



CITY OF PITTSBURGH
DEPARTMENT OF PERMITS, LICENSES & INSPECTIONS
JOHN P. ROBIN CIVIC BUILDING

PLI's Third Party Agency Services Policy	Issued: 5/24/2022
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PURPOSE: The following document outlines PLI's current Third Party Agency (TPA) Services policies and procedures. These measures are temporary and will be repealed or amended as necessary by PLI.

PLI'S THIRD PARTY AGENCY (TPA) SERVICES POLICY

1. **Applicability.** This policy replaces all previous TPA policies effective the date the policy is issued.
2. **Definitions.** The following definitions are applicable to this policy:
 - a. **Third Party Agency (TPA):** Agency registered and approved by PLI to perform inspection services on behalf of PLI per this policy.
 - b. **TPA Inspector:** An inspector who is employed by a TPA and is registered and approved by PLI to perform inspections on behalf of PLI per this policy.
 - c. **Residential Building:** Residential buildings consist of “[d]etached one-family and two-family dwellings and townhouses which are not more than three stories above grade plane in height with a separate means of egress and their accessory structures.”¹
 - d. **Commercial Building:** Commercial buildings consist of “[a] building, structure or facility that is not a residential building.”¹
 - e. **Residential Permit:** PLI permit issued for a *residential building*. Note the permit type is identified on the PLI permit document.

¹ Pennsylvania Uniform Construction Code (UCC) Section 401

- f. Commercial Permit: PLI permit issued for a *commercial building*. Note the permit type is identified on the PLI permit document. All stormwater permits are considered commercial permits.

3. Current TPA Services. PLI's current TPA services are as follows:

- a. Authorized TPA Services. PLI currently requires TPA inspection for electrical permits and TPA inspection for stormwater permits as outlined in this policy. No other TPA services are authorized or accepted by PLI.
- b. TPA Service Applicability. TPA services shall apply based on the following:
 - i. Stormwater Permits: TPAs shall inspect all stormwater permits issued after the effective date of this policy.
 - ii. Electrical Permits. TPA inspections are based on the following:
 - 1. TPA Inspection. TPAs shall inspect all commercial electrical permits. TPAs shall inspect all residential electrical permits issued **before January 1, 2021**. If an existing residential electrical permit is amended, for any reason, upon issuance the permit will be subject to PLI inspection.
 - 2. PLI Inspection. PLI shall inspect all residential electrical permits **issued after January 1, 2021**, including amended permits. PLI shall perform all commercial electrical energy inspections. The PLI identifies when commercial electrical energy inspections are required. All PLI inspections shall be requested through the OneStopPGH portal.
- c. PLI Permit Fee Discount: PLI shall discount the permit fees for all permits requiring TPA services per PLI's current fee schedule.

4. TPA Registration with PLI. All TPAs and TPA Inspectors shall be registered with PLI prior to performing any inspections for permits within the City of Pittsburgh and shall comply with the following:

- a. General Requirements. All TPAs and TPA Inspectors shall comply with the following general registration requirements:
 - i. L&I TPA Certification: A TPA providing electrical inspections shall maintain a TPA Certification from the Pennsylvania Department of Labor & Industry (L&I).
 - ii. Insurance Coverage: TPAs shall maintain a minimum of \$1,000,000 of professional errors and omissions coverage.

- iii. Inspector as Employee: All TPA Inspectors shall be employees of the TPA, as defined by the United States Internal Revenue Service, and may not be an agent or consultants to the TPA.
 - iv. TPA Inspector: TPA Inspectors shall be minimum of 18 years old and hold certifications as follows:
 - 1. Stormwater: A TPA Inspector for stormwater permits shall maintain a valid commercial plumbing inspection certification from the International Code Council (ICC).
 - 2. Electrical: A TPA Inspector for electrical permits shall maintain a valid commercial electrical inspection certification from the Pennsylvania Department of Labor & Industry.
 - v. Notification of Personnel Changes: The TPA shall notify PLI within thirty (30) days of personnel changes in TPA's inspection staff.
 - vi. Renewal: TPAs shall renew their TPA registration by submitting all registration documents by January 1st of each year.
- b. Submission Requirements: Current TPA forms can be found here: <https://pittsburghpa.gov/pli/reg-agencies>. The TPA shall submit the following documents to PLIConstructionSupervisors@pittsburghpa.gov:
- i. TPA Registration Application: Completed and notarized PLI TPA Registration Application.
 - ii. L&I TPA Certification: A copy of the Pennsylvania Department of Labor & Industry TPA Certification. This is required for electrical inspections only.
 - iii. Certificate of Insurance: A copy of the Certificate of Insurance identifying:
 - 1. Required insurance coverage.
 - 2. Workers' Compensation Insurance.
 - 3. The City of Pittsburgh as a certificate holder.
 - iv. TPA Inspector Registration Application: Completed PLI TPA Inspector Registration Application, one for each Inspector who will perform TPA services.
 - v. Inspector Documentation:
 - 1. Copy of government-issued photo ID.
 - 2. Copy of certifications identified in Section 4.a.iv.
 - 3. Evidence of a minimum of five (5) years of qualifying experience as follows:

- a. Stormwater Inspections: Performing commercial plumbing inspection or plan review services. Performing contractor services under the UCC as a registered plumber. Performing design services for plumbing systems as a PA Licensed Design Professional.
 - b. Electrical Inspections: Performing UCC electrical inspection or plan review services. Performing contractor services under the UCC as a registered electrician. Performing professional design services for electrical systems as a PA Licensed Design Professional.
 - 4. Provide the results of an ePATCH criminal record check:
<https://epatch.state.pa.us/>.
 - c. PLI Registration Review: The Building Code Official, or their designee, shall review the TPA and TPA Inspector(s) applications to verify compliance with registration requirements including required qualifications and documentation. After review, PLI shall provide a written response to identify missing information and/or to confirm approval or denial. A TPA and TPA Inspector shall not perform TPA services until written documentation of PLI approval has been provided.
- 5. TPA & TPA Inspector Responsibilities.** TPAs and TPA Inspectors shall comply with the following:
- a. General Requirements: TPAs and TPA Inspectors shall maintain certifications and PLI registration as identified in this policy and shall adhere to the following:
 - i. Use Current PLI Forms. TPAs and TPA Inspectors shall use PLI's current TPA forms. Old forms will not be accepted by PLI.
 - ii. Performance of Inspections: TPA Inspectors shall perform inspections based on the approved construction documents as follows:
 - 1. Stormwater: Stormwater inspections shall be performed in compliance with City of Pittsburgh City Code Title 13 and PLI's Stormwater Inspection Checklist
 - 2. Electrical: Electrical inspections shall be performed in compliance with the UCC and City of Pittsburgh City Code.

- iii. TPA Inspector Conflict of Interest: The TPA Inspector shall recuse themselves from performing TPA services for PLI permits in which they have a personal or financial interest.
 - iv. Maintenance of Records: The TPA shall maintain records of all TPA services provided to PLI and provide records upon PLI request.
 - b. Enforce Code Requirements: The TPA Inspector shall enforce code requirements as follows:
 - i. Permit Posing/Validity: Confirm a copy of the PLI permit is posted at the job site and covers all work performed.
 - ii. Approved documents: Confirm the permit holder has a copy of the approved construction documents.
 - iii. Compliance: Confirm work complies with any permit conditions and:
 - 1. Stormwater. City of Pittsburgh City Code Title 13 and PLI's Stormwater Inspection Checklist.
 - 2. Electrical. PA UCC requirements and City of Pittsburgh City Code.
 - iv. Permit Close-out: Final Inspection approval shall not be provided until all work is completed and in compliance with applicable codes and ordinances.
 - c. Notification of violations: Notify PLI Immediately of any job-site violations including, but not limited to:
 - i. Performance of work without a permit.
 - ii. Performing work outside of the approved permit scope.
 - iii. Installing work such that it creates a dangerous condition.
 - d. Permit Specific Documentation: The TPA and TPA inspector shall provide the following:
 - i. PLI Permit Assignment form: Provide a completed TPA Inspector Permit Assignment form to identify which TPA and TPA Inspector(s) are providing services for the PLI permit. The form is required prior to permit issuance and shall identify the inspector(s)'s name, certification #, and contact info.
 - ii. TPA Inspection Documentation: The TPA Inspector shall record all inspections as follows:
 - 1. Stormwater. Document all inspections on PLI's Stormwater Inspection Checklist.
 - 2. Electrical. Document inspections, including temporary services, on the TPA Inspection Report and Compliance Form to include the following:

- a. The PLI permit number and associated job address;
- b. The Inspection description is to include:
 - i. Type of inspection (rough, final, partial final, etc.)
 - ii. For partial inspections identify the areas inspected, e.g. partial rough inspection of the 1st floor.
- iii. TPA Inspection Submission: The TPA agency shall provide the TPA Inspection Documentation to the permit holder in an un-editable format such as PDF or image file. Note the permit holder is to submit this documentation to PLI within 2 (two) business days of the inspection.

6. Permit Holder Responsibilities. The permit holder shall comply with the following:

- a. General Requirements. Permit holders shall comply with these general requirements:
 - i. Valid Permit: Obtain a validly issued permit prior to performing work.
 - ii. Valid PLI License: Maintain a valid license for the duration of all PLI-issued permits.
 - iii. Permit Posting: Post a copy of the PLI permit on the job site where it is visible to the public.
 - iv. Approved Documents: Maintain a copy of PLI-approved construction documents, as applicable, for reference by the TPA Inspector and/or PLI inspector.
 - v. Keep Work Exposed: Keep work exposed until passed TPA inspection is granted and concealment is authorized.
- b. TPA Inspections. The Permit holder shall comply with these TPA Inspection requirements:
 - i. Engage a TPA: The permit holder is responsible to engage a registered TPA as required by this policy.
 - ii. Identify TPA Prior to Permit Issuance: The permit holder shall provide a TPA Inspector Permit Assignment form prior to issuance of a PLI permit. The permit holder shall document the change of assigned TPA by immediately uploading a revised form as a closeout document via the OneStopPGH portal.
 - iii. TPA Inspection Documentation: The permit holders shall upload TPA Inspection Documents as a closeout document via the OneStopPGH portal within two (2) business days from the date of the inspection. The file name shall identify the documentation as “TPA progress” or “TPA final” as applicable.

- iv. Inspection Request: The permit holder shall request a “TPA Report Submission” inspection via the OneStopPGH portal. This action notifies PLI that you have submitted TPA inspection Documentation. Failure to take this action results in the inspection not being recorded in OneStopPGH and may delay the overall progress of the development project.
- v. TPA Inspector Change: If the TPA Inspector(s) change, a revised TPA Inspector Permit Assignment form shall be submitted as a close-out document via the OneStopPGH portal prior to the new TPA inspector performing inspections.

7. **PLI Audit**

- a. Applicability: PLI will audit approved TPA services at the discretion of the Director and/or Building Code Official.
- b. Audit Purpose: Confirm TPA services are performed in compliance with this policy and other applicable codes and regulations including, but not limited to:
 - i. Approving work for which a permit is required but has not been issued.
 - ii. Approving work that is outside of the approved scope of an issued permit.
 - iii. Approving work without performing the necessary inspections.
 - iv. Approving non-compliant work.
 - v. Providing a final inspection for a permit for which work is not complete.
 - vi. Failure to identify necessary corrections to the permit holder.
 - vii. Failure to notify PLI of any violations, including those that pose dangerous conditions.
 - viii. Failure to provide records of TPA inspection to PLI upon request.
 - ix. Failure to maintain the requirements for registration.

8. **TPA Related Penalties.** The following penalties shall apply for violations of this policy:

- a. Permit Holders. PLI may take the following actions if a permit holder fails to comply with this policy:
 - i. Withholding permit issuance.
 - ii. Issuance of request for compliance with permit holder identified as a defendant which may lead to fines of up to \$1,000 per violation per day each violation exists.
 - iii. Issuance of a Stop Work order for associated permit(s).
 - iv. Revocation of associated permit(s).

- v. Suspension and/or revocation of permit holder license per Licensing Rules and Regulations.
- b. TPA. PLI may take the following actions if a TPA fails to comply with this policy:
 - i. Issuance of request for compliance with the TPA identified as a defendant which may lead to fines of up to \$1,000 per violation per day each violation exists.
 - ii. Issuance of a Stop Work order for associated permit(s).
 - iii. Suspension and/or revocation of TPA's PLI registration.
- c. TPA Inspector: PLI may take the following actions if a TPA Inspector fails to comply with this policy:
 - i. Issuance of request for compliance with TPA inspector identified as a defendant which may lead to fines of up to \$1,000 per violation per day each violation exists.
 - ii. Issuance of a Stop Work order for associated permit(s).
 - iii. Suspension and/or revocation of TPA Inspector's PLI registration.