

# How-To-Guide for Preapproved Fabricated Components and Systems Hospital Building Safety Board

## 1) Definitions

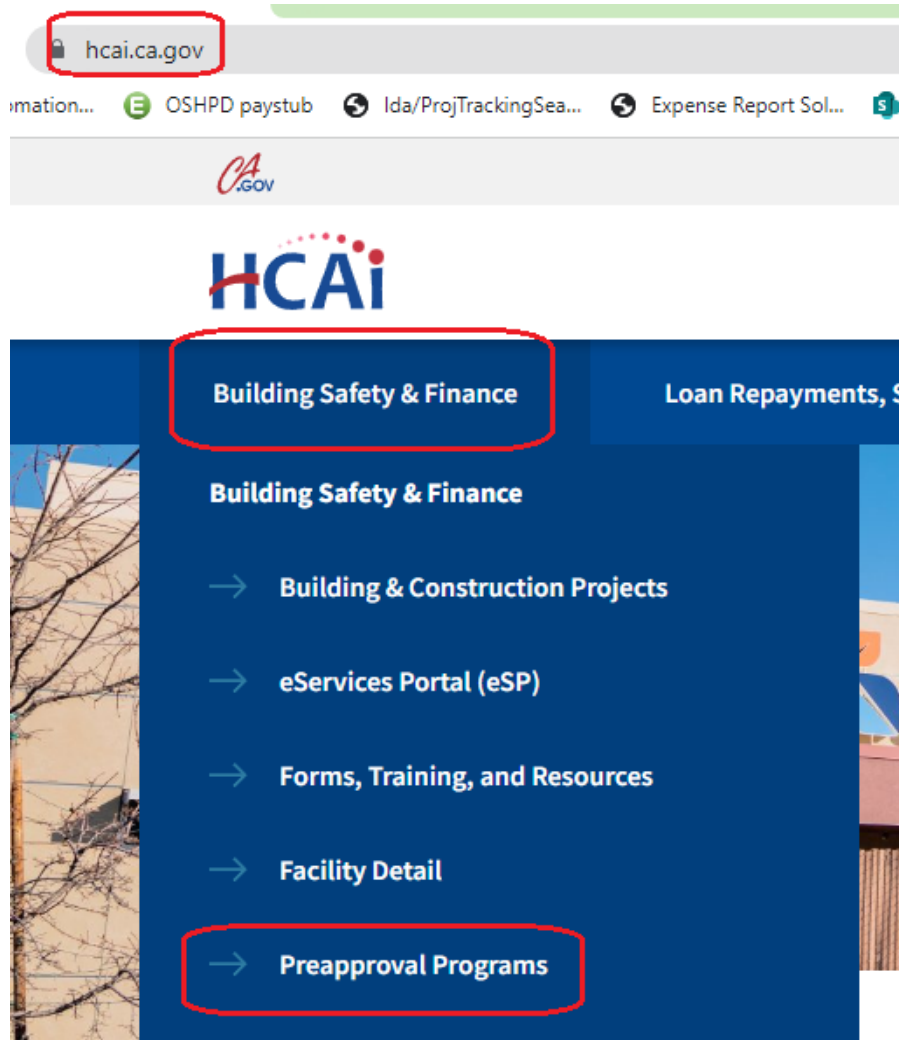
- **Components:** a constituent part, element; a part of a system. Components are defined as parts of architectural, mechanical or mechanical system (ASCE 7). This may also be an assembly of components
- **Manufacture:** the making of goods or components by manual labor or by machinery.
- **Pre-Assemble:** to manufacture sections of (a building), especially in a factory, so that they can be easily transported to and rapidly assembled on a building site.
- **Pre-Fabricate:** produce, create or manufacture a product of multiple components prior to installation.
- **On-Site Fabrication:** assembly of components on-site in preparation for immediate installation.
- **Off-Site Fabrication:** assembly of components off-site in preparation for transport to a project site with the intent to install it later.
- **Offsite Prefabrication:** component assembly or fabrication of manufactured components that are normally assembled/fabricated on a construction site at the final installed location. Offsite prefabrication of components **CAN BE** approved under the project which it is installed.
- **OPM** - OSHPD Preapproval of Manufacturer's Certification (OPM) is a voluntary program for review and preapproval of seismic design of supports and attachments for nonstructural components to be used in health facilities construction in California.
- **OSP** - OSHPD Special Seismic Certification Preapproval (OSP) is a voluntary program for review and preapproval of Special Seismic Certifications to be used in health facilities construction in California.
- **OPAA** - OSHPD Preapproved Agency (OPAA) is a voluntary program for Structural Tests and Special Inspections agencies providing services to California's Health Facilities Construction. OPAA is issued on the basis of the Agency's accreditation or DSA-LEA approval in accordance with PIN 58.
- **OPD** - OSHPD Preapproved Details (OPD) are standard architectural and engineering details developed by HCAI OSHPD for use in California health facilities construction, at the discretion of Registered Design Professionals (RDP).

- **PCS** – The OSHPD Preapproved Prefabricated Components and Systems program is created to provide a multi-discipline preapproval for prefabricated components and systems for healthcare construction projects. This will streamline the review process for components and systems as there will be multiple disciplines that are preapproved. PCS eliminates the need for manufacturers to find a healthcare construction project to get their systems reviewed, not only saving time from repetitive plan review, but also greatly reducing uncertainty of getting approval.
- Prefabricated = Preassembled.
- Distinction of Manufactured Components
  - o Manufactured Components: Components that come from a manufacturing facility or factory and available from a catalogue. For design, the manufacturer provides:
    - Capacity of the component, or
    - Maximum seismic acceleration for the component or
    - Manufacturer’s certification of seismic qualification.
    - Manufactured components are typically not assembled on site (unless they are packaged in the manufacturing facility or factory for minor assembly on site).

## 2) PCS Review and Approval Process

- Process to get a PCS: Program is created to provide **a multi-discipline preapproval** for prefabricated components and systems for healthcare construction projects. This will streamline the review process for components and systems as there will be multiple disciplines that are preapproved. PCS eliminates the need for manufacturers to find a healthcare construction project to get their systems reviewed, not only saving time from repetitive plan review, but also greatly reducing uncertainty of getting approval.
  1. Complete the Application and pay the filing fee of \$250.00. Project billing will be done hourly, with the level of complexity determining the extent of review required
  2. Submit supporting documents, test reports, drawings, product catalog, and calculations for review. Supporting document should be submitted by email or FTP site and should show;
    - The document must adhere to California Building codes and standards.
    - Include a table of contents for easy navigation.
    - Ensure that calculations are presented in a clear and easily understandable manner.
    - Include relevant testing data where applicable.

- Incorporate Testing Inspection Observation (TIO) reports.
  - Include General notes and typical notes for clarity and reference.
  - Provide common case scenarios and sizes rather than overly complex data.
  - Coordinate between disciplines before submittal.
3. HCAI performs Multi-Discipline review of materials
  4. Potential Coordination meeting between design professional and manufacturer/consultant
  5. Consultant Reviews the comments and responds to comments
  6. HCAI does PCS multi-discipline review of comment responses
  7. Final Approval by HCAI



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# OSHPD Preapproved Prefabricated Components and Systems (PCS)

The [OSHPD Preapproved Prefabricated Components and Systems \(PCS\)](#) program is created to provide a multi-discipline preapproval for prefabricated components and systems for healthcare construction projects. This will streamline the review process for components and systems as there will be multiple disciplines that are preapproved. PCS eliminates the need for manufacturers to find a healthcare construction project to get their systems reviewed, not only saving time from repetitive plan review, but also greatly reducing uncertainty of getting approval.

If you have questions regarding the PCS program please send an email to [PPCS@hcai.ca.gov](mailto:PPCS@hcai.ca.gov)

[List of PCS](#)

## Submit an Application for PCS

Submit an Application for OSHPD Preapproved Prefabricated Components and Systems (PCS) by completing a PDF Application and submitting it via email

[Application for PCS](#)

[Submit Application](#)



DEPARTMENT OF HEALTH CARE ACCESS AND INFORMATION  
FACILITIES DEVELOPMENT DIVISION

<b>APPLICATION FOR PREAPPROVED PREFABRICATED COMPONENTS AND SYSTEMS</b>	<small>OFFICE USE ONLY</small>
	APPLICATION #: PCS- _____

**HCAI Preapproved Prefabricated Components and Systems (PCS)**

Type:  New  Renewal

**Manufacturer Information**

Manufacturer: \_\_\_\_\_

Manufacturer's Technical Representative: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Email: \_\_\_\_\_

**Product Information**

Product Name: \_\_\_\_\_

Product Type: \_\_\_\_\_

General Description: \_\_\_\_\_

**Applicant Information**

Applicant Company Name: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Email: \_\_\_\_\_

I hereby agree to reimburse the Department of Health Care Access and Information review fees in accordance with the 2019 California Administrative Code.

Signature of Applicant: \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_ Company Name: \_\_\_\_\_

**Registered Design Professional Preparing Engineering Report**

Company Name: \_\_\_\_\_

Name: \_\_\_\_\_ California License Number: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Email: \_\_\_\_\_



**DEPARTMENT OF HEALTH CARE ACCESS AND INFORMATION  
FACILITIES DEVELOPMENT DIVISION**

<small>OFFICE USE ONLY</small>
APPLICATION #: PCS- <input type="text"/>

**Disciplines Involved**

- Structural     Architectural     Mechanical     Electrical     Plumbing     Fire Life Safety

<b>OFFICE USE ONLY – HCAI APPROVAL</b>	
Signature: _____	Date: <input type="text"/>
Print Name: <input type="text"/>	
Title: <input type="text"/>	
Approved Version Number <input type="text"/>	

**Version History**


- 3) Process to use a PCS Preapproval in the drawings
  - a. Simply Include the Preapproval documents in the project drawing set, HCAI reviewers will confirm application of the preapproved system but no further review or comment is required as long as no deviations have been taken from the preapproved system and details.

- 4) Project specific prefabrication does not involve the use of preapproved systems or details. Details to facilitate prefabrication can be project specific and will be reviewed and approved in sequence with the project permit application but can be subject to code and constructability comments during review.
- 5) Inspections: Process and how TIO is developed
  - a. Prefabrication/Assembly Inspections
    - i. **On-site**
      1. IOR to verify with Contractor the prefabricated components delivered to the site are in conformance with the identification system and tracking paperwork established at the prefabrication site. IOR to verify components are checked for damage due to transportation.
      2. Once prefabricated components are moved into place, they can connect to building utilities and complete all remaining TIO processes, with IOR inspection and HCAI Field Staff observation at the appropriate milestones.
    - ii. **Off-Site-** Can be adjacent to site, out of state or even out of country. Off-site fabrication of structural parts CBC 1704A.2.5 “Where fabrication of structural, loadbearing or lateral load-resisting members or assemblies is being conducted on the premises of a fabricator’s shop, special inspections of the fabricated items shall be performed during fabrication.”
      1. Inspection and observation needs to occur when preassembling. The DPOR should consult with the contractor and prior to commencement of related fabrication/construction and, shall identify all special inspections to be performed off-site. (Same inspections as would take place onsite. Don’t bury work/components that haven’t been inspected)
        - a. If pieces are just cut and bundled, inspection is done onsite per standard flow
      2. IOR to verify with Contractor the prefab-assembly matches the correct Increment and Approved Construction Documents, along with related TIO references
      3. Assign unit number on TIO (through Inspection Software) for each prefab-assembly for tracking.
      4. All trades: Coordinate with IOR to material ID all material to be used.
      5. IOR, Contractor, and responsible 3rd parties to execute TIO process for all framing, mechanical, electrical, and plumbing

elements that can be inspected independent of and prior to connection to on-site utilities

6. Contractor to cap applicable elements (such as medical gas piping) in prefab-assembly as appropriate for transportation to the construction site
  7. IOR to provide inspections during Prefabrication process.
  8. IOR and AOR to schedule HCAI Field Staff visits to the prefabrication site as appropriate to review TIO Milestone progress.
  9. IOR to complete final inspection prior to acceptance for job site delivery.
  10. Populate final tracking and related paperwork for delivery.
  11. IOR to verify with Contractor the prefabricated components delivered to the site are in conformance with the identification system and tracking paperwork established at the prefabrication site.
  12. Inspection when installing in final position
  13. Inspection if anything is changed
- b. Vendor/Manufacturer Inspections – PCS approved products can collaboratively produce a product specific TIO in conjunction with the PCS approval to further aid the process of product implementation.
- i. HCAI Representative visited SurePods to see how pods were put together to develop the TIO. Show Example TIO developed.

## 6) FLS

- Input on Pre-approvals
- Input on Prefabricated components

## 7) Example Projects – How prefabrication has been used

- UCSF Parnasus : Self Perform Bathroom Pods
- Kaiser Roseville
- Sutter Santa Clara

## 8) Vendor Feedback – What was the experience, what recommendations do they have

- SurePods
- DuraFuse
- Stark Walls

## 9) Q&A from 6/25/24 Webinar

## Inspections

How-to-Guide Development for Pre-Approved Fabricated Components and Systems

Inspection Section (Quality Assurance - make distinction here)

Define: Manufacturing (prototype approach, same workers, consistent quality pattern).  
vs pre-fabrication vs field construction (no prototype approach, workers are one offs,  
variable quality)

Note: OSHPD Pre-approval limits to minor variabilities

Note: TIO is product of the DPOR, not the IOR or COR

Manufacturing:

Other organizations provide/dictate QA

Pre-fabrication:

Break down by complexity

Break down by nature of the work

Continuous?

Periodic?

Follows basic principles of standard field Construction

Field Construction:

Inspection as usual for OSHPD projects

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## Fire & Life Safety

Fire and Life Safety Design Considerations for preapproved fabricated components and systems

Preapproved fabricated components and systems integrated within buildings must be designed and installed in a manner that maintains compliance with applicable fire and life safety requirements. While these systems are constructed off-site, their installation introduces unique coordination challenges that must be addressed early in the design process.

Design teams will evaluate project-specific variables including, but not limited to, construction type, occupancy classification, and the location of the system within the building. These factors directly influence allowable materials, fire-resistance requirements, and the design of fire protection systems. Compliance with the California Building Code (CBC), California Fire Code (CFC), and applicable standards such as NFPA 13 is required.

Material selection must align with the building's construction type and applicable code provisions. Interior finishes must meet flame spread and smoke development requirements, and any plastics or combustible materials must be evaluated in accordance with applicable code sections. Mechanical, electrical, and plumbing components must also comply with applicable code requirements.

Fire-resistance-rated construction must remain continuous and uncompromised. When preapproved fabricated components and systems are not intended to serve as part of required fire-resistance-rated assemblies, the adjacent fire-resistance rated assemblies must be constructed and maintained independently to meet required ratings. The system will be reviewed for compliance with furred out requirements of CBC 8 and concealed space requirements. When preapproved fabricated components and systems are intended to serve as part of the fire resistance rated assembly, tested, listed, approved assemblies are to be used with details provided, and all applicable code requirements met.

All penetrations and openings through rated assemblies must be properly protected using listed, tested and approved firestopping systems. Additionally, any structural modifications such as floor depressions must be coordinated to ensure compliance with tested horizontal assembly requirements.

Concealed spaces created between preapproved fabricated components and systems and adjacent construction must be carefully evaluated. Sprinkler protection within concealed spaces may be required. Concealed spaces will require evaluation for sprinkler protection, insulation, or other methods in accordance with NFPA 13. Coordination with the sprinkler designer and architect of record is essential.

The placement of preapproved fabricated components and systems must not adversely impact the means of egress system. Compliance with CBC Chapters 4, 7 & 10 must be maintained, including, but not limited to, travel distance limitations, corridor configurations, suite configurations, and door operation requirements. Doors serving the systems must meet CBC 716 requirements, including compliance with hardware and operational requirements, be free egress or meet code requirements for controlled egress where controlled egress devices are permitted by code.

Fire alarm and sprinkler systems must be fully coordinated with the preapproved fabricated components and systems design. Detection and notification coverage must be provided as required for the intended use. Sprinkler systems must account for system size, configuration, concealed spaces, and all other applicable code and referenced standards requirements. Designers must provide sufficient detail, including dimensions of concealed areas, to support proper system design.

Successful implementation of preapproved fabricated components and systems requires strong coordination across all disciplines. Structural, architectural, and fire protection elements must be aligned to ensure compliance without compromising constructability. For questions or project-specific conditions, coordination with the appropriate fire and life safety staff is recommended. Early engagement with the design team and HCAI OSHPD is also recommended to address project-specific conditions and avoid delays.

This guide is not exhaustive; project-specific conditions may require additional analysis.

\*HCAI/OSHPD approval of a preapproved fabricated components and systems is **not** equivalent to material or equipment approval and listing by the State Fire Marshal per Title 19, Division 1, Chapter 1.5. Please **do not label or identify** the preapproved fabricated components and systems as approved and listed by the California State Fire Marshal.

## 1. Purpose and Applicability

- Provide fire and life safety design considerations for preapproved fabricated components and systems installed within buildings.
- Applicable to all project types where preapproved fabricated components and systems are integrated into a structure.

## 2. General Considerations

- Evaluate project-specific variables, including:
  - Construction type
  - Use
  - System location within the building
  - Fire-resistance requirements
  - Fire alarm and sprinkler systems
- Coordinate early with design team to address integration with building systems.
- Confirm compliance with applicable parts of California Code of Regulations (CCR) Title 24, applicable chapters and sections of California Building Code, California Fire Code, and referenced standards such as NFPA 13, NFPA 72.

### 3. Materials and Construction

- Materials must comply with allowable construction type and fire resistance rated assembly requirements (CBC Chapter 6 & 7).
- Interior wall and ceiling finishes must meet CBC Chapter 8 requirements.
- Plastics, if allowed in the system, must comply with CBC Chapter 26, all other applicable code sections and referenced standards.
- Mechanical, electrical, and plumbing materials must comply with applicable CBC, CMC, and CPC provisions, and referenced standards.
- Use noncombustible materials where required by construction type.

### 4. Fire-Resistance-Rated Construction

- Maintain continuity of fire-resistance-rated assemblies (CBC Chapter 7).
- When preapproved fabricated components and systems are not intended to serve as part of required fire-resistance-rated assemblies, the adjacent fire-resistance rated assemblies must be constructed and maintained independently to meet required ratings. The system will be reviewed for compliance with furred out requirements of CBC 8 and concealed space requirements.

When preapproved fabricated components and systems are intended to serve as part of the fire resistance rated assembly, tested, listed, approved assemblies are to be used with details provided, and all applicable code requirements met.

- Coordinate installation sequence:
  - Determine whether systems are installed before or after fire resistance rated construction.
  - Ensure constructability (e.g., system access into completed spaces).
- Provide details for:
  - Fire resistance rated assemblies (walls and floor/ceiling, roof/ceiling) and listed approved assemblies and numbers
  - Penetrations through rated assemblies
  - Fire smoke damper locations
  - Floor/ceiling assembly continuity (CBC 711)
  - Depressions or structural modifications affecting rated assemblies
  - Furred/Set-Out construction requirements between system and fire resistance rated assemblies (CBC 803.15)
  - All other applicable details

## 5. Concealed Spaces

- Evaluate concealed spaces between the system and adjacent construction
- Concealed space protection above system and between horizontal floor/ceiling, roof/ceiling assembly may be required per NFPA 13.

Evaluate need for:

Sprinkler protection

Insulation/concealed space fill

Other compliant methods per NFPA 13

Coordinate with sprinkler designer and architect of record.

## 6. Means of Egress (CBC Chapters 4, 7 & 10)

- Ensure system placement does not compromise egress requirements, including:
  - Travel distance
  - Access through intervening rooms
  - Corridor, suite and smoke compartment relationships
- Door requirements:
  - Free egress
  - Appropriate hardware and applicable code requirements (e.g., delayed egress, controlled egress, anti-ligature as applicable)
- Maintain required widths, clearances, and accessibility.

## 7. Fire Alarm Systems

- Provide fire alarm, notification devices, initiation devices, coverage in accordance with applicable codes.
  - Coordinate detection within and around preapproved fabricated components and systems.
  - Identify perforation location for devices.
  - Ensure system integration with the building fire alarm system.
  - Fire smoke damper location

## 8. Automatic Sprinkler Systems

- Provide sprinkler protection in accordance with CBC/CFC Section 903 and NFPA 13.
- Evaluate:
  - Coverage within the system
  - Concealed spaces above ceilings and below raised floors
- Provide dimensions of concealed spaces to support sprinkler design and applicable code/referenced standards requirements.
  - Coordinate sprinkler layout with system size and configuration, and installation sequence.

## 9. Coordination and Installation Considerations

- Coordinate:
  - Structural openings (e.g., floor depressions, penetrations)
  - Drain locations and alignment
  - Timing of core drilling and installation
  - Ventilation openings
- Ensure modifications do not compromise fire-resistance-rated assemblies.
- Provide clear identification for critical systems (e.g., electrical circuits where required).

## 10. Documentation Requirements

- Provide plans and details demonstrating:
  - Code-compliant material selection
  - Fire-resistance-rated assembly continuity
  - Penetration protection
  - Fire alarm and sprinkler coverage
  - Egress compliance
  - Opening protection (e.g. dampers, glazing, doors)
- Include coordination details between disciplines.

Provide notes when items will be provided separate from preapproved fabricated components and systems

## 11. Support and Coordination

- Early coordination with HCAI OSHPD is recommended.
- For project-specific questions, consult the design team and applicable HCAI/OSHPD staff

## 12. Common Pitfalls and Coordination Challenges

The following items represent common issues observed in the design and installation of preapproved fabricated components and systems. Addressing these early in the design process can help avoid delays, redesign, and compliance concerns.

### Fire-Resistance-Rated Construction

- Preapproved fabricated components and systems relation to required fire-resistance-rated assemblies
- Discontinuities in rated walls, floors, or ceilings at system interfaces
- Incomplete or missing firestopping at penetrations through rated assemblies
- Failure to account for structural modifications (e.g., floor depressions) in tested fire-resistance designs

### Installation Sequencing and Constructability

- Designing system placement without considering installation sequence
- Systems not fitting through openings after rated assemblies are constructed
- Lack of coordination between preapproved fabricated components and systems delivery and building construction timeline

### Concealed Spaces

- Overlooking concealed spaces created between the system and adjacent construction
- Not evaluating combustible vs. noncombustible conditions
- Missing or unclear sprinkler protection requirements for concealed spaces
- Lack of coordination with the sprinkler designer and architect of record

### Means of Egress

- System placement reducing required egress width or travel distance compliance

- Doors not meeting required egress operation (e.g., hardware, power operation, delayed egress conditions)
- Improper placement relative to corridors, suites, or required exit components

### Fire Alarm Systems

- Gaps in detection coverage within or around preapproved fabricated components and systems
- Failure to account for perforations or openings affecting detection coverage
- Lack of integration with the building fire alarm system

### Automatic Sprinkler Systems

- Omission of sprinkler protection in concealed or obstructed spaces
- Inadequate coordination of sprinkler head locations with system configuration
- Missing or incomplete dimensions for concealed spaces impacting system design

### Materials and Code Compliance

- Use of materials not permitted for the building's construction type
- Noncompliant interior finishes
- Improper use of plastics or combustible materials without proper evaluation

### Coordination Across Disciplines

- Limited coordination between architectural, structural, MEP, and fire protection teams
- Late identification of conflicts affecting fire and life safety systems
- Incomplete documentation demonstrating compliance with applicable codes

### Documentation

- Missing details for penetrations, rated assembly continuity, or system integration
- Inconsistent or unclear code references
- Lack of clarity on responsibilities between design team members

Addressing these considerations early in the design process supports efficient project delivery and helps ensure compliance with applicable fire and life safety requirements.

## Reminder List

The following items are provided as a general reminder to support design and submittal completeness. This list is not all-inclusive, and additional project-specific requirements may apply.

### General

- Applicable codes identified (CBC, CFC, CMC, CPC, CEC, NFPA standards)
- Construction type and occupancy classification confirmed
- System location within the building clearly indicated

### Materials

- Materials comply with construction type requirements
- Interior finishes meet CBC Chapter 8 requirements
- Plastics evaluated per CBC Chapter 26 and other applicable sections
- MEP materials comply with applicable codes

### Fire-Resistance-Rated Construction

- Rated assemblies identified and maintained
- Preapproved fabricated components and systems relation to rated construction
- Penetrations through rated assemblies detailed and protected
- Openings through rated assemblies detailed and protected
- Floor/ceiling continuity maintained (including depressions or openings)

### Concealed Spaces

- Concealed spaces identified and evaluated
- Combustible vs. noncombustible conditions addressed
- Sprinkler protection or alternative method provided where required

### Means of Egress

- Travel distance compliant
- Required widths and clearances maintained
- Door operation and hardware compliant
- Egress relationship to corridors, suites, smoke barriers/smoke compartments and exits addressed

### Fire Alarm

- Detection coverage provided within and around system
- Coordination with building fire alarm system confirmed
- Conditions affecting detection addressed

### Sprinklers

- Sprinkler coverage provided within system
- Concealed spaces evaluated for protection
- Dimensions of concealed spaces provided

- Coordination with system design demonstrated

#### Coordination / Installation

- Installation sequence considered
- Access and constructability verified
- Structural coordination (e.g., penetrations, depressions) addressed
- Drain, duct, damper locations and alignment coordinated

#### Documentation

- Plans clearly show compliance with applicable codes
- Details provided for rated assemblies and penetrations
- Fire alarm and sprinkler systems coordinated and documented

### **AMC**

#### Alternate Means of Compliance (AMC)

##### Purpose

An Alternate Means of Compliance (AMC) provides a process for proposing materials, systems, or designs that are not explicitly prescribed by code, but can be demonstrated to meet the intent of the code and provide an equivalent level of safety and performance.

This process can be particularly useful in preapproved fabricated components and systems design, where preapproved configurations may require modification based on project-specific conditions.

##### When to Consider an AMC

Consider submitting an AMC when:

A proposed design, material, or system is not specifically addressed in the code

Project-specific conditions require deviation from standard prescriptive requirements

Preapproved fabricated components and systems configurations need to be adapted to field conditions

Equivalent fire and life safety performance can be achieved through an alternative approach

##### AMC Submittal

Review CBC 104.2.3-104.2.3.6.2 and 1.11.2.4

## Plan Review Programs - HCAI

### Step 1 – Identify the need

Clearly define the condition or requirement that cannot be met prescriptively

Identify the applicable code section(s)

Describe the proposed alternative approach

### Step 2 – Prepare a written request

Submit a formal written request that includes:

Description of the proposed alternative:

Material, system, equipment, or method

Full explanation of the conditions and constraints

Identification of how the proposal differs from prescriptive code requirements

### Step 3 – Demonstrate code intent compliance

Explain how the proposed alternative meets the intent of the code

Clearly articulate the fire and life safety objectives being maintained

### Step 4 – Provide equivalency justification

The proposed alternative shall be demonstrated to be not less than equivalent to the prescriptive code requirements with respect to:

1. Quality
2. Strength
3. Effectiveness
4. Durability
5. Safety, other than fire safety
6. Fire safety

### Step 5 – Provide supporting documentation

Include sufficient evidence to substantiate the request, which may include:

## Engineering analysis

- Design calculations

- Evaluation reports from approved agencies

- Technical documentation demonstrating performance

## Step 6 – Provide testing (if required)

- Testing may be required to demonstrate equivalency

- Fire testing must be representative of end-use conditions

- Testing must be performed by an approved and acceptable entity

## Step 7 – Submit reports

Provide supporting reports as applicable:

- Evaluation reports from approved agencies

- Alternative reports prepared by qualified professionals (engineer, specialist, or laboratory)

- Reports must clearly define:

- Criteria used

- Testing or analysis performed

- Basis for equivalency

## Step 8 – Design team coordination

- Ensure alignment between all disciplines (architectural, structural, MEP, FLS)

- Confirm that the proposed alternative is consistently reflected across all documents

## Step 9 – Submit for review

- Submit the complete AMC package for review

HCAI OSHPD will:

- Approve the request, or

- Provide written comments or reasons for denial

## Understand approval limitations

- Approval is project-specific

- Approval does not establish precedent for future projects

## Additional considerations

- HCAI OSHPD may require additional testing or documentation

- Hazardous materials (if applicable) may require consideration of a Risk Management Plan (RMP)

- Alternate systems must meet applicable administrative and structural requirements (e.g., ASCE 7, California Administrative Code 7-104)

## Use of AMC for preapproved fabricated components and systems

The AMC process can be an effective tool when addressing fire and life safety considerations for preapproved fabricated components and systems, particularly when:

- Preapproved designs require modification due to site conditions

- Integration with building systems creates unique constraints

- Standard prescriptive solutions are not feasible

In these cases, the AMC provides a structured and acceptable path to demonstrate that the proposed solution maintains the required level of fire and life safety.

## Additional Resources

Additional guidance, templates, and submittal information are available on our website:

[Forms, Applications, & Reminder Lists - HCAI](#)