

**WABO/SEAW
Liaison Committee**

Washington Association of
Building Officials &
Structural Engineers Association
of Washington

WHITE PAPER 6b-2023

Deferred Submittals	Dated: July 2017 Issue Date: March, 2023
Abstract: <p>This white paper establishes guidelines for building officials, design professionals, contractors and building owners related to the deferred submittal of construction documents and specifications for structural elements.</p> <p>Refer to WABO/SEAW White Paper 7-2011 for information on Seismic Design and Gravity Support Requirements for Non-Structural Components.</p> <p>Refer to WABO/SEAW White Paper 6a-2021 for information on Phased Approvals in Permitting.</p> <p>Code and Standard Reference:</p> <ul style="list-style-type: none">• 2018 IBC• ASCE 7-16	Committee Members: <i>Matt Snook (SEAW Co-chair), Julius Carreon (WABO Co-chair), Shalini Prochazka (SEAW), Nancy Devine (SEAW), Rick Fine (SEAW) (SEAW), Nathalie Boeholt (WABO), Steve Belzak (WABO), Charlie Griffes (SEAW), Hoyt Jeter (WABO), Don Cole (WABO), Sandro Kodama (SEAW).</i>
Committee Mission Statement: <ul style="list-style-type: none">• <i>Improve communications between the public jurisdictions that administer building codes and the engineering design community that prepares construction documents.</i>• <i>Improve consistency and quality of engineering submittals and project reviews.</i>• <i>Build consensus between the engineering design community and building officials with regard to code interpretation and submittal requirements.</i>	

I. INTRODUCTION

As specified in the International Building Code, building departments require that permit applications include construction documents of sufficient detail and completeness to confirm code compliance and inspection of the construction, (see WABO/SEAW White Paper 4-2009, “Structural Permit Submittal Guidelines”). However, the code recognizes that design, fabrication, and construction are iterative processes between the owner, design professional, supplier, building official and contractor. The need to provide flexibility to delay the submittal of certain structural elements was the primary reason for implementation of the regulations allowing deferred submittals.

II. APPLICABILITY

Section 107 of the International Building Code (IBC) recognizes both “phased approvals” (separate building permits for a single building) and “deferred submittals” (submitting specific design portions after a building permit is issued) to accommodate the design and construction process. There is a distinction to be made between “phased approvals” and “deferred submittals”. Phased approvals, addressed in the WABO/SEAW White Paper 6a-2021, relates to the approval to construct a specified scope of work for a significant portion of a single building, such as the foundation, below grade, or above grade levels. Deferred submittals relate to delaying the submittal of some structural elements as specified on the plans for a specific scope of work.

Deferred submittals are construction documents, engineering calculations, design details and other information that are designed, submitted, reviewed, and approved after a building permit is issued but prior to installation of the deferred design elements. The primary structural frame of a building, or any portion thereof, should not be permitted to be a deferred submittal. Deferred submittal documents must be reviewed by the Design Professional in Responsible Charge (EOR or Architect, from now referred to as DPRC) to verify they are in general conformance with the design of the building. Adequate time must be provided for the DPRC and the building official to review and approve deferred submittals prior to installation.

Deferred submittals are commonly prepared by specialty engineers licensed in the state of Washington (not necessarily the EOR), with expertise in the associated discipline who may be employed by a supplier or fabricator. Architectural details of deferred submittal items are typically provided on the approved plans to ensure compliance with non-structural aspects of the applicable codes, but some deferred submittals (such as stairs) should also be reviewed by all responsible parties to verify compliance with code requirements.

Examples of common deferred submittals include:

- Acoustical ceiling suspension systems,
- Unique designs that do not affect the superstructure
- Balconies and Juliette balconies
- Bleachers
- Buckling restrained braced frames (BRBF)
- Canopies and awnings
- Curtain walls, window walls and cladding systems
- Fiber reinforced polymer (FRP)
- Floor or roof trusses
- Guards/ Guardrails
- Non-structural precast concrete elements
- Post-tensioned concrete structural members or panels
- Pre-cast concrete structural members or panels,
- Prefabricated stairs
- Prefabricated wall panels, (non-bearing)
- Pre-stressed concrete structural members or panels,
- Raised floor systems

- Seismic bracing, special certification, and attachment of non-structural components, such as mechanical, plumbing, and electrical systems, etc. (ASCE Chapter 13)
- Shelving systems and steel storage racks
- Skylight systems
- Stone and other veneer (exterior cladding systems)
- Threaded rod hold-down system
- Vehicle barriers
- Metal buildings
- Steel Joists
- Fireproofing (spray applied or intumescent)
- Specialized foundation systems (Helical pile, precast piles, GEO Piers or other ground improvement methods)

III. RECOMMENDATIONS AND GUIDELINES

- The registered DPRC shall clearly identify all deferred submittals on the construction documents.
- The building official shall confirm if the proposed deferred submittals are acceptable.
- Permits for mechanical, electrical, plumbing, fire protection improvements, etc. should not be listed as deferred submittals. These should preferably be included in the original drawing submittal or listed as separate permits.
- Deferred submittal documents shall be reviewed by the registered design professional in responsible charge and notated as required by code before submitting to the building official for review.
- Deferred submittal plans shall be stamped and sealed by a registered design professional (PE, SE, and/or Architect) responsible for the design of the deferred elements. In addition, the registered DPRC for the project shall review and add their review stamp to the plans. Review stamps on design documents by the DPRC should be provided on all sheets that have been reviewed. Alternatively, stamping the cover page with a clear index or narrative outlining which sheets the stamps are applicable to may be acceptable. The same is required for any corresponding calculations, except that typically only the cover sheet is required to be stamped.
- Deferred submittal documents should be submitted to the permitting agency with ample time for review and approval in advance of when the installation is to be started.
- The building official should determine if the deferred documents should be submitted for plan review or if they can be submitted directly to the inspector in the field.
- A pre-construction conference is recommended for large projects where the contractor, DPRC, and building inspector can review scheduling, coordination, and methods of submitting deferred documents.
- The registered DPRC review of the deferred submittal by specialty engineers is for general conformance to the design of the building. For structural deferred submittals, general conformance applies to both the loads imposed and deformation compatibility by the deferred component to the primary building structure. See ASCE Ch 13.

IV. COMMENTARY

- The construction documents submitted with the permit application should be of sufficient clarity and completeness to show that the proposed deferred submittals will conform to the applicable provisions of the codes, laws, and regulations.
- Additional plan review or inspection fees may be charged by the jurisdiction for the additional time to review and administer the deferred documents.
- Deferred submittals should not include the primary structural frame. Refer to WABO/SEAW White Paper 6a regarding Phased Approvals in Permitting for that process.
- Deferred submittals are not a method for submitting design revisions or change orders.
- Specifications and shop drawings such as rebar dimensioning, materials lists, fabrication instructions, etc. are not considered deferred submittals and do not need to be submitted to the building official. Shop drawings that contain an engineered design and require an engineer's stamp should be submitted to the building official for review.

V. APPLICABLE CODE PROVISIONS

IBC Section 107.3.4.1 Deferred submittals. Deferral of any submittal items shall have the prior approval of the building official. The registered design professional in responsible charge shall list the deferred submittals on the construction documents for review by the building official.

Documents for deferred submittal items shall be submitted to the registered design professional in responsible charge who shall review them and forward them to the building official with a notation indicating that the deferred submittal documents have been reviewed and found to be in general conformance to the design of the building. The deferred submittal items shall not be installed until the deferred submittal documents have been approved by the building official.

IBC Section 202 Deferred Submittal. Those portions of the design that are not submitted at the time of the application and that are to be submitted to the building official within a specified period.

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