required.
- New details that require a review for code compliance or that exceeds the time limitation in this CAN 1-7-153(b), even when based in whole or part of existing details.

STRUCTURAL

Non-Material Alterations (Field review of NMA document(s) required)

- Relocate or add new core where concrete coring is already shown on approved documents. Structural Engineer of Record shall confirm if reinforcement being cut is not significant such as chords, collectors, and boundary elements.

  Note: New cores must be listed on structural documents to be considered an NMA.

- When a Special Seismic Certification Preapproved detail (OSP) for a piece of equipment already shown on the approved drawings has manufacturer updates, revise the OSP number.
- Modifications to slab edge distances that do not exceed those shown on the structural engineer's cantilever condition approval.
- Substitution of equipment such that the seismic demands on the structure are not increased. Substantiating calculations should not be required.
- Adding, relocating, or deleting equipment that does not require seismic calculations. See PIN 68 Support and Attachment Requirements for Fixed, Interim, Mobile, Movable, Other and Temporary Equipment and CAN 2-108 Temporary Structures and Uses.
- New details that are based on original approved details that can be observed within the time limitation in this CAN 1-7-153(b) and that do not need to be plan reviewed for code compliance qualify as a Non- Material Alteration. NMAs based on approved details within the same project must be very similar in design depicting only minor changes or additions.

Material Alterations (Requires submission of an ACD)

- New concrete cores where no coring is shown on approved documents.
- Additions, deletions and/or substitutions of structural members.
- Span increases for gravity members and/or any span changes for lateral force resisting elements.
- Altering of structural connections.
- Modifications to the seismic force (load) resisting system, the primary gravity load carrying members, and their load paths.

  Reduction of stud sizes or gauge, changes to headers or their connections.

- Modifications to original pre-approvals, proprietary or manufactured items. See PIN 51 Use of HCAI Pre-Approved Details.
- Layout drawings of support attachments and bracing systems. See PIN 62 OSHPD Preapproval of Manufacturer's Certification (OPM).
- Modifications involving the installation of fixed equipment weighing more than 400 pounds supported on the roof or floor or weighing more than 20 pounds hung from the wall or roof/floor/ceiling. See CAN 2-102.6 Remodel, (Renovations, Alterations, Repairs). Exceptions for existing equipment replacements.
- Supports, shoring, or scaffolding which support or attach to HCAI buildings are not considered construction means and methods.

- Any change where calculations by the structural engineer in responsible charge or by the delegated structural engineer are necessary to determine structural or nonstructural adequacy.
- New details that require a review for code compliance or that exceeds the time limitation in this CAN 1-7-153(b), even when based in whole or part of existing details.

MECHANICAL

Non-Material Alterations (Field review of NMA document(s) required)

- Dimensional clarifications.
- Replacement in kind of damaged registers, grilles, and diffusers when items remain in the same location provided that the code does not contain specific location or balancing requirements.
- Relocating registers, grilles, or diffusers within the same originally approved room, provided that the code does not contain specific air device location requirements (for example Airborne Infection Isolation Rooms, Operating Rooms, etc.). DPOR to ensure there will not be any impact to air balance requirements.
- Changes to duct sizes or shapes (square, round or oval) without changing aggregate size of duct, airflow, tap locations, air balance requirements or affecting other material locations, of fire or smoke damper installation requirements.
- Minor rerouting of hydronic piping or ducting that does not impact other construction requirements such as fire smoke dampers or required seismic restraint.
- Minor changes to air flow values where the minimum code required airflows are provided. (DPOR must confirm California Mechanical Code Table 4A requirements are met). If the time to review the air balance exceeds five minutes, alternate arrangements for review will need to be scheduled.

  Note: HCAI/OSHPD field staff may consult with office reviewers for phasing and air balance reports as needed.
- Addition of manual volume dampers where needed for balancing of existing ductwork.
- Relocation of plumbing fixtures above building slab or on grade where the hot water branch does not exceed 25’ total length in accordance with California Plumbing Code Section 613.6.
- Minor revisions to med gas outlet locations shown on project’s approved plans.
- Countertop kitchen cooking appliances and equipment, such as, toasters, mixers, meat slicers, coffee makers.

  Note: Large floor mounted equipment, such as, kettles, requires anchorage and will require ACD submittal.
- New details that are based on original approved details that can be observed within the time limitation in this CAN 1-7-153(b) and that do not need to be plan reviewed for code compliance qualify as a Non- Material Alteration. NMAs based on approved details within the same project must be very similar in design depicting only minor changes or additions.

Material Alterations (Requires submission of an ACD)

- Altering room air balance to a non-compliant condition.
- Relocating diffusers or registers in a room that requires specific air device location requirements (for example Airborne Infection Isolation Rooms, Operating Rooms, etc.).
- Revision of air flow values that changes the air pressure relationship of the space.
- Addition or replacement of large capacity fan. See CAN 2-102.6 Remodel, (Renovations, Alterations, Repairs).
- Demolition and removal of plumbing fixtures with a hot water line.
- Additions, alterations, relocation of med gas zone valves, medical gas piping, medical vacuum systems or Medical Air systems.
- Complete replacement of defective traps, drainpipe, soiled waste, or vent pipe damages below slab on grade discovered during maintenance work shall be considered new work and as such will require HCAI/OSHPD review and permitting.
- Addition or alteration of Fuel Storage Tanks.
- All utility connections to water, gas, electric and sewer between the facility require HCAI/OSHPD permit or ACD Review.

  Note: Evidence of approval from local authority having jurisdiction required. See CAN 2-0 OSHPD Jurisdiction.
- Duct size changes that are smaller than the design cross section.
- Additions of new hydronic components such as valves, electronic controls, and changes to original design or Building Management System (BMS) sequence of operations.
- New details that require a review for code compliance or that exceeds the time limitation in this CAN 1-7-153(b), even when based in whole or part of existing details.

ELECTRICAL

Non-Material Alterations (Field review of NMA document(s) required)

- Added notes or details that do not change the ratings of the electrical equipment on the approved drawings.
- Relocating general purpose receptacles within the same room, without causing non-conformance with the California Electrical Code Sections 517.18, 517.19, and 210.8(B).
- Replacing used worn out receptacles (Listed Hospital Grade receptacles at patient care areas).

  Note: Compliance Officer to verify receptacle type including circuit identification Essential Electrical Systems vs normal power circuit. Fire and Life Safety Officer review required to determine placement related to fire rated assemblies.
- Deleting non-code required general purpose receptacles. Load reduction should be identified on related panel schedules.
- Relocating general-use switches, without causing non-conformance with the California Electrical Code and/or California Energy Code Section 130.1.

- Relocating or deleting normal powered light fixtures except where required by California Electrical Code Section 700.17.
- Re-lamping existing troffer luminaire with UL TYPE A LED Tubes while fixture body remains as original condition One for one tube replacement. Internal luminaire wiring remains unchanged. Fixture body is to remain as original condition due to if changed it could trigger support requirement changes.

  Note: See Material Alteration section below for Type B and C luminaire.
- Relocating the location of new panelboard or switchgear within the same room as long as working and dedicated space per California Electrical Code Article 110 and other clearances are maintained.
- Increase conduit size without change in conductor size.
- Increase conductor sizes as long as conduit fill is not exceeded California Electrical Code Section 300.17 and the feeder or branch circuit overcurrent protection device remains unchanged.
- Adding, relocating, increasing the size of pull, junction, or splice boxes for conductors #6 AWG or less in size
- Changes in circuit numbers of branch circuits in same panelboard as long as they are connected to the same phases and no load is added. Panel directory and outlet circuit identification when required must be updated in accordance with California Electrical Code Section 210.5(C)(1).
- Replacement of single component of equipment such as permanently damaged motors/compressors with other of the same horsepower/voltage, etc.
- Reduction of loads for branch circuiting for other than motor loads.
- Reduction of single motors where resultant full load amps (FLA) is:
  - 6A or less and overcurrent protective device (OCPD) is 15A.
  - Between 6A and 8A and (OCPD) is 20A.
  - Between 8A and 12A and (OCPD) is 30A.

  Note: Panel directory to be updated in accordance with California Electrical Code Section 210.5(C)(1).
- Providing overcurrent protection device (circuit breakers and/or fuses) with the ampere interrupting capacity (AIC) exceeding the AIC shown in the approved construction documents and equal to or larger than the equipment short-circuit current rating (SCCR).
  - Non-Essential power only
  - Not upstream of automatic transfer switch(s)
  - Replacement in kind only

- Contractor use of temporary generator for purpose of contractor tool and equipment use only (i.e., lights, space heater) in unoccupied spaces only and not connected to facility power in any manner. Setback and clearance requirements per CAN 2-108 Temporary Structures and Uses, shall apply.
- New details that are based on original approved details that can be observed within the time limitation in this CAN 1-7-153(b) and that do not need to be plan reviewed for code compliance qualify as a Non- Material Alteration. NMAs based on approved details within the same project must be very similar in design depicting only minor changes or additions.
- Lighting system retrofit:
  - Re-lamping existing fluorescent troffer with UL TYPE B LED tubes.
  - Re-lamping existing fluorescent troffer with UL TYPE C LED tubes.

Material Alterations (Requires submission of an ACD)

- Adding information to drawings or specifications resulting in non-compliance with California Electrical Code Article 517.
- Modifications to original pre-approvals, proprietary, listed, labeled or manufactured items.
- Permanent or temporary use of an emergency generator for facilities use requires HCAI/OSHPD review. See CAN 2-108 Temporary Structures and Uses.
- Installing new electrical panelboards, switchboards, switchgear, motor control centers, transfer switches and disconnect switches with short-circuit current rating (SCCR) lower than the SCCR shown in the approved construction documents.
- Change electrical ratings of electrical equipment.

  Note: The following four items required electrical coordination study per PIN 70 Electrical Coordination, if connected to essential electrical system.
  - Relocating electrical circuits to different electrical panels.
  - Installation of new overcurrent protection device (circuit breaker and/or fuse) on essential power circuit.
  - Changing the trip rating of an over current protection device (Breaker).
  - Changes in manufacturers and/or part numbers of circuit breakers for emergency systems, essential electrical systems and/or elevator systems shown in approved electrical coordination study.
- Decrease conduit sizes.
- Decrease conductor sizes.
- Paging systems connected to emergency electrical systems requires HCAI/OSHPD review and permitting.
- Adding wall mounted Medical Records Systems (EMR Computers).
- Temporary wireless nurse call systems. See PIN 60 Temporary Wireless Nurse Call System.
- Electrical receptacles - new additions.

- Electrical coordination studies.
- Surge protection - Adding surge protection to the project. A listed SPD shall be installed in or on all emergency systems switchboards and panelboards in accordance with California Electrical Code Section 700.8.
- New details that require a review for code compliance or that exceeds the time limitation in this CAN 1-7-153(b), even when based in whole or part of existing details.

APPENDIX C

Non-Material Alteration (NMA) Change Form

HCAi DEPARTMENT OF HEALTH CARE ACCESS AND INFORMATION
OFFICE OF STATEWIDE HOSPITAL PLANNING AND DEVELOPMENT

Non-Material Alteration (NMA) Change Form

NMA Number:	Facility ID Number:	Client Document Name:	Issue Date:

Facility Name and Address:	HCAI/OSHPD Project Name and Number:	
Subject of NMA Change:	☐ Contractor RFI ☐ Field Condition ☐ Owner Request ☐ DPOR Revision ☐ OIL Resolution	**Attached Drawings/Sketches:**

Description of NMA Change: If NMA is clearing outstanding item(s), provide details.

AOR/EOR Stamp and Signature: ***Only required if not attaching drawings/sketches.***	HCAI/OSHPD Concurrence and Date:

Design Professional of Record

By my signature below, I acknowledge that the documents for the submittal type above have been reviewed and have been found to be in conformance with CAC Section 7-153(b) and the design of the project.

Signature of Architect or Engineer in Responsible Charge	Date:

STATE OF CALIFORNIA – HEALTH AND HUMAN SERVICES AGENCY HCAI-OSH-103 (Rev 09/10/2025)

APPENDIX D

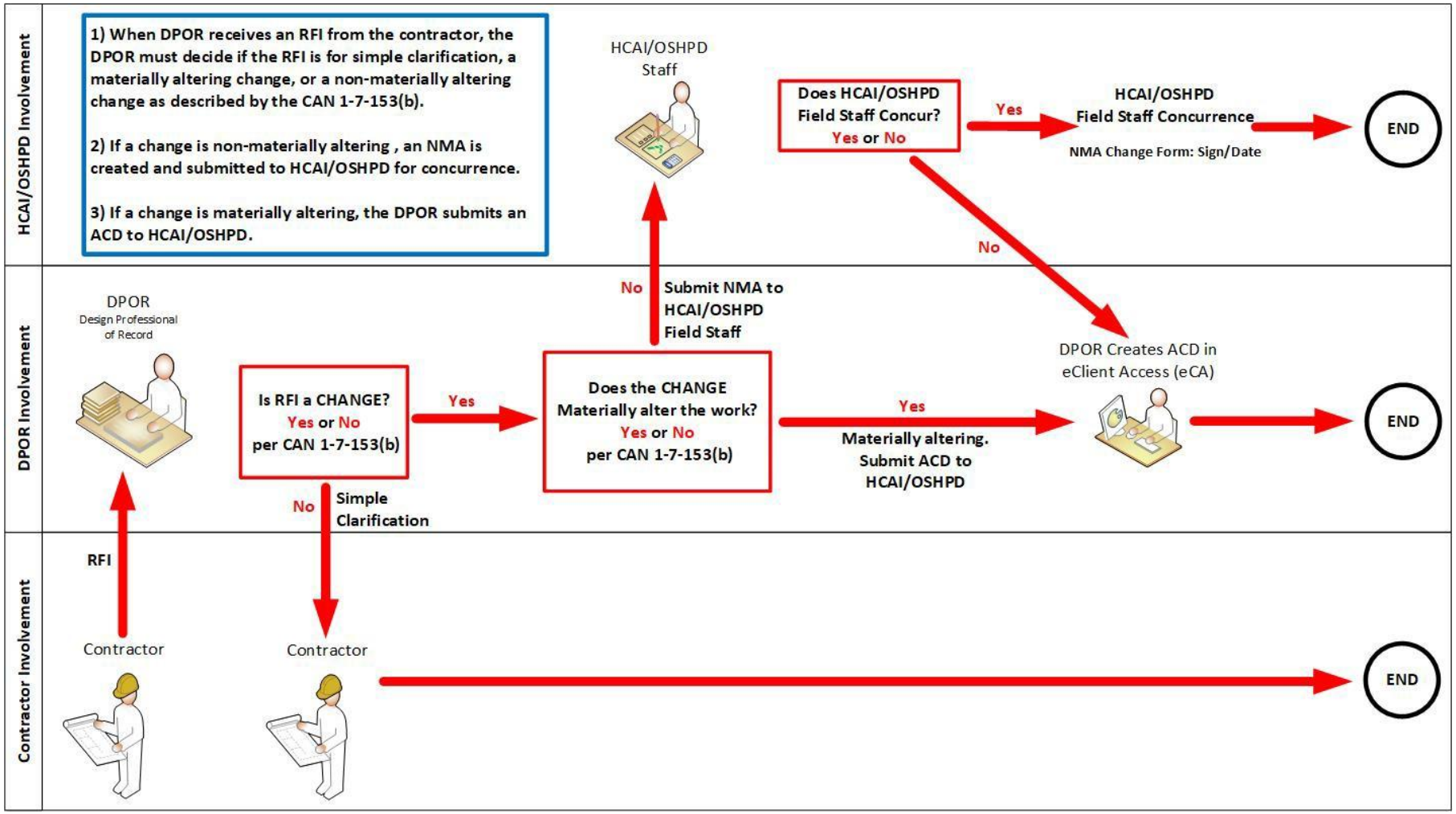
Change Log

CHANGE LOG
(Maintained by DPOR – HCAI/OSHPD to View Only)

	Facility ID Number:	HCAI/OSHPD Project Number:	Date:	
Subject of Change	Description of Change	List of Drawings Affected	HCAI/OSHPD Concurrence Initial and Date	ACD Number

APPENDIX E

Determination Process for a Proposed Change



REVISION HISTORY

09-22-2025	Clarification of signatures required for an NMA. Removed the requirement to identify one of six qualifying NMA items and clarification that these are only examples. Clarification of the use of RFI, ASI as NMAs. Under the individual disciplines, clarification is given the an NMA can be based on existing approved details if they are very similar.
05-15-2025	Update to reflect this CAN is for the 2025 edition of the California Administrative Code, not the 2022 edition. Information is added to clarity why items 1 and 2 are repealed from Section 7-153 (b). Provided clarification that existing approved details can be modified via NMA if very similar.
04-15-2025	Updated to reflect March 29, 2025 changes to the 2025 California Administrative Code, Section 7-153 (b) – elimination of items 1 and 2 and renumbering of the six remaining items.
07-15-2024	Updated to reflected 2022 Supplement changes to the California Administrative Code, Section 7-153 (b) 4. Clarification on how to handle full size sheets submitted as NMAs. Added information for NMAs not concurred within 4 weeks. Added repercussions for work performed without a concurred NMA.OPMs do not qualify as NMAs.
06-08-2023	First Issued