A1.3 Code Compliance, Code Analysis and Building Permits

NOTE: Significant revisions or additions to the previous standards are highlighted in italics.

GENERAL
All projects require a code review and acceptance from the Authority Having Jurisdiction (AHJ) before specific phases of the project can be started. Failure to follow the submittal process will result in possible delays, redesign and/or fines from the AHJ.

The Authority Having Jurisdiction for projects completed for the State of Kansas is, by statute, the Office of the State Fire Marshal (OSFM, or KSFMO). Some of the AHJ's duties are delegated by memorandum of understanding by the State Fire Marshal's office to the State of Kansas, Dept. of Administration, Office of Facilities & Property Management - Design, Construction & Compliance (OFPM-DCC).

The OFPM website - http://admin.ks.gov/offices/ofpm/dcc/bdcm/ provides current review requirements and submittal forms and is updated every quarter or in some cases whenever a change is needed. Changes are made without prior notice; therefore submittal documents must be downloaded and used from their site. Failure to use the correct form might result in a review delay.

** NOTE - IMPORTANT: Effective January 1, 2015 a major shift in the code footprint review process was announced by OFPM. As of that date, OFPM will no longer be reviewing and accepting code footprints or temporary egress/construction separation documents for projects that fall under the jurisdiction of the Office of the State Fire Marshall (OSFM, or KSFMO). OSFM will be responsible for the review and acceptance of these documents for all agencies as outlined in KAR 22-1-7.

OFPM will continue to coordinate all reviews, so the submittal process as outlined in the OFPM manual and use of OFPM forms will remain unchanged at this time. OFPM will continue to issue Project Acceptance Form 125 when OSFM has completed their review and OFPM has received the signed code footprint.

A/E will be required to submit a separate document to OFPM that includes toilet fixture and accessibility requirements, as this information will no longer be permitted to be on the code footprint.

The Agency and Project A/E contacts as listed on the Request for Review form will be copied by email on all correspondence sent from OFPM to OSFM.

** DCM NOTE: This State of Kansas process is subject to further changes and refinements, so Project Designers shall verify the current code footprint review and approval processes for each project before beginning the design phase.

CODE ANALYSIS
The Architect/Engineer is responsible to provide a full analysis of code compliance for every design, and to document that analysis on a Code footprint. DCM is responsible to oversee
this process, and to review submittal documents for completeness and adherence to OSFM, OFPM and DCM standard practices.

KU's University Fire Marshal Authority (UFMA) are DCM staff who are responsible for managing all associated submittal processes, and for reviewing the fire and life safety systems for all projects for compliance with the listed building codes and regulations, and with the Kansas Fire Prevention Code, throughout the design and construction process.

CODE FOOTPRINT

A code footprint (CFP) will be required on all University of Kansas projects, including those which are privately-funded and which are being built on non-state property and are therefore subject to code review and permitting by a City AHJ, such as the City of Lawrence or the City of Overland Park. The following guidelines apply to all KU projects.

- Submit per OFPM and DCM graphic standards.
- If you're unsure if a code footprint is required or not, review and answer all OFPM “Is A Code Footprint Required” form check sheet items, and confirm with UFMA.
- Utilize OFPM symbol legend; do not delete any symbols, symbols can be added.
- Utilize DCM templates for cover sheet and for site and floor plans. CFPs which do not use the standard KU template will be rejected. DCM will provide the current code footprint template to Project Designers upon request.
- Include all required items per KSFMO Fire Fact 61 and OFPM Building Manual see chapter 7.
- Include all existing and proposed special agreements which would include any alternate means and methods that would need to be negotiated during the design process. IMPORTANT- if any alternate method is not documented on the CFP it is NOT agreed to and will be rejected.
- Utilize 11x17 inch sheet format, black and white, in the approved AutoCAD format.
- Inserted complete CFP on the construction documents at a 1:1 scale - never reduced or oriented differently than the floor plans on the contract documents. Utilize original signed and sealed CFP on CDs if available at the time of printing. Issue the signed and approved document as a change order to make it a part of the Contract Documents if not included on the original CD sheets.
- The CFP shall be strictly in accordance with the prescribed codes. Variances, alternate means and methods or equivalent designs will not be considered in new construction unless agreed to by the Authority Having Jurisdiction (AHJ) and by the agency (KU-DCM) in writing before the Schematic Design stage is complete.
- When utilizing the KU small scale drawings, Designers are required to field-verify all critical information that may affect or be affected by the project's particular requirements. KU small scale drawings are diagrammatic and may not reflect recent changes to the building.
- Provide an As-Built CFP if changes were made during construction that affect the content of the CFP. Submittal shall be in both AutoCAD and PDF formats. All sheets in a PDF submittal shall be in one file.
Provide a separate electronic submittal, along with a complete printed copy of the CFP submittal to DCM-UFMA, attention: Bob Rombach at brombach@ku.edu.

CFP shall include, but may not be limited to, the following information:

- The total gross square footage of each level in the facility.
- Occupancy group(s) and separations with graphic lines.
- Type(s) of construction.
- The square footage of each assembly occupancy and the calculated occupant loads within each space.
- Chemical control zones with projected chemical quantities (research labs).
- Dashed line of major egress routes to required exits, with cumulative occupant loads at junctions with tributary egress routes.
- Clearly designate each required exit, at both interior and exterior locations.
- Provide total occupant load & calculated egress width at each required exit & actual exit width per graphic legend.
- Indicate areas of refuge at required exits that are not accessible exits for the disabled, in non-sprinklered buildings.
- Hourly ratings for fire-rated walls, partitions and roof-ceiling assembly; include in bid docs, as part of partition schedules, details, &/or wall sections or building sections.
- Fire extinguisher locations and lines indicating radii of coverage in public access area, per NFPA 10. Show required extinguishers in labs or special systems.
- Local hydrant tests related to water pressure and volume for sprinkler system design if applicable. The information must be no more than 3 years old.
- Location of fire hydrants and fire access lanes on site. Graphically show the 300 foot radius to fire apparatus and 150 foot radius for fire hose reach requirements from the staged apparatus to every exterior part of the building.
- Distances from building to assumed or actual property lines.
- Standpipe and post indicator valve locations.
- Primary fire department access, verify with KU Fire Marshal and City fire department.
- Fire Department "Knox box" locations on exterior of building.
- Main fire alarm control panel and remote annunciator panel locations.
- Area Of Refuge master intercom call station location, if provided
- Storm shelter locations, if any.
- Show other critical code compliance and life safety information.

**Temporary Egress Plan:** Show locations of temporary exit stairs and/or egress paths during construction on a separate temporary egress sheet, if needed. Show 1 hour fire-rated construction separation partitions; *not less than 1/2"* gypsum board on each side of metal studs at 24" o.c.; joints do not need to be taped.
PERFORMANCE-BASED DESIGN

Performance-based code compliance design shall not be allowed or considered in new construction, and is discouraged in all cases. Performance-based design will be considered for projects in existing facilities only on a case-by-case basis.

SUBMITTAL PROCESS - GENERAL

Refer to Chapter 5 of the OFPM “Building Design and Construction Manual” for detailed OFPM requirements of the submittal and inspection processes outlined below. All submittals must be processed through UFMA. Submittals sent directly to OFPM will not be processed without special prior arrangements agreed to by UFMA and OFPM.

Compliance Submittals: All compliance submittals must go through UFMA, who will review for completeness and submit to OFPM. If items are found which need correction, comments will be issued by UFMA to the A/E.

OFPM State Project Number: Must be included on all Requests for Review forms and documents sent to OFPM. The KU project name and number must also be included. Both numbers shall be listed in the subject line of emails to DCM, UFMA, KSFMO and OFPM which are related to the code compliance review submittals and correspondence.

Is a CFP (Code Footprint) Required: This form is no longer submitted to OFPM, but it is available at the OFPM website for reference and may be used to confirm if a CFP is required for a project. Project Designers shall consult with UFMA if they feel a CFP may not be required, and UFMA will consult with KSFMO and/or OFPM as necessary to make a final determination.

Review Time: KSFMO and OFPM typically require two (2) weeks for review and processing of each submittal. After two weeks it is recommended that the A/E directly request a status update on the review from OFPM. Copy the DCM Project Manager and University Fire Marshal with any requests for status updates.

SUBMITTAL PROCESS - CODE FOOTPRINTS

Code Footprint (CFP) Preliminary Submittal: In-progress CFPs shall be submitted to DCM-UFMA during the Schematic Design phase, at the earliest possible opportunity. DCM review at this stage is to provide feedback and guidance to the Project Designer, and to confirm that a code-compliant project design is being proposed.

CFP Final Submittal: A signed and sealed final CFP is required to be submitted by the Project Designer to UFMA immediately following the conclusion of the Design Development phase of work, along with a completed Request for Review form. These will be reviewed by the DCM Project Manager and the University Fire Marshal before the Agency signature is applied. If UFMA does not believe them to be fully code-compliant, UFMA will issue comments and directions to the Project Designer, who will then make the necessary revisions and re-submit the final signed/sealed CFP and Request for Review form to UFMA for processing.

- Designers shall submit the following documents to UFMA for processing:
  - Two sets of printed, single-sided bound copies of the CFP on 11 x 17 paper.
Two sets of printed, 8-1/2 x 11 Request for Review forms. The Agency contact on this form shall be listed as Bob Rombach for all projects.

One electronic PDF copy of the CFP and the Request for Review form on a CD or DVD disk, with a printed label per OFPM's manual which includes DCC and KU project number, project title, document submittal date, firm name, file format, and a description of the submittal (i.e. Construction Documents, Specifications, etc.)

Hand lettering directly onto CD/DVD or onto an applied label, and electronic files submitted on USB flash drives will NOT be accepted.

UFMA will then forward the CFP submittal documents to OFPM, who will forward to KSFMO for formal approval.

KU has a courier who can deliver documents to Topeka every Monday, Wednesday and Friday at 10am. Allow not less than one business day for DCM/UFMA review and processing.

CFP Comments: KSFMO's comments are submitted by OFPM to the Single Agency contact and to the A/E listed on the Request for Review form. It is the responsibility of the A/E to respond directly to KSFMO and/or correct the CFP per KSFMO's comments and copy UFMA and the necessary DCM parties. Revised CFPs, if needed, will require a re-issue of the package and re-submittal through DCM.

CFP Approval: A Permit to Build for approval to start construction will typically be withheld pending final submittal and approval of the construction documents (CD) by OFPM.

SUBMITTAL PROCESS - CONSTRUCTION DOCUMENTS

Construction Documents (CD) Preliminary Submittal: Project Designers shall submit preliminary CDs to DCM & UFMA for preliminary review and comments, since they have project management responsibilities. OFPM does not have project management responsibilities on KU projects, and does not review preliminary submittals in detail. They will offer preliminary code clarification on specific issues if identified clearly; however, they will only fully review the construction documents when they are final.

CD Final Submittal: Designers shall submit a final sealed set of plans to OFPM through DCM, using the same process as the CFP submittal, even if they receive those same plans for printing.

It must have its own Request for Review form and be tracked separately.

If OFPM is printing the construction documents, Designers shall still send a separate sealed set through the process above to be properly reviewed. Failure to do so may result in a delay in getting the Permit to Build.

CD Comments: Same process as CFP comments. Please respond to each item, correct drawings as needed and copy all necessary parties. Supplemental drawings are recommended. Request a status update of the OFPM review after 2 weeks.

Construction Document Acceptance: OFPM will send an electronic acceptance form to the Agency Contact (Bob Rombach/UFMA) and the A/E.
DCM will then process the acceptance, verify accuracy, log all activities and issue a KU “Permit to Build” form, which will include the approved final CFP and necessary inspection requirements and shop drawing submittal requirements.

Changes, revisions or clarifications to the design after this point which affect code compliance features must be submitted to OFPM and the University Fire Marshal for review.

Changes to any features shown on the CFP will require the CFP to be updated and re-accepted before a Certificate of Occupancy can be issued by OFPM. The CFP re-submittal shall be done using the original process submitted for review and signature to DCM/UFMA.

SUBMITTAL PROCESS - SHOP DRAWINGS

Fire Alarm Shop Drawing Submittal: This is required before the construction work can start on the fire alarm system. The A/E is to submit the engineered reviewed shop drawing and a completed Request for Review form to DCM-UFMA. After UFMA review, they will be submitted to OFPM for final compliance review.

Fire Sprinkler Shop Drawing Submittal: This is required before the construction work can start on the fire sprinkler system. The A/E is to submit the Engineered reviewed shop drawing along with a REQUEST FOR REVIEW form to DCM attention Bob Rombach. After a DCM review they will be submitted to OFPM for final compliance review.

Note: Failure to include the Request for Review form or sending the shop drawings directly to OFPM will result in them not being reviewed, which will result in a denial of the Certificate of Occupancy at the time of project completion.

BUILDING PERMIT

A building permit will be issued by the University Fire Marshal Authority (UFMA) and is required before construction is permitted to proceed on all projects on State of Kansas and KU Endowment-owned property.

On State of Kansas property, UFMA permits are issued after all approvals for construction are received from OFPM, who is the Authority Having Jurisdiction on these matters.

On KU Endowment property, UFMA permits are issued when KSFMO reviews and approves a code footprint submitted through UFMA, and after the City AHJ has issued their building permit.

City permits and City inspection are required on KU Endowment-owned land.

Projects on privately owned land and KU Endowment land are subject to the Jurisdiction of the City in which they are located. For the City of Lawrence, City review, permitting and inspections apply. If the buildings are for the use of University personnel and programs, they are also subject to State Fire Marshal and University Fire Marshal review, permitting and inspections.

Projects started without a building permit will be stopped. Possible fines of $1,000 per calendar day will be assessed by the State Fire Marshal, along with an order to Cease
and Desist sent to the Chancellor. To avoid this legal action from the State, the KU Fire Marshal shall issue a stop work order.

CERTIFICATE OF OCCUPANCY

- **Final or Partial**: OFPM requires the A/E to request the Certificate of Occupancy concurrent with the request for the OFPM field inspector’s inspection. Partial occupancy can be granted if an area is completed and defined as such on a plan by the A/E.

- **Temporary Certificate of Occupancy**: OFPM will NOT issue temporary Certificate of Occupancies. If a project or area is not complete, they will **not** issue the Certificate of Occupancy and the area requested cannot be occupied. If found occupied, OFPM will send a notice to the State Fire Marshal who will order a Cease and Desist and assess a fine.