

Guide
to the
Letters of Assurance
in the
B.C. Building Code
2006

December, 2010
Edition 5a

Building & Safety Standards Branch
Ministry of Public Safety & Solicitor General
Province of British Columbia

GUIDE TO THE LETTERS OF ASSURANCE

BC BUILDING CODE 2006

FOREWORD

- 1. PURPOSE OF THE GUIDE**
- 2. DEFINED TERMS IN THE LETTERS OF ASSURANCE**
- 3. SCOPE OF LETTERS OF ASSURANCE**
- 4. THE COMMUNITY CHARTER, AND OTHER MEANS OF ACHIEVING ACCOUNTABILITY**
- 5. ROLES AND RESPONSIBILITIES FOR LETTERS OF ASSURANCE**
- 6. HOW TO COMPLETE AND SUBMIT LETTERS OF ASSURANCE**
- 7. DEALING WITH CHANGES IN REGISTERED PROFESSIONALS OF RECORD AFTER A BUILDING PERMIT IS ISSUED**
- 8. DESIGN AND FIELD REVIEW CONDUCTED BY DIFFERENT REGISTERED PROFESSIONALS OF RECORD**
- 9. APPLICATION OF LETTERS OF ASSURANCE TO PART 9 BUILDINGS**
- 10. APPLICATION OF LETTERS OF ASSURANCE TO GEOTECHNICAL CONDITIONS**
- 11. APPLICATION OF LETTERS OF ASSURANCE TO BUILDING ALTERATIONS AND TENANT IMPROVEMENTS**
- 12. APPLICATION OF LETTERS OF ASSURANCE TO PHASED BUILDING PERMITS AND PHASED OCCUPANCIES**
- 13. APPLICATION OF LETTERS OF ASSURANCE TO PART 10 REQUIREMENTS**
- 14. APPLICATION OF LETTERS OF ASSURANCE TO CIVIL WORKS**
- 15. ANCHORAGE AND SEISMIC RESTRAINT**
- 16. ALTERNATIVE SOLUTIONS**
- 17. USE OF PROFESSIONAL SEAL**

GLOSSARY

AHJ	<i>Authority Having Jurisdiction</i>
BCBC	<i>British Columbia Building Code 2006</i>
CRP	<i>Coordinating Registered Professional</i>
LOA	<i>Letters of Assurance</i>
RPR	<i>Registered Professional of Record</i>
RP	<i>Registered Professional</i>
SRP	<i>Supporting Registered Professional</i>

Guide to the Letters of Assurance in the BC Building Code 2006

Foreword

This Guide to the Letters of Assurance in the BC Building Code 2006 is jointly endorsed by the Architectural Institute of BC and the Association of Professional Engineers and Geoscientists of BC, and was developed with the cooperation and assistance of the Building Officials' Association of BC, the Union of BC Municipalities, and the Building and Safety Standards Branch of the Province of British Columbia.

Questions relating to this Guide should be addressed to the [Building and Safety Standards Branch](mailto:Building.Safety@gov.bc.ca) [Building.Safety@gov.bc.ca].

Questions relating to professional practice of engineers or architects should be directed respectively to:

Peter Mitchell, P.Eng
Director, Professional Practice and Ethics
Association of Professional Engineers and Geoscientists of BC
200 – 4010 Regent Street
Burnaby, BC V5C 6N2
Telephone: 604 430-8035
Fax: 604 430-8085
Email: pmitchell@apeg.bc.ca

Maura Gatensby, MAIBC
Director of Professional Services
Architectural Institute of BC
Suite 100 – 440 Cambie Street
Vancouver, BC V6B 2N5
Telephone: 604 683-8588
Fax: 604 683-8568
Email: mgatensby@aibc.ca

PURPOSE OF THE GUIDE

The purpose of this Guide to Letters of Assurance in the BC Building Code 2006 (BCBC 2006) is to foster the appropriate and consistent use and application of BCBC 2006 Letters of Assurance. It provides guidance on:

- The scope and intent of BCBC 2006 Letters of Assurance,
- Roles and responsibilities of persons executing Letters of Assurance,
- When and how Letters of Assurance should be completed.

This Guide provides guidance only on BCBC 2006 requirements for Letters of Assurance. It does not address scope of practice or other issues for which the regulatory bodies for *registered professionals*, i.e. the AIBC and the APEGBC, are responsible. Readers should be aware that there are additional requirements in the Architects Act and the Engineers and Geoscientists Act that determine when and on what type of projects such *registered professionals* are required by law to provide services.

DEFINED TERMS IN THE LETTERS OF ASSURANCE

Letters of Assurance, otherwise known as Schedules A, B, C-A and C-B, are legal accountability documents under Section 2.2.7 in Part 2 of Division C of the BCBC 2006. All italicized words in the Letters of Assurance are defined terms in the BCBC 2006 and have the same meaning set out in that regulation.

SCOPE OF LETTERS OF ASSURANCE

BCBC 2006 Requirements for Design and Field Review

Section 2.2.7 in Part 2 of Division C of the BCBC 2006 specifies when Letters of Assurance are required.

2.2.7. Professional Design and Review

2.2.7.1. Application

1) The requirements of this Subsection apply to

- a) *buildings* within the scope of Part 3 of Division B,
- b) *buildings* within the scope of Part 9 of Division B that are designed with common egress systems for the occupants and require the use of *firewalls* according to Article 1.3.3.4. of Division A, or
- c) the following, in respect of *buildings* within the scope of Part 9 of Division B other than *buildings* described in Clause (b),
 - i) structural components that are not within the scope of Part 9 of Division B (See Appendix A.),
 - ii) geotechnical conditions at *building* sites that fall outside the scope of Part 9 of Division B,
 - iii) sprinkler systems designed to NFPA 13, "Installation of Sprinkler Systems", or
 - iv) standpipe and hose systems designed to NFPA 14, "Installation of Standpipe and Hose Systems".

BCBC 2006 Letters of Assurance apply to all Part 3 *buildings*. Letters of Assurance do not apply to Part 9 *buildings*, except for Part 9 *buildings* or their components that fall within the scope of Subsection 2.2.7. in Part 2 of Division C.

Chapter 9 of this Guide ("Application of Letters of Assurance to Part 9 Buildings") provides information and guidance on aspects of Part 9 projects to which Letters of Assurance may apply.

Chapter 11 of this Guide ("Application of Letters of Assurance to Building Alterations") provides information on the application of BCBC 2006 Letters of Assurance to *alterations* and tenant improvements to existing *buildings*. *Alterations* to existing *buildings*, including tenant improvements, will require Letters of Assurance if the work involves components that fall within the scope of Subsection 2.2.7. in Part 2 of Division C.

Chapter 12 of this Guide ("Application of Letters of Assurance to Phased Building Permits and Occupancies") provides information on the application of BCBC 2006 Letters of Assurance to phased building permits and phased occupancies.

What Are Letters of Assurance

Letters of Assurance are legal accountability documents that are required under the BCBC 2006, intended to clearly identify the responsibilities of key players in a construction project. Uniform, mandatory Letters of Assurance have been included as Schedules in the BC Building Code since December 1992.

The BCBC 2006 requires Letters of Assurance in specific instances to document the parties responsible for design and *field review* of construction, and to obtain their professional assurances that the work substantially complies with the requirements of the BCBC 2006, except for construction safety aspects, and that the requisite *field reviews* have been completed. Construction safety is the responsibility of the *Constructor*.

Letters of Assurance, located in Part 2 of Division C of the BCBC 2006, consist of the following Schedules:

Schedule A – Confirmation of Commitment by Owner and Coordinating Registered Professional

This assurance by the *owner* and the *coordinating registered professional* must be submitted to the *authority having jurisdiction* before issuance of a building permit; submission of Schedule A is a pre-condition for issuing a building permit.

Note that in jurisdictions that do not issue building permits, Letters of Assurance are still required if the project falls within the scope of Section 2.2.7 in Part 2 of Division C of the BCBC 2006. In such cases the Letters of Assurance should be collected and retained by the *coordinating registered professional*.

This Schedule confirms that the *owner* has retained a *coordinating registered professional* who will

- ascertain which disciplines are required on the project, and which *registered professionals of record* will need to be retained, and
- coordinate design work and *field reviews* including coordination of functional testing of fire protection and life safety systems by all *registered professionals of record* required on the project.



See Chapter 5 “Roles and Responsibilities for Letters of Assurance” for further details on the responsibilities of *owners* and *coordinating registered professionals* with respect to Schedule A.

Schedule B – Assurance of Professional Design and Commitment for Field Review & Summary of Design and Field Review Requirements

The Schedule B for each *registered professional of record* retained on the project must be submitted to the *authority having jurisdiction* prior to the commencement of construction activities of the components identified. Submission of the full suite of Letters of Assurance (one Schedule A, and a Schedule B for each discipline of *registered professionals of record*) is a necessary condition for construction to commence.

The complete set of Schedule Bs serves to document all the *registered professionals of record* who have taken responsibility for an applicable discipline on a project.

Schedule B confirms that the *registered professional of record* signing and sealing it will be responsible for design and *field review* within the discipline which he or she has initialled.

The Schedule B also serves to document the specific BCBC 2006 items within each discipline for which a *registered professional of record* will be undertaking design, *field review* and functional testing.



See Chapter 5 “Roles and Responsibilities For Letters of Assurance” for further details on the responsibilities of *coordinating registered professionals* and *registered professionals of record* with respect to Schedule B.

Schedule C-A – Assurance of Coordination of Professional Field Review

A Schedule C-A must be submitted by the *coordinating registered professional* after completion of the project but before an occupancy permit is issued or a final inspection is made by the *authority having jurisdiction*.

Schedule C-A provides assurance that the *coordinating registered professional* has done what he or she undertook to do on the Schedule A, specifically:

- fulfilled the obligation for coordination of *field reviews* of the *registered professionals of record* retained on the project, and
- coordinated the functional testing of the fire protection and life safety systems to ascertain that they substantially comply in all material respects with:
 - o the BCBC 2006 and other enactments respecting safety, except for construction safety aspects, and
 - o the plans and documents submitted for building permit application.



See Chapter 5 “Roles and Responsibilities For Letters of Assurance” for further details on the responsibilities of *owners* and *coordinating registered professionals* with respect to Schedule C-A.

See Chapter 12 “Application of Letters of Assurance to Phased Building Permits and Occupancies” for information on the acceptable use of Letters of Assurance when occupancy permits are sought for portions of a building project.

Schedule C-B – Assurance of Professional Field Review and Compliance

A separate Schedule C-B must be completed for each Schedule B and submitted to the *authority having jurisdiction* after completion of the project but before the *authority having jurisdiction* issues an occupancy permit or makes a final inspection.

The Schedule C-B provides assurance that the *registered professional of record* for that discipline has done what he or she undertook to do on the Schedule B, specifically:

- completed *field review* of the components under the respective Schedule B discipline
- provides assurance that the components initialled on Schedule B substantially comply in all material respects with
 - o the BCBC 2006 and other applicable enactments respecting safety, except for construction safety aspects, and
 - o with the *registered professional of record's* design (the plans and documents submitted in support of the building permit application).



See Chapter 5 “Roles and Responsibilities For Letters of Assurance” for further details on the responsibilities of *coordinating registered professionals* and *registered professionals of record* with respect to Schedule C-B.

See Chapter 12 “Application of Letters of Assurance to Phased Building Permits and Occupancies” for information on the acceptable use of Letters of Assurance when occupancy permits are sought for portions of building project.

What Letters of Assurance Are Not

The Schedules outlined above are the full extent of BCBC 2006 Letters of Assurance. Other types of accountability documents, including those provided by individual *authorities having jurisdiction* and commonly referred to as “Owner’s Undertaking Letters”; “Schedule D” or “Schedule E”; are **not** required under the BCBC 2006 and should not be confused with BCBC 2006 Letters of Assurance. Similarly, BCBC 2006 Letters of Assurance should not be confused with other accountability documents that may be employed between *registered professionals of record* and supporting registered professionals, or by *authorities having jurisdiction* on matters that are outside the scope of Section 2.2.7 in Part 2 of Division C of the BCBC 2006 (Refer to Chapter 4 in this Guide).

These additional accountability documents may include written commitments by *registered professionals* with respect to enhanced building envelope services, professional liability insurance, and structural concept review, as well as some standardized forms of written commitment for use between *registered professionals of record* and supporting registered professionals such as Schedules S-B and S-C prepared by AIBC and APEGBC for use by supporting *registered professionals*. These schedules, and guidance on their use, can be obtained from the AIBC or the APEGBC, the regulatory bodies for *registered professionals*.

These other forms of written commitment are not part of the BCBC 2006 requirements for Letters of Assurance, and are not addressed in this Guide. BCBC 2006 Letters of Assurance do not replace any third party monitoring activities (e.g., plan reviews and site inspections) that may be provided by *authorities having jurisdiction*.

THE COMMUNITY CHARTER AND OTHER MEANS OF ACHIEVING ACCOUNTABILITY

Authorities having jurisdiction are accorded specific powers with respect to building regulation under the *Local Government Act* and the *Community Charter*. (The *Local Government Act* and the *Community Charter* do not apply to the City of Vancouver. Refer to the *Vancouver Charter* for the City of Vancouver's building regulation authority).

The *Community Charter* and the *Local Government Act* authorize local governments to require means of accountability on specific matters that are not addressed within the BCBC 2006. Some local governments, on the basis of site conditions, complexity of developments, or aspects of developments, require by bylaw that applicants for building permits provide "certifications" (i.e. assurances) from *registered professionals* that plans submitted with a permit application comply with the BCBC 2006 or other applicable laws with respect to safety, except for construction safety.

Under the applicable legislation, local governments may also require the involvement of *registered professionals* in matters such as land subdivision, development permits and building permits. Local governments may require documentation (e.g. a geotechnical report) from qualified professionals using similar language and format to the BCBC 2006 Letters of Assurance. **The BCBC 2006 Letters of Assurance cannot be used for these purposes.**

BCBC 2006 Letters of Assurance only apply to projects, or components of projects, that fall within the scope of Section 2.2.7 in Part 2 of Division C of the BCBC 2006.

Questions regarding means of accountability that are outside the scope of BCBC 2006 Letters of Assurance should be directed to the relevant local government or the AIBC or the APEGBC.

ROLES AND RESPONSIBILITIES FOR LETTERS OF ASSURANCE

Key Players in Design and Field Review

Most building projects described in Section 2.2.7 in Part 2 of Division C involve more than one *registered professional* in more than one discipline, and often more than one *registered professional* within a single discipline. Each *registered professional* is responsible for the design and *field review* of the components of the plans and supporting documents prepared by them. These functional relationships are independent and do not necessarily indicate the business (i.e. contractual) relationships among the parties, which may vary.

The following diagrams provide an overview of the functional relationships among the three tiers of *registered professional* that may be retained on a given project:

- the *coordinating registered professional*
- the *registered professionals of record* for each discipline
- the supporting *registered professionals* who may be retained within each discipline

The *coordinating registered professional* is responsible for coordinating design and *field reviews* by all the various *registered professionals of record* retained on the project, and advising the constructor and the *registered professionals of record* that *field review* reports should be made available for examination by the *authority having jurisdiction* upon request, as required by Sentence 2.2.7.3. in Part 2 of Division C.

Guide to the Letters of Assurance in the BC Building Code 2006

The *registered professional of record* is responsible for the design and *field review* of the components of the plans and supporting documents prepared by them. The *registered professional of record* is also responsible for reviewing the shop drawings prepared under the direction of any supporting *registered professionals* within that discipline, and either performing the *field review* of those components or satisfying him or herself that the necessary *field reviews* have been performed by the supporting *registered professional*.

The *registered professionals of record* document their commitment to provide *field review*, and provide assurance that *field reviews* within their particular disciplines have been completed by submitting Letters of Assurance (Schedules B and C-B) to the *coordinating registered professional*.

Supporting *registered professionals* do not complete BCBC 2006 Letters of Assurance, but, at the discretion of the *registered professional of record*, may be required to provide the *registered professional of record* for that discipline with sealed design documents, *field review* reports or other appropriate documentation such as Schedules S-B and S-C showing that they have reviewed the work related to their design and have determined that it substantially complies with applicable Code requirements and their design.

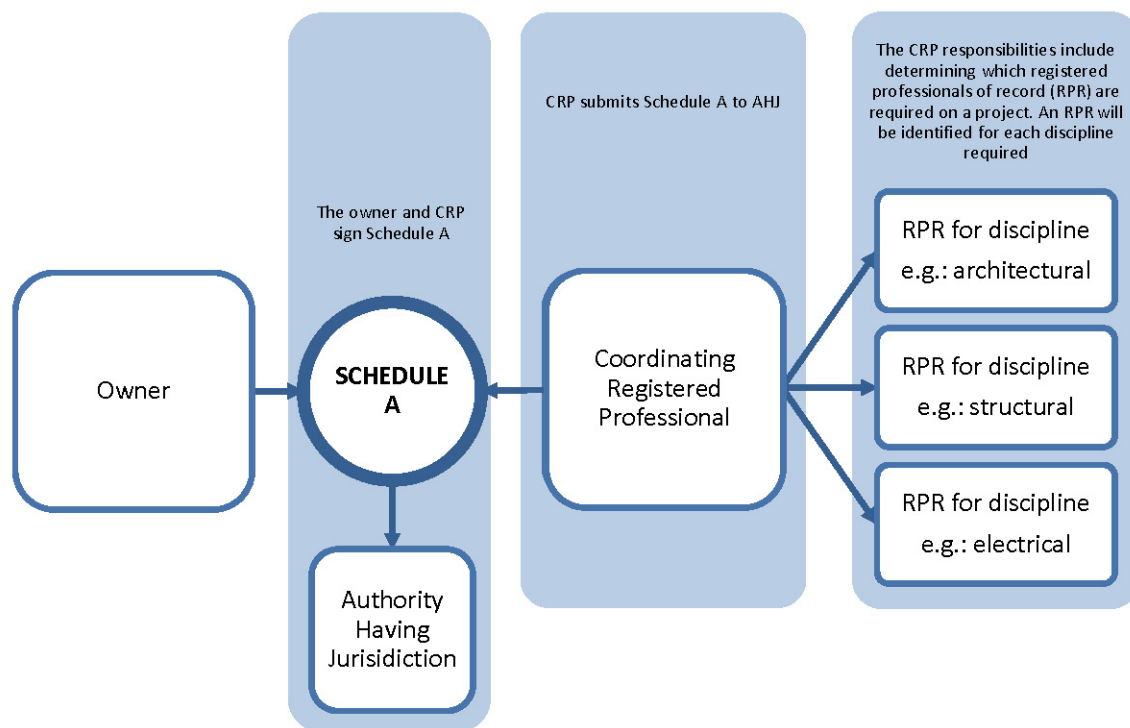
Schedules S-B and S-C have been developed cooperatively by the AIBC and the APEGBC for use by supporting *registered professionals*, and their use is strongly encouraged.

Field review is a defined term in the BCBC 2006 as follows:

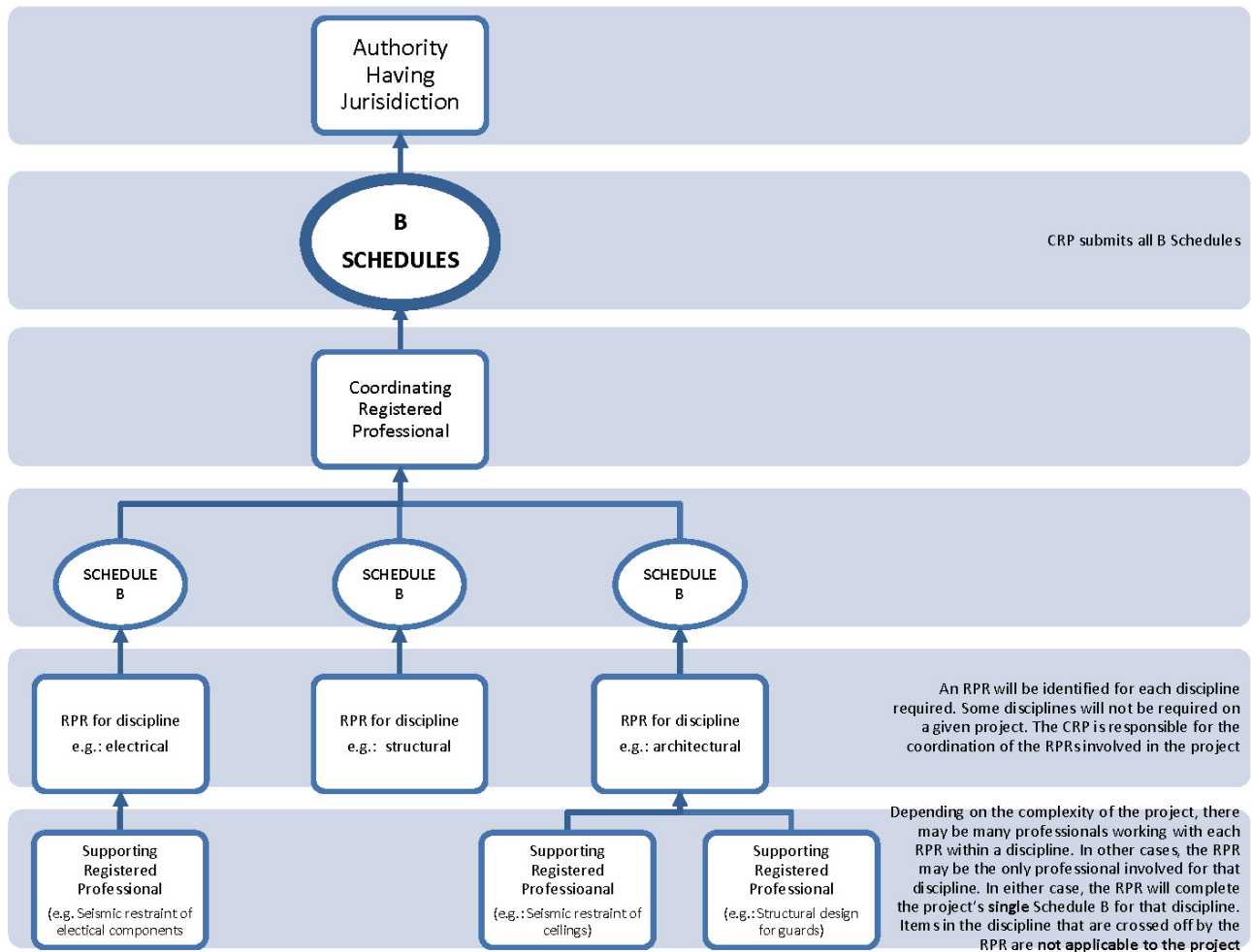
Field review means a review of the work

- (a) at a project site of a development to which a building permit relates, and
- (b) where applicable, at fabrication locations where building components are fabricated for use at the project site

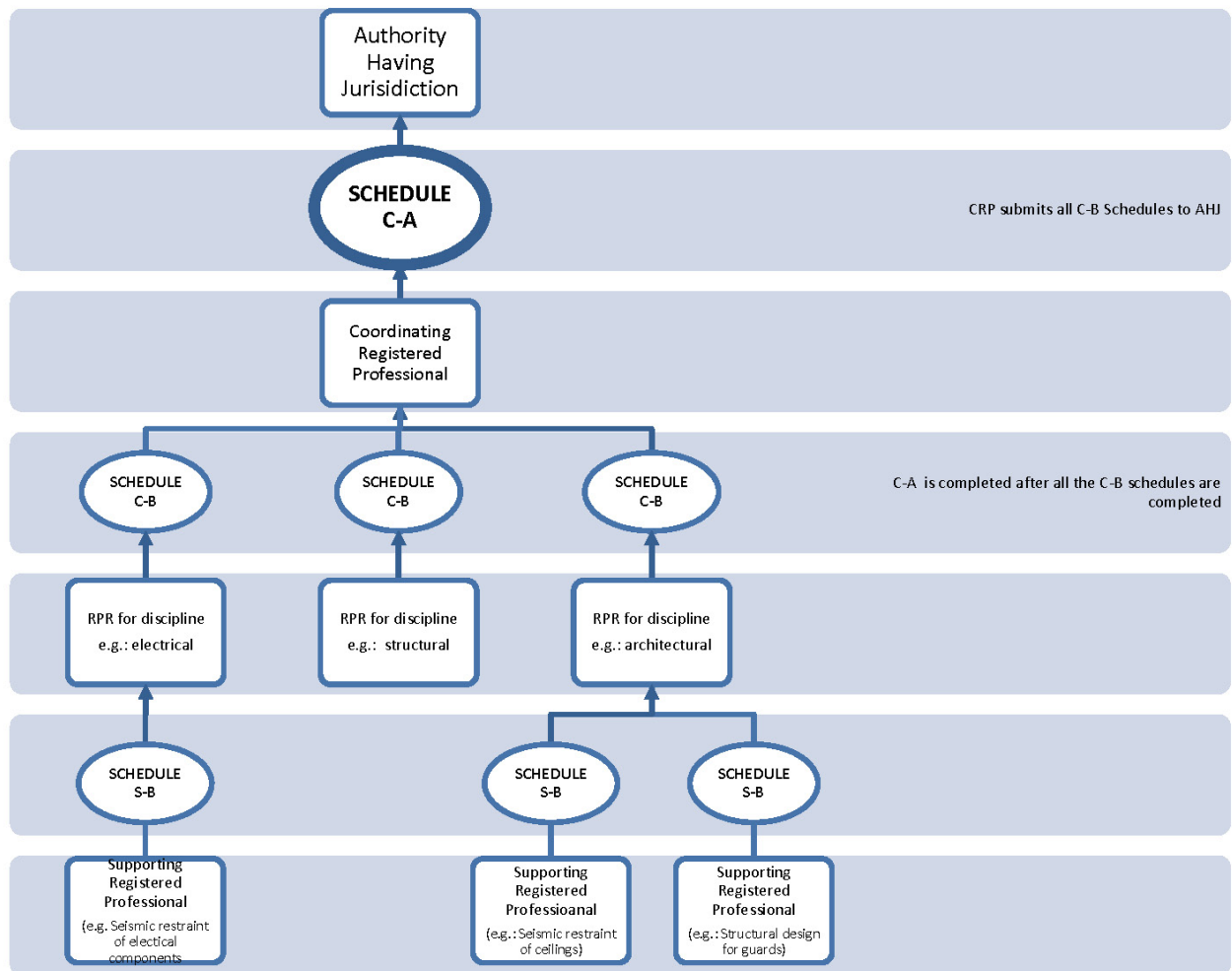
that a *registered professional* in his or her professional discretion considers necessary to ascertain whether the work substantially complies in all material respects with the plans and supporting documents prepared by the *registered professional* for which the *building permit* is issued.



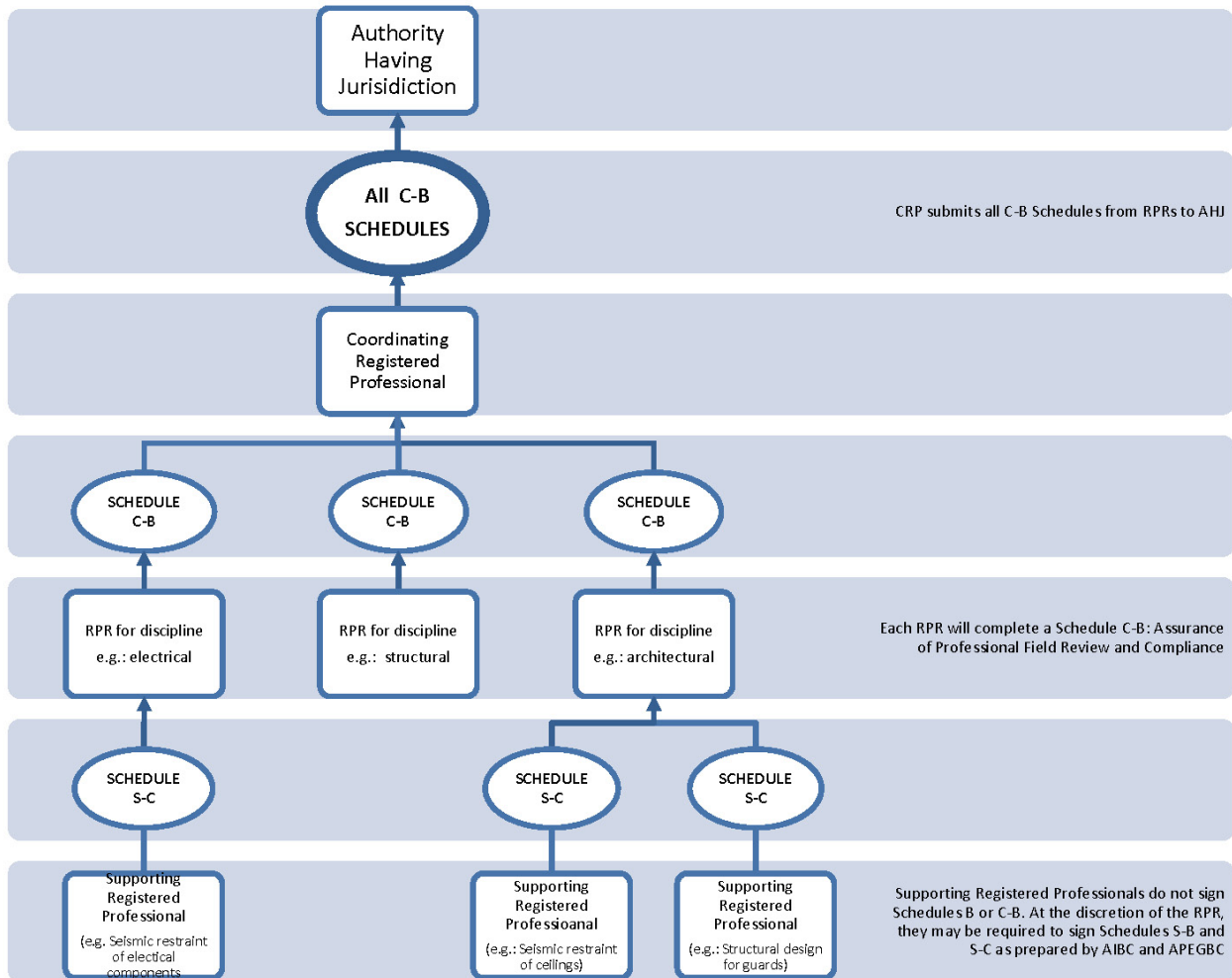
Schedule A: Functional Relationships



Schedule B: Functional Relationships



Schedule C-A: Functional Relationships



Schedule C-B: Functional Relationships

Owner Responsibilities

The term *owner* in the BCBC 2006 refers to the person, firm or corporation who controls the property under consideration during design and construction.

See Chapter 11 (“Application of Letters of Assurance to Building Alterations and Tenant Improvements”) for information on the tenant’s roles and responsibilities during tenant improvements.

Except as noted below, for any project that requires Letters of Assurance, the *owner* is responsible for retaining a *coordinating registered professional* and completing a Schedule A before issuance of a building permit.

- Some Part 9 buildings as described in Clause 2.2.7.1.(1)(c) may not require a *coordinating registered professional* if the extent of work is relatively simple and the designs of the various *registered professionals of record* have limited or no interaction,
- Renovations and tenant improvements may not require a *coordinating registered professional* if the work is relatively simple and the designs of the various *registered professionals of record* have limited or no interaction,
- A *registered professional of record* should review the project specific requirements with the *authority having jurisdiction* to determine if a *coordinating registered professional* is required for such projects.

By signing Schedule A, the *owner* confirms that he or she

- is either the *owner* of the property in question or is the authorized agent of the *owner*. An agent’s letter of appointment must be attached
- has retained the *coordinating registered professional* to coordinate the design work and *field reviews* of the project
- will notify the *authority having jurisdiction* immediately if that *coordinating registered professional* ceases to be retained on the project, even if the firm providing service to the *owner* does not change, and
- will ensure that work on the project ceases until another *coordinating registered professional* has been retained and a new Schedule A has been submitted

The *owner* is responsible for ensuring that the *authority having jurisdiction* receives all Schedules C-A and C-B after completion of the project and before the final inspection by the *authority having jurisdiction*, per Clause 2.2.7.2.(1)(b) in Part 2 of Division C. Typically, the *coordinating registered professional* collects all Schedules and submits them to the *authority having jurisdiction* on the *owner’s* behalf. If there is no *coordinating registered professional* then this is the *owner’s* obligation.

Coordinating Registered Professional Responsibilities

The *coordinating registered professional* is responsible for coordinating all *registered professionals of record* for the project in order to meet the objectives of the BCBC 2006, except for construction safety aspects. This coordination must be undertaken throughout the design, construction and occupancy phases. The *coordinating registered professional's* role is defined in Section 1.4.1.2 of Division A and is described in Division C Appendix A Clause A-2.2.7.2.(1)(a) and A-2.2.7.3.-3.2.1.

Generally, the *coordinating registered professional* is responsible for coordinating the work of each *registered professional of record*, and for the review and coordination of design documents prepared by the *registered professionals of record* throughout the term of the project. The *coordinating registered professional* is the contact point among the *authority having jurisdiction*, the *owner*, and each *registered professional of record*, and, as such, is responsible for facilitating communication among the various parties.

Registered professionals of record are responsible for their own design and *field review*.

It is the *coordinating registered professional's* responsibility to determine that all Letters of Assurance for the project are completed correctly. The *coordinating registered professional* submits the completed Letters of Assurance to the *authority having jurisdiction* on the *owner's* behalf.

By signing Schedule A, the *coordinating registered professional* confirms that he or she:

- will coordinate the design work and *field reviews* of all *registered professionals of record* retained for the project in order to ascertain that the design substantially complies with the BCBC 2006, except for construction safety aspects
- will notify the *authority having jurisdiction* immediately if he or she ceases to be retained on the project
- will provide the *authority having jurisdiction* with a Schedule B from each *registered professional of record* retained on the project
- will notify the *authority having jurisdiction* immediately if any *registered professional of record* ceases to be retained on the project, even if the firm employing the *registered professionals* is still on the project.

The *coordinating registered professional* is responsible for making sure that a *registered professional of record* for each discipline completes a Schedule B and a Schedule C-B at the appropriate times during the project. The *coordinating registered professional* must initial each of these Schedules, and submit them, on behalf of the *owner*, to the *authority having jurisdiction*.

By signing Schedule C-A at the end of the project, the *coordinating registered professional* confirms that he or she has:

- fulfilled his or her responsibilities for coordination of *field review* by all the *registered professionals of record*,
- fulfilled his or her responsibilities for coordination of the functional testing of fire protection and life safety systems (see A-2.7.7.3. in Appendix A of Division C - Section 1.0 for further details), and
- collected the appropriate Schedules C-B from the *registered professionals of record* to confirm that these systems substantially comply with both the BCBC 2006 and with the plans and supporting documents that were submitted with the building permit application



A-2.2.7.3.in Appendix A of Division C of the BCBC 2006 – Section 3.2.1 provides further guidance on the roles and responsibilities of the *coordinating registered professional*.

Registered Professional of Record and Supporting Registered Professional Responsibilities

The *registered professional of record* is the *registered professional* retained for the provision of the major part of the professional services within a particular discipline. The *registered professional of record* is also responsible for the review of the design documents prepared by any supporting registered professionals retained on the project within that discipline.

The *registered professional of record* for each discipline must complete a Schedule B at the time of building permit application. By signing Schedule B, the *registered professional of record*:

- Identifies the professional discipline (i.e., architectural, structural, mechanical, plumbing, fire suppression systems, electrical, or geotechnical) for which he or she is responsible (see A-2.2.7.3. of Appendix A of Division C – Section 3.0 for further details)
- Confirms that the designs that he or she has prepared substantially comply with the requirements of the BCBC 2006, except for construction safety aspects (see A-2.2.7.3. of Appendix A of Division C - Section 1.0 for further details)
- Confirms that he or she will take responsibility for the *field reviews* during construction within the respective discipline
- Confirms his or her responsibility for determining that *field reviews* have been undertaken on the work of any supporting *registered professionals* retained on the project within that discipline
- Commits to notifying the *authority having jurisdiction* immediately if he or she ceases to be retained on the project, even if the firm that retained that *registered professional* is still on the project

Except under special circumstances, only one Schedule B and Schedule C-B should be completed and submitted by one *registered professional of record* for each discipline.

An example of a case where two Schedules B and C-B may be appropriate is pre-engineered steel buildings, which often have one *registered professional of record* who designs the steel superstructure and a second *registered professional of record* who designs the concrete foundations.

A *registered professional of record* should only undertake design and field review for the items identified on the Letter of Assurance for their discipline based on their competency. As such, a *registered professional of record*, or Owner, may require supplementary supporting engineering or architectural services for a particular component, or sub-component, of a discipline. In instances where supporting engineering or architectural services are required, it is recommended that appropriate assurances be obtained by the relevant *registered professional of record* from the supporting *registered professional* (who could be engaged by the *registered professional of record*; the Owner; a contractor, sub-trade or supplier) providing the supporting design service and field review. Upon receipt of assurance from such supporting *registered professional* that a particular component or sub-component substantially complies, in all material respects, with the applicable requirements of the BCBC 2006, the *registered professional of record* can confidently complete and submit the Letter of Assurance for his or her discipline. This allows the integrity of the BCBC 2006 scheme for Letter of Assurance to be maintained (one Letter of Assurance per discipline).

A-2.2.7.2.(1)(b) in Appendix A of Division C of the BCBC 2006, provides further guidance on the roles and responsibilities of *registered professionals of record*.

Authority Having Jurisdiction Responsibilities

The *authority having jurisdiction* receives signed and sealed Letters of Assurance from the *coordinating registered professional* at the appropriate times during the building project. Although, in the first instance, the *coordinating registered professional* is responsible for delivering the Letters of Assurance appropriately and correctly completed, the *authority having jurisdiction* should confirm that they have been completed properly—i.e., that no information is missing; items have not been struck out unless they do not apply to the project; and that they do not contain inappropriate notations or qualifications, such as 'interim', 'partial', with 'expiration dates' or noting of deficiencies (refer to Chapter 12 of this Guide for appropriate annotations for phased building permits or phased occupancies).

An *authority having jurisdiction* must not request or accept BCBC 2006 Letters of Assurance on projects that are outside the scope of Section 2.2.7. in Part 2 of Division C

HOW TO COMPLETE AND SUBMIT LETTERS OF ASSURANCE

Letters of Assurance are legal documents, and as such, carry legal implications for the *owners* and *registered professionals* who complete them. The Letters of Assurance and this Guide were developed in close consultation with the Union of BC Municipalities, the Building Officials' Association of BC, the Architectural Institute of BC and the Association of Professional Engineers and Geoscientists of BC, to confirm appropriate accountability in protecting public safety while not imposing inappropriate risks or liabilities on the *registered professionals* who submit them. The precise wording of the Schedules is critical. **BCBC 2006 Letters of Assurance must not be altered or used for purposes for which they are not intended.**

Each Schedule contains precise instructions for its completion. Schedules must be completed according to these instructions.

Registered professionals of record completing Schedule B may cross off and initial any items that do not apply to **that project**. For example, a registered professional of record could cross off 'elevators' on a project which does not have any elevators.

An item must not be crossed off if it applies to the project. A *registered professional of record* will have to submit a Schedule B and C-B to accept responsibility for each item applicable to the project. No other items on Letters of Assurance may be crossed off, and their language must not be altered or qualified in any way, except as noted below:

- Refer to Chapter 7 of this Guide for alterations that may be appropriate when there are changes to the *coordinating registered professional* or *registered professional of record*,
- Refer to Chapter 9 of this Guide for alterations that may be appropriate to identify the applicable portions of Part 9 buildings,
- Refer to Chapter 11 of this Guide for alterations that may be appropriate to identify the applicable portions of a building for alterations or tenant improvements to existing buildings,
- Refer to Chapter 12 of this Guide for qualifications that are acceptable for phased building permits and phased occupancies.

Letters of Assurance must be submitted to the *authority having jurisdiction* by the *coordinating registered professional* in accordance with note (i) at the top of each Letter of Assurance (i.e. prior to commencement of construction activities of the components identified in Schedule B). In jurisdictions that issue building permits, Letters of Assurance are generally submitted prior to issuance of the building permit.

One example of an exception to the submission of Schedule B prior to building permit issuance is the detailed design of fire suppression systems. Refer to Division C Appendix A Article A-2.2.7.3. – 3.2.4. for the appropriate options for submission of Schedule B for fire suppression systems.

In such cases, the *coordinating registered professional* must obtain a Schedule B from this *registered professional of record* and submit it to the *authority having jurisdiction* as soon as this *registered professional of record* has completed the necessary plans and supporting documents. The *coordinating registered professional* will also coordinate the design by this *registered professional of record* with the other disciplines.

DEALING WITH CHANGES IN REGISTERED PROFESSIONALS OF RECORD AFTER A BUILDING PERMIT IS ISSUED

When An Additional Registered Professional Becomes Involved

The *coordinating registered professional* must immediately advise the *owner* and the *authority having jurisdiction* if a new *registered professional of record* becomes involved in a project after the building permit has been issued. For example, if a fire suppression system was initially believed to be unnecessary and the project received a permit as such, but was later determined to be required.

If a new *registered professional of record* is retained by the *owner* after the building permit is issued, the *coordinating registered professional* will obtain plans and supporting documents, including a completed Schedule B, from the new *registered professional of record*, and submit them to the *authority having jurisdiction* on the *owner's* behalf.

If the additional *registered professional* is a supporting *registered professional* within a discipline, he or she does not complete Letters of Assurance. Rather, the *registered professional of record* for that discipline shall obtain appropriate alternate documentation from the new supporting *registered professional* specifying his or her design and *field review* responsibilities (e.g. Schedules S-B and S-C prepared by AIBC and APEGBC). The *registered professional of record* must keep this documentation available for the *coordinating registered professional* and the *authority having jurisdiction* to review upon request.

When There is a Change of Coordinating Registered Professional or Registered Professional of Record During Construction

The Letters of Assurance were developed on the basis that the *coordinating registered professional* and *registered professionals of record* would maintain their involvement throughout the entire design and field review process. It was contemplated that the *coordinating registered professional* who signed the Schedule A would be the same *coordinating registered professional* who signed the Schedule C-A. It was also contemplated that the *registered professional of record* who signed a Schedule B would be the same *registered professional of record* who signed the Schedule C-B for that discipline. In order to maintain clear allocations of responsibility and to avoid coordination and accountability gaps, this is the preferred approach for all projects.

There may be rare circumstances where this approach cannot be implemented due to a variety of causes. For example:

- The original *coordinating registered professional* or *registered professional of record* is no longer available due to his or her retirement, illness or death
- The original *coordinating registered professional* or *registered professional of record* is no longer available as due to significant geographic relocation
- The professional services contract with the original *coordinating registered professional* or *registered professional of record* is terminated
- The original *coordinating registered professional* or *registered professional of record* transfers to a different firm and the owner maintains the professional services contract with the original firm. This original firm must then assign a new (incoming) *coordinating registered professional* or *registered professional of record* to continue with the coordination or field review services. The old (outgoing) *coordinating registered professional* or *registered professional of record* remains responsible for the services he or she provided up to the date of their departure. The incoming *coordinating registered professional* or *registered professional of record* takes responsibility for the services starting on the date of his or her retention. The incoming *coordinating registered professional* or *registered professional of record* must provide a new Schedule A or B effective on the date of his or her retention.

If any one of the above examples or a similar circumstance occurs, Article 2.2.7.4. in Part 2 of Division C requires that work on the project site must stop, and before work can resume:

- the owner and the outgoing *coordinating registered professional* must both *notify the authority having jurisdiction in writing, clarifying and documenting the transition of responsibilities to the incoming coordinating registered professional or*
- *the coordinating registered professional and the registered professional of record* must both notify the *authority having jurisdiction in writing, clarifying and documenting the transition of responsibilities of the outgoing registered professional of record to the incoming registered professional of record.*

In some of the circumstances noted above, the outgoing *coordinating registered professional* or *registered professional of record* may remain available for consultation with the incoming *coordinating registered professional* or *registered professional of record*. In this case, the continuity of information flow is maintained and there is less likelihood of any accountability gaps in the project. This is the preferred approach to dealing with changes of the *coordinating registered professional* or *registered professional of record* during construction.

On the other hand, there will be circumstances where the outgoing *coordinating registered professional* or *registered professional of record* is not available for consultation with the incoming *coordinating registered professional* or *registered professional of record*. In this case, it is much more challenging to address the division of responsibilities between the outgoing and incoming *coordinating registered professional* or *registered professional of record*.

Each project will have unique requirements depending upon the circumstances of the change in personnel. The incoming *coordinating registered professional* or *registered professional of record* should consult with the *authority having jurisdiction* to determine the appropriate course of action with respect to the submission of the additional Schedules A, B, C-A and/or C-B.

Allocation of Responsibilities

The following principles will be used to determine the appropriate allocation of responsibilities between the outgoing and incoming *coordinating registered professional* or *registered professional of record*, and the appropriate annotations on the additional Schedules A, B, C-A and C-B:

Responsibilities of the outgoing coordinating registered professional or registered professional of record

The outgoing *coordinating registered professional* or *registered professional of record*:

- Cannot retract the design compliance assurances in his or her Schedules A or B that were previously submitted
- Retains responsibility for all of the field review obligations in his or her Schedule A or B until the date of termination
- Except when not possible due to death or incapacity, will provide the incoming *coordinating registered professional* or *registered professional of record* with all of the completed field review reports and other relevant documents (see Sentence 2.2.7.3.(2) in Part 2 of Division C of the BCBC)
- Except when not possible due to death or incapacity, will provide a letter to the *authority having jurisdiction* confirming that he or she has fulfilled the obligations described in their Schedule A or B from the start of construction to the date of termination
- Will not provide a Schedule C-A or C-B

Responsibilities of the incoming *coordinating registered professional*

- Although the incoming *coordinating registered professional* is not responsible for the work done by the outgoing *coordinating registered professional*, he or she shall review the relevant documents provided by the outgoing *coordinating registered professional* to ascertain the extent of coordination of design and field review that has been provided to date.
- If the incoming *coordinating registered professional* determines that the documentation and/or coordination from the outgoing *coordinating registered professional* is inadequate, he or she should discuss with the *authority having jurisdiction* the proposed course of action to address the inadequacy.
- If it is not possible to obtain the above-mentioned letter and other relevant documents from the outgoing *coordinating registered professional* (e.g. due to death, illness or other legitimate cause), the incoming *coordinating registered professional* should discuss with the *authority having jurisdiction* the proposed course of action for the transfer of responsibilities.
- The incoming *coordinating registered professional* must provide the *authority having jurisdiction* with a new Schedule A by crossing off and initialling the word “design” and replace it with the words “design changes during construction”. The date that is applied to this new Schedule A represents the date when his or her role as a *coordinating registered professional* commenced.
- Ideally, the start date of the incoming *coordinating registered professional* should match the termination date of the original *coordinating registered professional*. In the event that there is a gap between these two dates, the incoming *coordinating registered professional* should discuss with the *authority having jurisdiction* the appropriate course of action, which may vary depending upon the length of the gap and the activities on the project site during such gap.
- Upon completion of the project, the incoming *coordinating registered professional* must provide a Schedule C-A to the *authority having jurisdiction*.

Since the Schedule C-A from the incoming *coordinating registered professional* confirms that he or she has fulfilled the obligations described in his or her Schedule A, the submission of the Schedule C-A to the *authority having jurisdiction* covers all coordination of field review that was undertaken after the date which is indicated on the Schedule A. The only modification necessary to the incoming coordinating registered professional's Schedule C-A is to replace the word ‘the’ with the word ‘my’ in the following phrase:

- (a) I have fulfilled my obligations for coordination of *field review* of the *registered professionals* required for the project as outlined in Subsection 2.2.7, Division C of the British Columbia Building Code and in ~~the~~ **my** previously submitted Schedule A, “CONFIRMATION OF COMMITMENT BY OWNER AND BY COORDINATING REGISTERED PROFESSIONAL,”

Responsibility of the incoming *registered professional of record*

Although the incoming *registered professional of record* cannot be responsible for the work done by the outgoing *registered professional of record*, the incoming *registered professional of record* is expected to:

- Review the plans and supporting documents, including field review reports, provided by the outgoing *registered professional of record* to ascertain the extent to which the outgoing *registered professional of record* has fulfilled the obligations in his or her Schedule B to date.
- Conduct an initial review of the project site to determine if there are any substantial code deficiencies in the work to date and to recommend the appropriate remedial actions. The incoming *registered professional of record* cannot take responsibility for concealed elements in the construction.
- If the incoming *registered professional of record* determines that the documentation from the outgoing *registered professional of record* is inadequate, or there are a significant number of code deficiencies in the work to date, he or she should discuss with the *authority having jurisdiction* the appropriate course of action. Depending upon the severity of the concerns, there may be a need for an audit of the construction to date, which may include non-destructive or destructive testing, removal of building components to expose hidden construction, or other actions at the discretion of the incoming *registered professional of record* in consultation with the *authority having jurisdiction*.
- If it is not possible to obtain the letter from the outgoing *registered professional of record*, field review reports and other relevant documents from the outgoing *registered professional of record* (e.g. due to death, illness or other legitimate cause), the incoming *registered professional of record* should discuss with the *authority having jurisdiction* the appropriate course of action for the transfer of responsibilities.
- The incoming *registered professional of record* must provide the *authority having jurisdiction* with a new Schedule B by crossing off and initialling the word “design” and replacing it with the words “design changes during construction”. The date that is applied to this new Schedule B represents the date when his or her role as a *registered professional of record* commenced.
- Ideally, the commencement date of the incoming *registered professional of record* should match the termination date of the outgoing *registered professional of record*. In the event that there is a gap between these two dates, the incoming *registered professional of record* should discuss with the *authority having jurisdiction* the appropriate course of action, which may vary depending upon the length of the gap and the activities on the project site during such gap.
- Upon completion of the project, the incoming *registered professional of record* must provide a Schedule C-B to the *authority having jurisdiction*.

Since the Schedule C-B from the incoming *registered professional of record* confirms that he or she has fulfilled the obligations described in Schedule B, the submission of the Schedule C-B to the *authority having jurisdiction* covers all field reviews that were undertaken after the date which is indicated on the Schedule B. The only modification necessary to the incoming coordinating registered professional's Schedule C-B is to replace the word ‘the’ with the word ‘my’ in the following phrase:

- (a) I have fulfilled my obligations for *field review* as outlined in Subsection 2.2.7, Division C of the British Columbia Building Code and in ~~the~~ **my** previously submitted Schedule B, “ASSURANCE OF PROFESSIONAL DESIGN AND COMMITMENT FOR FIELD REVIEW”,

Change of supporting registered professional during construction

The same principles and processes apply to changes of supporting registered professionals during the course of the project, except that supporting registered professionals within a discipline do not complete Letters of Assurance, and their changes are not of concern to *authorities having jurisdiction*. It will be the responsibility of the relevant *registered professional of record* to see that the same process is followed when there is a change of a supporting registered professional.

DESIGN AND FIELD REVIEW CONDUCTED BY DIFFERENT REGISTERED PROFESSIONALS OF RECORD

The Letters of Assurance are based on the preferred and most common concept that there is a single *registered professional of record* within each discipline who is responsible for both the design and *field review* associated with that discipline. The division of responsibilities for design and *field review* to two separate *registered professionals of record* is undesirable and should be avoided. However, there are instances, where a single, continuing *registered professional of record within a discipline* may not be possible, and design and *field review* are performed by different *registered professionals of record*. The *field review registered professional of record* may or may not be from within the same firm as the design *registered professional of record*. In either case, the Letters of Assurance must be amended to reflect these two different *registered professionals of record*.

The design *registered professional of record* maintains responsibility for substantial code compliance of the original design and possibly any changes to the design during construction. The *field review registered professional of record* takes on the responsibility for *field reviews* during construction and possibly substantial code compliance of any design changes during construction.

Since the purpose of *field review* is to confirm that the construction substantially complies with the BCBC and the submitted plans and supporting documents, it is imperative that close coordination and communication exist between the design *registered professional of record* and the *field review registered professional of record*.

The design *registered professional of record* must amend his or her Schedule B as follows:

- cross off and initial "Commitment for Field Review" from the title on page 1,
- cross off and initial the last 2 lines on page 1 regarding field review,
- cross off and initial the top 2 lines on page 2 regarding notification to the *authority having jurisdiction*,
- cross off and initial "and Field Review" from the title on page 3.

The *field review registered professional of record* must amend his or her Schedule B as follows:

- if the *field review registered professional of record* is taking responsibility for design changes during construction, revise the word "design" throughout to read "design changes during construction".
- if the *field review registered professional of record* is not taking responsibility for design changes during construction and this responsibility remains with the design *registered professional of record*, amend his or her Schedule B as follows:
 - o cross off and initial "Assurance of Professional Design and" from the title on page 1,
 - o cross off and initial all but the last 2 lines on page 1 regarding design,
 - o cross off and initial "Design and" from the title on page 3.

Guide to the Letters of Assurance in the BC Building Code 2006

In either case, the design *registered professional of record* is not required to submit a Schedule C-B. If the design registered professional of record is taking responsibility for design changes during construction, then his or her original Schedule B covers the substantial code compliance of such design changes.

The *field review registered professional of record* need not make any annotations on his or her Schedule C-B since the wording of Schedule C-B refers back to the commitments in Schedule B (i.e. the substantial code compliance only relates to the design changes during construction, if that work is included in the scope).

The *coordinating registered professional* is responsible for coordinating the design and *field review* by the *registered professionals of record* and for verifying that the Letters of Assurance are appropriately annotated to suit the project specific requirements.

APPLICATION OF LETTERS OF ASSURANCE TO PART 9 BUILDINGS

Letters of Assurance are generally not intended to apply to Part 9 *buildings*. Only those Part 9 *buildings* or their components that fall within the scope of Section 2.2.7. in Part 2 of Division C are subject to Letters of Assurance.

For example, Letters of Assurance are required for a structural component (in a Part 9 *building*) that falls within the scope of Part 4 of Division B. Letters of Assurance are required for that structural component only. Beams with point loads, girder trusses, trusses with spans greater than 12.2 meters and proprietary engineered products are some examples of structural components that may exceed the scope of Part 9 of Division B and will require a *registered professional* to assume responsibility for the substantial code compliance of such components.

If a Part 9 *building* contains numerous Part 4 components, many *authorities having jurisdiction* require that the scope of the letter of assurance include the integrated structural design and field review for the entire building. The *registered professional of record* should review with the *authority having jurisdiction* the local requirements for such circumstances.

Factory-Built Roof Trusses

Factory-built roof trusses that are designed under Article 9.23.13.11 in Part 9 of Division B of the BCBC 2006 do not require Letters of Assurance from the truss designer. However, in some cases *authorities having jurisdiction* request a written commitment from a *registered professional* that the girder reactions and loads are satisfactory. These written commitments are not required under the BCBC 2006, and must not take the form of BCBC 2006 Letters of Assurance.

Factory-built roof trusses that do not fall within the limits defined in Article 9.23.13.11. in Part 9 of Division B are within the scope of Part 4 of Division B and do require Letters of Assurance.

Guide to the Letters of Assurance in the BC Building Code 2006

Beams

Uniformly loaded steel beams and glued-laminated floor beams which can be sized from Table 9.23.4.3 and Table A-11 in Part 9 of Division B, Appendix A respectively do not require Letters of Assurance from the beam designer. In some cases, *authorities having jurisdiction* request a written commitment from a *registered professional* that the beams have been designed according to Tables 9.23.4.3 and A-11. These written commitments are not required under the BCBC 2006, and must not take the form of BCBC 2006 Letters of Assurance.

Beams with non-uniform or concentrated loads fall within the scope of Part 4 of Division B and require Letters of Assurance.

Alterations

Alterations to Part 9 *buildings*, particularly to commercial *buildings* that are subject to changes of use or occupancy, may sometimes trigger the need for Letters of Assurance. More information on the possible implications of building *alterations* is provided in Chapter 11 “Application of Letters of Assurance to Building Alterations and Tenant Improvements”.

APPLICATION OF LETTERS OF ASSURANCE TO GEOTECHNICAL COMPONENTS

For Part 3 buildings, a subsurface investigation by a *registered professional of record* is mandated by Sentence 4.2.2.1.(1) in Part 4 of Division B. The *coordinating registered professional* will submit to the *authority having jurisdiction* a Schedule B from the *registered professional of record* for the geotechnical discipline at the time of building permit application. Due to the variable nature of geotechnical conditions, the geotechnical design will be based upon the subsurface investigation, however, during *field review* the geotechnical design may have to be altered to suit the site conditions found during *field reviews*.

For Part 9 buildings, in accordance with Sub-clause 2.2.7.1.(1)(c)(ii) in Part 2 of Division C, a subsurface investigation by a *registered professional of record* is only required when the geotechnical conditions at the building site fall outside the scope of Part 9 in Division B. This could include any of the following conditions:

- the allowable bearing pressure is less than 75 kPa
- *foundations* that are supported on compacted fill that exceeds 300 mm in thickness
- *foundations* that are supported on permafrost
- *foundations* that may be subject to slope instability
- underpinning
- *deep foundations*
- *foundation walls* that exceed the criteria of Subsection 9.15.4. in Part 9 of Division B, or
- retaining walls, other than *foundation walls*, that are subject to lateral earth pressure, where the retained height exceeds 1.5 m

Due to the variable nature of geotechnical conditions, the conditions noted above for Part 9 buildings may not become apparent until after the excavation has commenced. In such a case, the owner must retain a *registered professional of record* for the geotechnical discipline to undertake subsurface investigation, provide geotechnical design and submit a Schedule B to the *authority having jurisdiction* upon completion of his or her design. The geotechnical *registered professional of record* may cross off the items on Schedule B that are not applicable to the project. The geotechnical *registered professional of record* will conduct *field reviews* during construction and submit a Schedule C-B to the owner for submission to the *authority having jurisdiction* prior to occupancy.

APPLICATION OF LETTERS OF ASSURANCE TO BUILDING ALTERATIONS AND TENANT IMPROVEMENTS

While it is difficult to make definitive statements about when the Letters of Assurance are required for alterations to existing buildings, BCBC 2006 requirements for Letters of Assurance are not intended to apply to simple building *alterations* or simple tenant improvements. Only when a building *alteration* or tenant improvement falls within the scope of Section 2.2.7 in Part 2 of Division C are Letters of Assurance required.

Simple building *alterations* that meet all of the following criteria typically do not require Letters of Assurance:

- no significant construction is involved
- the improvements involve no structural, mechanical or electrical components that require the retention of a *registered professional* under the BCBC 2006
- the improvements involve no fire and life safety components or any access requirements for persons with disabilities

Letters of Assurance are typically required for:

- Situations when any of the three above noted conditions are present
- *Alterations*, including tenant improvements, to Part 3 buildings that involve changes to *fire separations*, or significant changes to egress systems
- *Alterations*, including tenant improvements, to Part 9 buildings that involve components that fall outside the scope of Part 9 of the BCBC 2006 as described in Clause 2.2.7.1.(2)(c) in Part 2 of Division C

Building *alterations* or tenant improvements that are associated with a “change in use or *occupancy*”, such as *alterations* to a Part 3 *building*, or change in use or occupancy to a Part 9 building which will make it a Part 3 building, might trigger significant BCBC 2006 requirements not only for the *alteration* itself but also for the upgrading of the base *building*. This should be determined at the earliest opportunity in consultation with the *authority having jurisdiction* and will require Letters of Assurance from a *coordinating registered professional* and from each *registered professional of record*.

For the purposes of tenant improvements, the tenant is the appropriate entity to sign the Schedule A, rather than the property owner as per the records of the Land Title Office. Some *authorities having jurisdiction* may require additional accountability documentation from the property owner with respect to tenant improvement works (e.g. Owner’s Undertaking Letter).

By signing and sealing a Letter of Assurance with respect to a building *alteration* or tenant improvement, a *registered professional* is providing assurance that for their discipline the *alteration* substantially complies with the BCBC 2006, and has not created non-conformity or substantially increased the level of non-conformity of the existing *building*.

It is fairly common for tenant improvement work to be underway at the same time that the base building is still under construction (e.g. shopping malls). Very often the tenant improvement *registered professionals of record* and constructors are different from the base building *registered professionals of record* and constructors. If the tenant improvement work commences prior to completion of the base building shell, there can be many complications with overlapping responsibilities between the base building and tenant improvement *registered professionals of record* and constructors. The *coordinating registered professional* should discuss with the owner, the tenants and the *authority having jurisdiction* the most appropriate method for undertaking the tenant improvement work to minimize confusion with respect to the responsibilities of the different *registered professionals of record*.

APPLICATION OF LETTERS OF ASSURANCE TO PHASED BUILDING PERMITS AND PHASED OCCUPANCIES

Acceptable Use of Letters of Assurance for Phased Building Permits

Some *authorities having jurisdiction* allow phased building permit applications in order to accommodate fast-tracked projects (e.g. excavation and shoring phase, foundation phase, full building permit phase). In this instance the design of the full project may not be complete at the time of building permit application for the initial phases.

Since Schedule B refers to “plans and supporting documents prepared by this *registered professional of record*”, it is appropriate that Schedules B only be submitted to the *authority having jurisdiction* once the plans and supporting documents are complete.

For example, for an excavation and shoring phase, the only Letters of Assurance that should be submitted for the building permit would be the Schedule A from the *owner* and *coordinating registered professional*, and the Schedule B from the *registered professional of record* for the geotechnical discipline.

For a subsequent foundation permit phase, the only additional Letter of Assurance that should be submitted for the building permit is the Schedule B from the *registered professional of record* for the structural discipline. This Schedule B should be clearly annotated “For Foundations Only”, since the only plans and supporting documents that accompany this permit application are the structural foundation drawings.

For the subsequent full building permit, the *registered professional of record* for the structural discipline will submit another Schedule B with no annotations.

The *coordinating registered professional* should review with the *authority having jurisdiction* the appropriate procedures for phased building permit applications. Some *authorities having jurisdiction* require the submission of plans and supporting documents for the entire project before considering the issuance of phased building permits. There is some risk associated with proceeding with pouring concrete foundations prior to having a complete set of plans and supporting documents and Letters of Assurance from all disciplines that demonstrate substantial code compliance for the entire project.

Acceptable Use of Letters of Assurance for Phased Occupancy

Phased, or partial, occupancy sometimes occurs when a discrete or stand-alone portion of a *building* or project has been completed with respect to the drawings and supporting documents that were submitted in support of the building permit application.

Owners, coordinating registered professionals and authorities having jurisdiction need to discuss the potential for project occupancy phasing early in the design process to ensure that the *coordinating registered professional* and *registered professionals of record* will be able to issue Schedules C-A and C-B for discrete or stand-alone portions of the project.

There are two possible approaches regarding building permits to accommodate phased occupancies:

- If the discrete portions of the project for which phased occupancies are known at the building permit application stage, then the *authority having jurisdiction* could issue discrete building permits for each portion of the project to match the phased occupancies. The *coordinating registered professional* and *registered professionals of record* could then provide separate Schedules A, B, C-A and C-B for each discrete portion of the project. In this case the Schedules would not require any amendments.
- If the discrete portions of the project are not known at the building permit application stage, and a single building permit is issued for the entire project, then the Schedules C-A and C-B could be amended to clearly identify the portion of the project that is to be included in the phased occupancy.

For this second approach, if phased or partial occupancy is sought for portions of a project under a single building permit, Schedules C-A and C-B may only be issued where:

- the segment of the project for which occupancy is sought is clearly defined in the 'Address of Project' section of the Schedules C-A and C-B,
- the work for the segment of the project for which occupancy is sought substantially complies in all material respects with the BCBC 2006 and with the drawings and supporting documents that were submitted in support of the building permit application,
- the segment of the project for which occupancy is sought has complete and inherent integrity with respect to fire and life safety, and
- any project segments that are excluded from the Schedules C-A and C-B are clearly protected from premature use and will have no adverse effect on the safe occupancy of the completed segment of the project

Once all work on the project has been completed and before the final occupancy permit is issued, final Schedules C-A and C-B must be submitted, with no annotations, covering the entire project to which the single building permit applied.

Unacceptable Use of Letters of Assurance for Phased Occupancy

Letters of Assurance must not be issued for any segment of a project that does not substantially comply with Code requirements or with the drawings and supporting documents that were submitted in support of the building permit application. **If deficiencies remain, the Letters of Assurance should not be issued.** Deficiencies under a construction contract are not necessarily deficiencies with respect to compliance with BCBC 2006.

APPLICATION OF LETTERS OF ASSURANCE TO PART 10 REQUIREMENTS

The successful application of Part 10 of Division B energy and water efficiency requirements will mean that a range of professionals will have accountability for design, *field review* and testing

Ongoing coordination between the *coordinating registered professional* and the *registered professionals of record* will be necessary. The Letters of Assurance which took effect on September 1, 2010 are worded to explicitly reference these new Part 10 provisions. *Registered professionals of record* must indicate that the *building* accommodates these new Part 10 of Division B requirements, just as any other Part of the Code.

1. APPLICATION OF LETTERS OF ASSURANCE TO CIVIL WORKS

Schedule B does not include a specific discipline for civil works within private property. Since some projects have a separate *registered professional* who undertakes the design and field review of civil works, this Chapter of the Guide will outline the appropriate approach for the use of Letters of Assurance for civil works.

Roadways, sidewalks, fire access routes

Since the item “Provisions for firefighting access” is included in item 1.9 of Schedule B under the architectural discipline, if the design and field review of such components is undertaken by a civil *registered professional*, this *registered professional* will be considered to be a supporting *registered professional* to the architectural *registered professional of record*. For these components the civil *registered professional* should provide a Schedule S-B and S-C to the architectural *registered professional of record*.

Civil plumbing systems for on-site services

For some projects, the plumbing *registered professional of record* provides the design and field review of plumbing systems within the building, and a separate civil *registered professional of record* provides the design and field review of on-site services that extend from the property line to the building. The on-site services could include such items as sanitary piping, storm piping, drainage piping for site retaining walls, fire suppression water supply piping, domestic water supply piping and fire hydrants on private property. Plumbing systems that are located on private property are subject to the requirements of Part 7 in Division B of the BCBC. If a separate civil *registered professional of record* provides design and field review services for such on-site plumbing systems, then such work is considered to be a primary discipline, and the civil *registered professional of record* should submit Schedules B and C-B for the relevant items in Schedule B.

Guide to the Letters of Assurance in the BC Building Code 2006

Although Chapter 5 of this Guide states “Except under special circumstances, only one Schedule B and Schedule C-B should be completed and submitted by one *registered professional of record* for each discipline”, Civil plumbing works for on-site services are an exception to this rule.

Since Schedule B states that the RPR “gives assurance that the design of the components of the plans and supporting documents prepared by this *registered professional of record*” substantially comply with the BCBC, by signing a Schedule B, the civil RPR is only taking responsibility for the work that is indicated on his or her drawings. This provides a clear delineation of the scope of services between the plumbing *registered professional of record* and the civil *registered professional of record*.

It is appropriate for the civil *registered professional of record* to cross off and initial those items on Schedule B that do not apply to his or her scope.

The following items may be included in the civil *registered professional of record* list for civil works:

Component	Appropriate Item on Schedule B
Storm water piping	4.2 Site and foundation drainage systems services
Drainage for site retaining walls	4.2 Site and foundation drainage systems services
Sanitary piping	4.2 Site and foundation drainage systems services
Domestic water piping	4.2 Site and foundation drainage systems services
Fire suppression water piping	4.2 Site and foundation drainage systems services
Fire hydrants on private property	4.2 Site and foundation drainage systems services

All other items on Schedule B should be crossed off and initialed.

Some plumbing services may be located on private property, but may not be subject to the requirements of Part 7 in Division B of the BCBC (e.g. site services located under private roadways in a new subdivision). Such installations are commonly designed to the requirements of the local jurisdiction's municipal servicing Bylaw and are not subject to Part 7 of Division B of the BCBC or to Letters of Assurance.

Off-site Civil Works

The BCBC only applies to work within a building, or work located on private property to service a building. Off-site civil works is not regulated by the BCBC, so Letters of Assurance do not apply.

2. ANCHORAGE AND SEISMIC RESTRAINT

Schedule B includes a requirement for anchorage and seismic restraint of non-structural elements in buildings, including architectural, mechanical, plumbing, fire suppression and electrical components. Since the *registered professionals of record* for these disciplines are usually not licensed in structural design, they commonly require the involvement of supporting registered professionals to undertake the structural design and field review of the subject anchorage and seismic restraint. The recommended practice by AIBC and APEGBC is for these supporting registered professionals to submit Schedules S-B and S-C, to the *registered professional of record* for that particular discipline.

The supporting registered professional can only take responsibility for the anchorage and seismic restraint of components that they design. They are responsible for the structural capacity of the seismic restraint bracing and the attachment of this bracing to the base building structure. They are also responsible for verifying with the *registered professional of record* of the structural discipline that the base building structure can adequately support the seismic loads induced by this bracing. They are not responsible for the structural capacity of the internal components within a piece of equipment that is being braced. For example, the structural integrity of the internal components of an air handling unit is the responsibility of the manufacturer of that piece of equipment, not the supporting registered professional who designs the anchorage and seismic restraint systems.

3. ALTERNATIVE SOLUTIONS

As described in Article 1.2.1.1. in Part 1 of Division A, compliance with the BCBC 2006 can be achieved by either complying with the acceptable solutions described in Division B, or by alternative solutions that fulfill the objectives and functional statements described in Subsection 1.1.2. of Division B.

The BCBC 2006 Letters of Assurance have been developed to address the design approach using the acceptable solutions described in Division B. These Letters are not an appropriate form of accountability for alternative solutions.

The *registered professionals* who prepare alternative solutions for a project should consult with the *authority having jurisdiction* to determine the appropriate form of accountability documentation that is required within that jurisdiction.

17. USE OF PROFESSIONAL SEAL

Both AIBC and APEGBC have issued bulletins or practice notes on the proper use of a professional seal. Refer to these associations' websites for further information.

In accordance with the *Architects Act* and the *Engineers and Geoscientists Act*, all plans and supporting documents, and Letters of Assurance that are prepared by an *registered professional of record* and submitted to an *authority having jurisdiction* must bear the registered professional's seal, signature and date.

If a *registered professional of record* prepares plans and supporting documents for buildings or building components that do not require professional design and field review per Article 2.2.7.1. in Part 2 of Division C, such plans and supporting documents also must bear the registered professional's seal, signature and date. The application of a professional seal to such documents does not trigger a requirement for Letters of Assurance.

Letters of Assurance are only required for projects or building components that fall within the scope of Article 2.2.7.1. in Part 2 of Division C.