



Exemption Requests from Formal Plan Review

Supersedes: "University Download Review Requirements" (Outdated)

Effective Date: August 12, 2026

The State Construction Office (SCO) allows for the exemption of certain small, simple, field verifiable projects from formal plan review and registered North Carolina design professional seal requirements. These projects are NOT exempt from electrical inspections or oversight by SCO but allow for a reduced review timeline. While there is no statutory timeline, SCO strives to approve, deny, or request more information within three (3) business days of submittal.

Exemption requests shall be submitted in email format to SCOexemptions@doa.nc.gov. Submissions shall include all necessary supporting documentation as attachments. The Sender should copy (CC) all relevant parties from the Owner's and Contractor's teams who will require involvement in the project. Any questions regarding this process or a project that may be eligible shall be directed to SCOexemptions@doa.nc.gov.

A. GENERAL CRITERIA

All Exemption Requests must meet the specific criteria listed below (some requests may have additional requirements depending on the scope of proposed work, see Part B):

1. The project must not require the services of a registered design professional for public building and repair projects as defined in NC General Statute §133-1.1 **Certain buildings involving public funds to be designed, etc., by architect or engineer** as modified by Session Law 2026-9 (HB1123), which applies to projects that do not exceed specific financial thresholds as follows:
 - a. \$300,000 for repair of public buildings where such repair does not include major structural change in framing or foundation.
 - b. \$500,000 for repair of public buildings by The University of North Carolina or its constituent institutions where such repair does not include major structural change in the framing or foundation support systems.
 - c. \$150,000 (previously \$100,000) for repairs of public buildings affecting life safety systems (Agency or University)
 - d. \$150,000 (previously \$135,000) for repair of public buildings where repair of public buildings includes major structure changes to the framing or foundation support systems.
2. The request shall originate from the North Carolina Agency, Department, or Educational Institution and shall be provided with all applicable documents and a SCO ID number. This will require the creation of a Project and "Design Contract".
 - a. The project shall be created as a Standard Project; for help, see the Interscope project creation slides [here](#).

- b. The “Design Contract” shall state the Designer as “in-house design by [agency]” or similar, and the Status as “no SCO design contract”; for help, see the Interscope design contract creation slides [here](#).
- 3. The Owning Agency may request the aid or advice of an outside Contractor or Design Professional, but the outside entity shall not:
 - a. enter into a design services agreement with the Owning Agency
 - b. be compensated for design advice
 - c. be responsible for project design or administration

If an outside Design Professional is contracted by the Owning Agency for any of the roles listed above, the project will not be eligible for exemption from formal plan review and shall be submitted to SCO through the formal process.

- 4. SCO must concur that the project lacks the complexity that would require formal design and review. SCO reserves the right to reject an exemption request if the SCO Reviewer determines the project's scope and complexity warrant a formal review. Exemption requests will be evaluated strictly on a case-by-case basis.
- 5. All work shall be performed by, or under the supervision of, a NC contractor licensed in the appropriate trade(s).

B. EXEMPTION CATEGORIES

To effectively manage project oversight, the SCO has established three distinct categories for exemption requests. These categories differentiate projects based on their total cost, technical complexity, and potential risk profile.

Category 1: In-House Minor Projects This category applies to small, simplified projects that are easily field verifiable and that do not alter building systems or use of space in any significant way. To qualify for this category, the work must be executed exclusively by in-house staff (requiring no external construction contract) and must require only a single electrical inspection.

Examples include:

- a. Relocation or addition of a receptacle or switch that does not significantly alter the load of a circuit.
- b. Luminaire replacement or retrofit.
- c. Like-in-kind equipment replacement - such as Variable Frequency Drive (VFD) to VFD, but NOT constant speed drive to VFD motors. HVAC equipment/appliance replacements that change the refrigerant type used are not included in this category. Nameplate information for existing and new equipment shall be provided for these requests.
- d. Addition of occupancy sensors when NO new switches or wiring is involved AND no emergency lighting circuits are affected.

- e. Installation of programmable thermostats replacing existing thermostats.
- f. Exit sign replacement - replacing existing exit signs with LED types when NO additional signs or relocations are involved. Directional arrows on signs must remain identical to existing conditions (as last designed and approved).
- g. Minor modification to a telecom system such as the addition of outlets or wireless access points. Alterations to equipment in data rooms or control system program are not included in this category.
- h. Repair or replacement of shingle roofing, provided no structural elements are involved.
- i. Replacement of existing door hardware provided no change in locking functionality or access controls such as electronic card access or delayed door release are involved; or replacing existing door hardware with ADA compliant hardware, such as push bars. However, addition of new or modifications to existing access controls, where interconnected with a fire alarm system, are not considered in this category.

Category 2: Contracted Minor Projects This category applies to small-scale projects that require minimal documentation, narrative explanation, and do not require complex calculations. These projects may involve a minor change in space utilization or a limited alteration to existing building systems. Work in this category may be carried out by an outside contractor and may necessitate multiple trade or electrical inspections.

Examples include:

- a. Changing the use of a space, including non-load bearing and/or non-fire rated walls, without changing the occupancy classification of the building or space; for example, changing two private offices into a small conference room or vice-versa.
- b. Equipment replacement (not like-in-kind) – such as replacing a gas water heater with an electric water heater.
- c. Installation of underground electrical feeders or branch circuits that add only minor load to an electrical system.
- d. Modification or addition of access controls that are not interconnected to the fire alarm system.
- e. Addition or modification of an electric vehicle (EV) charging station.
- f. Adding electrical equipment to an existing accessory or storage building or structure. The existing building or structure shall have been previously approved by SCO without the intent to add electrical equipment; the installation of electrical equipment and the construction of the structure shall not be submitted separately if it is part of the same project or initiative.

Category 3: Statutory Exempt Projects This category encompasses projects that technically fall below the financial thresholds mandated by NC G.S. §133-1.1, yet, in the judgement of the SCO Reviewer, incorporate a degree of structural, operational, or mechanical complexity which necessitates a more thorough review by SCO.

Examples include:

- a. Adding walls or partitions that alter the building's egress path.
- b. Alterations that affect life-safety systems, such as emergency lighting (including changing emergency lights from fluorescent to LED), sprinklers, fire alarm, etc.
- c. Alterations to the HVAC system that may affect the air balancing within the building.
- d. Alterations to gas lines.
- e. Alterations to the existing fire alarm system that would require the completion of reacceptance testing per NFPA 72 Article 14.4.2.
- f. Replacement of an existing HVAC equipment/appliance where the new refrigerant categorization differs from the refrigerant currently used in the existing equipment/appliance.

C. REQUEST REQUIREMENTS

The submittal documentation to be included in the transmittal to SCO varies depending on the category of the request and the nature of the project. Any project having electrical scope of work shall be inspected by the State Electrical Field Inspector assigned to the territory prior to covering or energizing; inspections shall be scheduled Monday through Friday during normal business hours.

The following must be provided with each exemption request; however, the SCO Reviewer may determine that additional information is required to properly evaluate the request:

1. Category 1 Requests:

- a. Complete the exemption request form (attached).
- b. Provide a full description of the scope of work including any incidental work required for project completion.
- c. Provide sketches as applicable to the scope of work, including identification of electrical source characteristics (for example, if a new circuit breaker is to be added to a panel provide the ampacity of the panel, panel designation, and circuit designation).
- d. Reference and notify SCO of any related or nearby ongoing or planned projects that may affect the scope of the request.
- e. Specify an estimated total cost of the scope of work (this is not required to be itemized for Category 1).

2. Category 2 Requests:

- a. Includes all Category 1 requirements.
- b. Require a Contractor properly licensed in NC to perform the work.
- c. Provide at least a sketch showing the existing conditions around the project scope.
- d. Provide a load calculation based on NEC Article 220 for new electrical work; provide either load calculations, highest annual peak demand from the previous five (5) years, or results of a minimum 30-day meter test for existing loads.
- e. Identify the occupancy classification of the area.

- f. Identify building life safety information such as if the building is sprinklered, the extents of existing fire alarm coverage, etc.

3. Category 3 Requests:

- a. Includes all Category 1 and 2 requirements.
- b. The Project Monitor identified on the Exemption Request form shall be a design professional registered in North Carolina and employed by the Owning Agency/University. The registered design professional shall act on behalf of SCO as the Authority Having Jurisdiction (AHJ), serve as Construction Administrator for the project, perform regular inspections, and verify that the work is being completed adequately in accordance with all applicable codes.
- c. Existing record drawings for areas within the project scope.
- d. Descriptions of code implications affected by the scope of work.
- e. Specific engineering information for all equipment involved in scope of work.
- f. Details for systems involved in the scope of work (this may include systems adjacent to or more distantly connected to the scope) - For example, if emergency lighting alterations are proposed then information regarding the existing emergency generator may be required to assist SCO to evaluate how this proposed scope will affect the entire building.
- g. HVAC equipment/appliance replacements shall identify the existing and new refrigerant types utilized.

D. LIMITATIONS

Ineligibility for Exemption from Formal Plan Review

A project is strictly ineligible for an exemption and must be submitted to SCO through the formal plan review process if any of the following conditions apply:

- **Statutory Cost Thresholds:** The estimated project cost exceeds the limitations established in N.C.G.S. 133-1.1 or is close enough to those limits that unforeseen contingencies or change orders could reasonably increase the final project cost over the threshold.
- **External Design Professionals:** An outside, third-party registered NC design professional (not directly employed by the Owner) is under contract to perform design work, provide construction administration, or otherwise participate in the project.
- **Administrative Discretion:** The SCO Reviewer determines that the technical complexity or perceived risk of the project warrants a formal design and comprehensive review.
- **Environmental and Floodplain Impacts:** The project requires a Floodplain Development Permit, which disqualifies it from exemption eligibility regardless of the total project cost.
- **Scheduling and Inspection Constraints:** The project requires the SCO Electrical Field Inspector to conduct inspections after normal business hours Monday through Friday or during state holidays/weekends.

- **Solar Projects:** The project involves addition or modification of photovoltaic systems, which disqualifies it from exemption eligibility regardless of the total project cost.
- **Change in Occupancy Type:** The project changes the occupancy classification of the building or space, which disqualifies it from exemption eligibility regardless of the total project cost.
- **Electrical Distribution Equipment Replacement:** The project replaces existing electrical distribution equipment such as generators, switchgear, switchboards, or panelboards and/or requires the recalculation of Ampere Interrupting Capacity (AIC) ratings, arc-energy boundaries, etc., which disqualifies it from exemption eligibility regardless of the total project cost.

SCO Design Review Exemption Request

The State Construction Office (SCO) allows requests for exemption of certain small projects from the formal design review process, but not from total oversight. These projects shall be designed by in-house staff of the Owning Agency/University and shall not exceed the fiscal limits of NC General Statute §133-1.1. For all requests, exemptions are granted at the sole discretion of the State Construction Office.



Owning Agency/University: _____

Project Address: _____

Building Name where project is located: _____

Building Date of Construction: _____ Will asbestos abatement be required? Y N

Construction Type: _____ Occupancy: _____

SCO ID Number: _____

Construction Cost:	In-House Budget	Contracted Budget	Total Budget
	\$	\$	\$

Who has performed the "design" for this project? In-house Contracted Designer*

*Projects that utilize a Contracted Designer are not eligible for Exemption.

	Y	N
Will any Life-Safety Systems be affected?		
Will any egress paths be affected?		
Is the project area/building sprinkled?		
Will any fire-rated or load-bearing walls be affected?		
Is the project area hazardously classified or will the project cause it to become hazardously classified? (see NEC Art. 501)		
Will the scope include significant changes to either the framing or foundation?		
Is the project located within a Special Flood Hazard Area (100-year floodplain) or a Moderate Flood Hazard Area (500-year floodplain)? To verify, please check the site location using the Flood Risk Information System (FRIS): https://fris.nc.gov .		

Construction Manager: _____

I/we understand if the project includes scope outside of the electrical discipline, a Design Professional registered in North Carolina and employed by the Owning Agency/University shall act as the Construction Manager and Authority Having Jurisdiction on behalf of SCO. If an outside Design Professional is contracted for the design of this project, it will no longer be eligible for exemption.

Signed:

Project Scope:

Discipline:		Scope Summary (statement “work defined on plan” is not acceptable)
	Electrical	
	Mechanical	
	Plumbing	
	Architectural	
	Fire Alarm/Sprinkler	
	Civil/Structural	

Provide all relevant information necessary for SCO to evaluate this request, this includes but is not limited to: Existing conditions, equipment specifications (cut sheets are typically acceptable), conductor and conduit sizes/ratings, overcurrent protection, etc. below:

Provide sketch of proposed work in a separate document.