

PROCEDURE: AUDITS OF CERTIFIED ACCESS SPECIALIST (CASp) INSPECTION REPORTS

DISCIPLINE(S): Certified Access Specialists (CASp)

PURPOSE: This document outlines the Division of the State Architect (DSA) procedure for auditing CASp inspection reports. The audit will ensure that the legal benefits of a CASp inspection reports and supporting documentation issued according to the provisions of the Construction Related Accessibility Standards Compliance Act (CRASCA, *Civil Code* § 55.51-55.545) are not jeopardized by the omission of statutorily required information or by improper procedure.

BACKGROUND: Pursuant to Government Code section 4459.7(c): *The State Architect may perform periodic audits of work performed by a certified access specialist as deemed necessary to ensure the desired standard of performance. A certified access specialist shall provide an authorized representative of the State Architect with complete access, at any reasonable hour of the day, to all technical data, reports, records, photographs, design outlines and plans, and files used in building inspection and plan review, with the exception of proprietary and confidential information.*

OVERVIEW: The audit of an inspection report will provide the following:

1. Determine whether or not the requirements of CRASCA have been satisfied.
2. Measure the report's effectiveness at communicating essential information.
3. Recommend improvements in accordance with the [CASp Best Practices Manual](#).

The audit will not include a review of the CASp's interpretation of applicable accessibility codes, standards, and regulations as related to site-specific elements or the overall determination of compliance of the facility.

A CASp whose inspection reports are selected for audit is required to share the inspection report and the requested materials. Failure to participate in the audit or share the requested information with DSA may result in the denial of certification at time of renewal.

A CASp may also volunteer for an audit.

PROCEDURE: Per section 137(a)(3) of the CASp Program Regulations, each CASp that has purchased disability access inspection certificates per Civil Code section 55.53(e)(2), is required to submit a record of the disability access inspection certificates issued to the CASp when applying for certification renewal to the CASp Program. The CASp Program may select from the record up to three reports for audit.

1. AUDIT APPOINTMENT: The audit and is required to have available all requested information for the audit appointment. The CASp may elect either one of three options to participate in the audit appointment:

1.1 Audit via Remote Participation: The audit appointment will be held via a virtual meeting link and teleconference with DSA technical staff. The following will apply:

- DSA will set up the virtual meeting link for the CASp to display the requested documentation.
- DSA technical staff will call the CASp at the designated appointment time at the phone number listed in the CASp's account profile, unless the CASp requests an

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alternate phone number.

- The CASp must supply his/her own resources, including but not limited to computer equipment and telephone, to access the meeting. Any costs incurred to access the meeting shall be borne by the CASp.
- It is the responsibility of the CASp to prepare all requested information in an electronic format that can be displayed via the specified platform. If the CASp does not have all requested material prepared for the audit appointment, if the documentation cannot be displayed, or information cannot be conveyed in a manner satisfactory to the DSA technical staff, the audit appointment will be rescheduled and convened according to options 1.2 or 1.3, as agreed by DSA technical staff.

1.2 Audit via Video Conference: The audit appointment will be at a DSA Regional Office, via a video conference with technical staff at DSA Headquarters. The following will apply:

- The CASp is responsible for all costs incurred for travel to the [DSA Regional Office](#) selected by the CASp for the audit appointment.
- DSA will set up the video conference component for the CASp to display the requested documentation. The CASp must bring his/her own resources, such as computer equipment, to connect wirelessly to the DSA Regional Office guest wireless access point. Agency resources, such as computer equipment, will not be available for use by the CASp.
- The CASp will be required to leave with all materials brought to the appointment.
- It is the responsibility of the CASp to prepare all requested information in an electronic format that can be displayed via the specified platform. If the CASp does not have all requested material prepared for the audit appointment, if the documentation cannot be displayed, or information cannot be conveyed in a manner satisfactory to the DSA technical staff, the audit appointment will be rescheduled and convened according to option 1.3, as selected by DSA technical staff.

1.3 In-person Audit at DSA Headquarters: The audit appointment will be in-person with technical staff at DSA Headquarters. The following will apply:

- The CASp is responsible for all costs incurred for travel to [DSA Headquarters](#) for the audit appointment.
- The CASp must bring his/her own resources to demonstrate the requested information. Agency resources, such as computer equipment, will not be available for use by the CASp.
- The CASp will be required to leave with all materials brought to the appointment.

2. REQUIRED MATERIALS: The CASp is required to bring to the audit appointment the information as specified in Government Code Section 4459.7(c) for each inspection report selected for audit, including but not limited to, all technical data, reports, records, photographs, design outlines and plans, files used in building inspection and plan review, and the written agreement for services. All information shared with the DSA for the audit shall be in Portable Document Format (PDF), unless the CASp arranges with DSA technical staff the use of alternate electronic formats prior to the audit appointment. The report reviewed must be identical to the report submitted to the client.

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2.1 Presentation of Materials: The materials brought to the audit appointment shall be used by the CASp to demonstrate satisfactory evidence of meeting these requirements:

1. All required statutory elements are present in the CASp inspection report;
2. The CASp has substantiated presence on the subject site;
3. That the CASp has demonstrated adequate procedure and analysis to substantiate compliance determinations;
4. The CASp has sufficiently completed the services as indicated in the written agreement with the client.

2.2 Hard Copy Submissions: DSA reserves the right to require that the CASp send to DSA Headquarters any documentation the DSA decides is warranted for in-person examination.

- All costs incurred for sending the requested information shall be borne by the CASp, and pre-paid return packaging shall be provided at the time of submission.
- The CASp may opt to schedule an in-person appointment at DSA Headquarters to review the requested information. All costs incurred for travel to and from the appointment shall be borne by the CASp. The CASp will be required to leave with all materials brought to the appointment.

3. AUDIT RESULT: The result of the audit will be noted in an audit checklist. The audit results in one of two determinations: *Audit Pass* or *Resubmit for Audit Pass*.

3.1 Audit Pass: The auditor will indicate on the audit checklist that the inspection reports have demonstrated satisfactory evidence of the requirements as stipulated in item 2.1 of this procedure, and as a result, merit a grade of audit pass. The audit checklist may contain recommendations for best practices for the CASp that will not affect the favorable outcome of the audit appointment.

The goal of every audit is for all audited inspection reports to receive a grade of Audit Pass. A copy of the audit checklist will be provided to the CASp within 10 business days of the final audit appointment

3.2 Resubmit for Audit Pass: The auditor will indicate on the audit checklist that one or more of the required elements is missing from the CASp inspection report. A copy of the audit checklist will be provided to the CASp via email within five (5) days of the audit appointment indicating the items to be remedied to achieve a grade of Audit Pass, and the date by which such items should be remedied. As a condition for completion of the audit, the auditor may request that the CASp reissue supplemental documentation to the contracted party, and provide proof of remedy to the auditor. For any information that requires remedy, DSA will schedule a supplemental audit appointment for the review of the information in accordance with item 1 of this procedure.

4. INSPECTION REPORTS AUDITED AS A RESULT OF FORMAL COMPLAINT: The filing of a form DSA-607: CASp Consumer Complaint may require the audit and retention of a CASp inspection report and supporting information and documentation materials. This audit procedure applies, and the following amends the procedure accordingly:

4.1 Audited Inspection Report. For the investigation, only the inspection report involved in the complaint investigation will be audited. The investigated report will be required to be

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reviewed under according to the provisions of 1.1, 1.2, or 1.3, as selected by the CASp. DSA technical staff reserve the right to select an alternate method for reviewing the inspection report and supporting documentation and information materials if appropriate for the investigation.

- 4.2 Materials:** DSA will inform the CASp of the information and documentation materials required to be provided to substantiate the report investigated by the audit. If the materials are not adequately demonstrated via an audit appointment, the materials will be required to be submitted electronically or by mail to the CASp Program. The CASp is responsible for all costs incurred in the submission of the requested materials, and if the materials are submitted by mail, the CASp must provide pre-paid return packaging at the time of submission.
- 4.3 Result:** The Audit Result procedure, as delineated in item 3, is not applicable to a CASp inspection report under audit in a complaint investigation.
- 4.4 Retention of the Inspection Report:** Any information or documentation collected will be retained throughout the course of the investigation, and will be returned to the CASp accordingly:
 - Upon conclusion of a decision favorable to the CASp, all information and documentation will be returned to the CASp.
 - Upon conclusion of a decision that imposes disciplinary action against the CASp, all information and documentation in DSA's possession will be retained by DSA in the investigation file. The report will be returned to the CASp when all measures for appeal by the CASp have been exercised, and a final decision has been rendered by the State Architect, or if further pursued by the CASp, by the Superior Court.

ADDITIONAL RESOURCES:

- [Civil Code section 55.51-55.545](#), Construction-Related Accessibility Standards Compliance Act (CRASCA)
- [CASp Program Regulations](#), California Code of Regulations, Title 21, Division 1, Chapter 1, Subchapter 2.5

A Division of the State Architect (DSA) Procedure documents a process or series of steps that DSA staff and/or external stakeholders must complete in order to fulfill one or more administrative requirements of DSA's CASp Program.