Series 9 - Considerations for Continuing Permitting and Inspection Activities During COVID-19

Disclaimer

- This information is intended to help AHJs, contractors, and building occupants know what options might be available to continue permitting and inspections.
- These options are not intended to replace AHJ mandates, guidelines, and procedures.
- Not all AHJs have the same resources available to assist in developing processes, so the method of implementation will need to be adjusted to the locally available resources.
- We advise AHJs review and follow AHJ, state, local, and CDC guidelines for protection from virus transmission.

Considerations for Continuing Permitting and Inspection Activities During COVID-19

Building departments across the country are faced with the challenging question of "do we shut down or do we stay open"? Fortunately, there are options that allow continued safe operation of building department staff while insuring safety of installations. Large portions of the US population are facing “stay at home” orders. The Department of Homeland Security and most state authorities have classified the construction industry as an essential service allowing for continued AHJ and industry activity.

There are many AHJs practicing no touch permitting and a growing number utilizing remote video inspection for a broad range of construction projects. Each
AHJ must establish which projects are suitable for this approach. As an example, LA County California’s virtual inspection program is available for 14 different types of construction including:

- Photovoltaic Systems
- Electrical Panel Change-outs
- Smoke and Carbon Monoxide
- Temporary Power Poles
- Window Replacement
- Sewer Connections
- HVAC Change-outs
- Re-inspections
- Water Heaters
- Pad Footings
- Demolitions
- Patio/Decks
- Gas Lines
- Re-roofs

SEAC has collaborated with its diverse stakeholders including building officials and solar/storage construction industry professionals to provide options to building departments for continuing the important work of processing permits and inspecting completed projects.

These options are suggested for consideration by AHJs to determine the best path forward.

**General Considerations**

- **Make Permitting and Inspection Information easy to find (on website).**
  - Provide informational guidance on no-touch permitting and remote video inspection processes on your AHJ website.

- **Establish method for posting and keeping records that can be accessed by remote employees.**
  - Many AHJs have already set this system set up for daily operations.
Considerations for Permitting Installations

- Permit application drop-off
  - Using a physical drop box at the jurisdiction can minimize transmission of Covid-19 versus in-person drop-off, however any physical document processing should be managed in a manner that will minimize the risk of virus transmission.
    - Avoid drop off processes that require lines or congregation of people.
    - Consider waiting period before handling paper documents after drop-off.

- No-Touch Permitting through Electronic permit application
  - Accept permit applications through email or use a web portal. These submission methods are already a common occurrence for many AHJs.
  - Use Dropbox or Google Drive for getting large files transferred to AHJ

- Remote permit processing
  - Permit Techs and Plan Checkers working from home can review applications and issue permits or corrections via email or their online platform.
  - Corrections to plans can be made to PDF’s using the “comment” function (a standard feature in Adobe Acrobat view) or listed in the body of an email.

- Allow application fees to be paid virtually - flexibility payment options will help.
  - Accept payments via credit card, bank transfer, PayPal, Venmo, etc. online or over the phone - consult your water department or property tax collection department for assistance in set up this system.
  - Accept checks via mail.

Considerations for Performing Inspections
• **On-Site INTERIOR Inspections**
  - This method may increase risk of infection, so we encourage consideration of remote inspections for all interior inspections.
  - **NOTE:** an open garage or open space may be considered for an interior inspection, but enclosed conditioned space might not be sensible at this time.
  - When critically necessary on-site interior inspections are performed, the inspector should employ CDC guidelines for minimizing infection transmission.

• **On-Site EXTERIOR Inspections**
  - Inspector must assess the site for compatibility with social distancing guidelines.
  - Since most exterior inspections do not require close human interaction, exterior inspections can likely be conducted while maintaining CDC guidelines for minimizing infection transmission.
  - Leave the plans and documents in an accessible location for inspector access, and follow CDC guidelines for minimizing infection transmission.

• **Remote Inspection (AKA virtual inspection)**
  - **Allow inspections via live videos using** smartphone or tablet with Zoom, FaceTime, WhatsApp, Google Hangouts, Google Duo or another app.
    - Many AHJs that have implemented remote inspection. For a list of AHJs that have already implemented AHJs including Arlington County VA, City of Austin TX, North Carolina Code Officials Qualification Board, City of North Las Vegas NV, Los Angeles County CA, San Bernardino County CA, City of Glendale CA, City of Anaheim CA, City of Cupertino CA, San Mateo County CA, City of Sacramento CA, City of Oceanside CA, County of Sonoma CA, City of Irvine CA, and many more.
    - More information on remote inspection can be found [here](https://www.iccsafe.org/advocacy/coronavirus-response-center/).
Establish criteria for determining which projects are suitable for remote inspection and how to perform inspection.

- The type of inspection is verified by the inspector to be acceptable for remote video inspection.
- Applicant has valid active permit.
- Staff should have sufficient skills and knowledge to use remote video inspection, training is important. See SEAC/IREC/IAEI https://irecusa.org/2020/04/covid19-permitting/
- Person onsite needs to show evidence they are at correct job site address or location during inspection.
- Equipment to help facilitate remote inspections includes: Smart phone, iPad, or laptop with web cam, Flashlight, Level, Tape measure, and any other specialized tools or equipment needed to facilitate a proper inspection (e.g. screwdriver, torque wrench, ladder, etc.).
- Both inspector and person onsite have adequate cellular bandwidth and adequate video quality for to allow an effective video inspection.
- Be aware VPNs (Virtual Private Networks) may dramatically reduce bandwidth dramatically. Disabling VPNs during remote inspection process can improve quality of video.
- An inspection checklist is very helpful.

Additional resources for COVID-19 permitting/inspection and streamlining the solar permitting and inspection processes.

- SEAC webinar discussing the No-Touch Permitting and Remote Video Inspection https://irecusa.org/2020/04/covid19-permitting/
- Consider a one-page permitting application for permitting smaller residential projects allowing for a simplified and fast online approval. Here’s
an example of the residential solar permitting application from the City of Oceanside.

- View the new NFPA document titled “Guidance For Remote Video Inspection (RVI)
- NFPA Blog Article: Implementing Remote Video Inspections: 12 Key Lessons
- NFPA 915 - the “Standard for Remote Inspections” is under development. Learn more at this link.
- CA Solar Permitting Guidebook Streamlined permitting process requirements for California AHJs for residential PV systems including submittal requirements, eligibility checklist, standard plans, and inspection guide.
- View the California Solar and Storage Association's (CALSSA) COVID-19 resource page at https://calssa.org/covid-resource-center
- SolarAPP DOE/NREL funded program to develop solar application permitting portal and automate the permitting process. Searching for AHJ partners to test beta version.