Texas Windstorm Insurance Association (TWIA) Insurability Requirements

Purpose

Texas Windstorm Insurance Association (TWIA) Chapter 2210 of the Texas Insurance Code (codified version) authorizes the Texas Windstorm Insurance Association (TWIA) to provide windstorm and hail insurance in the designated catastrophe areas of the State of Texas.

Inspection Requirement

Subchapter F of Chapter 2210 of the Texas Insurance Code establishes certain inspection requirements for structures to be considered insurable property for windstorm and hail insurance through TWIA. While these inspections <u>are not mandatory</u>, to be eligible for windstorm and hail insurance coverage through the TWIA, all new construction, repairs, alterations (including roofing) or additions, which commenced on or after January 1, 1988, must be inspected by a qualified inspector, and then approved and certified by the Texas Department of Insurance (TDI) for compliance with the building specifications in the TWIA Plan of Operation.

Section 2210.251(c) requires a person to submit an application for windstorm inspection to the TDI Inspections Division before beginning to construct, alter, remodel, enlarge, or repair a structure. The law further states that failure to submit a timely application may result in a certificate of compliance (WPI-8) not being issued unless plans calculations, testing information, manufacturer's installation instructions, or any other documentation required by the Commissioner is submitted to the TDI Inspections Division. These provisions apply to all construction commenced after January 1, 2004.

Scope of TWIA Coverage

Designated Catastrophe Areas

The requirements for windstorm and hail insurance coverage apply only to structures located in areas designated as a "catastrophe area" by the Commissioner of the TDI. The current designated "catastrophe areas" are detailed below.

Aransas County	Refugio County
Brazoria County	San Patricio County
Calhoun County	Willacy County
Cameron County	The following cities within Harris
	County:
Chambers County	Morgans Point
Galveston County	La Porte
Jefferson County.	Shoreacres
Kenedy County	Seabrook
Kleberg County	Pasadena
Matagorda County	East of State Highway 146 and within
	the city limits
Nueces County	

Wind Zones

Each of the designated catastrophe areas is divided into three zones. Building specifications applicable to each zone differ and are specified on the following page. The three zones are defined as follows:

- **Seaward:** Areas seaward of the Intracoastal Waterway.
- **Inland I:** Areas inland of the Intracoastal Waterway and east of the specified boundary line, and certain areas within Harris County.
- Inland II: Inland areas that are west of the specified boundary line.

TWIA Plan of Operation Building Specifications

Building Specifications

To be certified by the TDI as insurable by TWIA, new structures, additions, repairs, alterations, roofing and re-roofing, and the relocation of existing structures, which are located in the designated catastrophe areas and which commence construction on or after January 1, 2008 shall be built to resist wind loads using one of the following codes:

- International Residential Code (IRC), 2006 edition, with Texas Revisions
- International Building Code (IBC), 2006 edition, with Texas Revisions

Basic Wind Speed Requirements

Each of the designated catastrophe areas eligible for TWIA windstorm and hail insurance coverage is divided into three (3) wind zones, called Inland II, Inland I, and Seaward. The TDI established basic wind speed requirements for each of these zones using the basic wind speed map of ASCE 7-05, which is also included in the IRC and IBC. The minimum basic wind speed requirements for each wind zone are as follows:

- **Inland II:** Structures built in the Inland II area as established by the TDI shall be designed and constructed to resist a 3-second gust basic wind speed of 110 miles per hour.
- Inland I: Structures built in the Inland I area as established by the TDI shall be designed and constructed to resist a 3-second gust basic wind speed of 120 miles per hour.
- Seaward: Structures built in the seaward area as established by the TDI shall be designed and constructed to resist a 3-second gust basic wind speed of 130 miles per hour.

Applicability: Construction Requiring Inspection to Obtain TWIA Coverage

Construction That May be Certified

To be eligible for windstorm and hail insurance coverage through the TWIA, all structures constructed, moved, altered, and/or repaired, where construction started on or after January 1, 1988, must be certified by the TDI as compliant with the building code specifications adopted by the Commissioner of Insurance for the time period in which it is/was built.

Types of construction that require certificates of compliance are:

- new structures,
- additions,
- repairs,
- alterations,
- foundations,
- roofing and re-roofing,
- mechanical, and
- relocated structures.

A definition of each construction type follows.

New Structures

New structures are defined as the complete construction of a structure, which includes the foundation; rough framing; final framing (e.g., windborne debris protection devices, exterior wall coverings, exterior roof coverings); and exterior mechanical equipment; that does not share a common foundation, wall or roof with any other structure.

New structures that may be certified include:

Portable and Temporary Buildings

A portable and temporary structure set apart from the main structure by clear space and can be easily moved to another location.

Industrialized Housing

Industrialized housing is a residential structure that is designed for the use and occupancy of one or more families. The building is constructed in modules or using modular components that are built at a location other than the permanent resident site. The building is designed to be used as a permanent residential structure when the module or modular components are transported to the permanent residential site and are constructed or installed on a permanent foundation system.

Although manufactured homes (mobile homes) are insured by TWIA, the TDI
 <u>DOES NOT</u> make these inspections. Standards for these structures are
 governed by the Texas Department of Housing and Community Affairs
 (TDHCA).

Applicability: Construction Requiring Inspection to Obtain TWIA Coverage, Continued

New Structures, continued

Construction Over Water

Boat houses, docks, piers, and other structures built over water are specifically excluded from the TWIA windstorm insurance policy. However, they may be added to the policy. Therefore, if these structures are to be insured, they must be inspected and approved by the Texas Department of Insurance. Walkways, breezeways or other similar types of construction which are used to connect structures built over water to a main structure located on land should be constructed so that if the structure over water should be destroyed by flooding or storm surge, the walkway or breezeway will break away without causing damage to the main structure located on land.

Additions

An addition is any construction that results in the increase in square footage area of an existing structure. An addition may include a foundation, rough framing, final framing and exterior mechanical equipment such as is described for that of a new structure.

Any portions of the existing structure which carry loads from the addition, or become exposed due to the addition, shall comply with the applicable building specifications. All new construction and structural components of the existing structure or foundation systems shall be capable of carrying the loads imposed by the new construction.

Repairs

A repair is any reconstruction/restoration of an existing structure that is deteriorated or damaged. Repairs must be inspected for compliance with the building specifications to be eligible for insurance coverage through TWIA, unless the repair is specifically excluded.

Alterations

An alteration is any modification that physically changes the exterior portion of a structure without increasing its square footage area.

Foundations

Foundations require inspections and should be examined in order to substantiate that loads comply with the applicable building specifications. The foundation system must be capable of carrying the load which will be imposed upon it by any construction that it supports.

Roofing and Re-roofing

Roofing and re-roofing includes the covering applied to the roof deck for protection from weather, fire classification, or appearance, or reconstruction renewal of any part of the existing roof for the purpose of its maintenance.

Mechanical

Mechanical equipment (including A/C compressors or other equipment or mechanical devices) must be inspected in order to determine or verify that the equipment is securely fastened and/or anchored in compliance with the applicable building standard with respect to wind resistance.

Relocated Structures

Relocated structures are defined as existing structures that are relocated to a designated catastrophe area. When a structure is moved to a designated catastrophe area, the following guidelines apply:

- If the structure was built outside of the catastrophe areas designated by the Commissioner of Insurance and is being moved into the designated catastrophe area, then the existing structure, the new foundation, and the anchorage to the foundation must be inspected and certified by an appointed Texas licensed professional engineer.
- If the structure was built prior to 1988, and was not built within the designated catastrophe areas designated by the Commissioner of Insurance and was not built in accordance with a building code recognized by TWIA, and has not been previously insured by the TWIA, or if the structure was built after 1988, but was never certified by the Texas Department of Insurance, the existing structure, the new foundation, and the anchorage to the foundation must be inspected and certified by an appointed Texas licensed professional engineer.
- If the structure was built prior to 1988, and was built within catastrophe areas
 designated by the Commissioner of Insurance and was built in accordance
 with a building code recognized by TWIA, or was previously insured by a
 licensed carrier, then only the new foundation and the anchorage of the
 structure to that foundation will be required to be inspected. This inspection
 must be performed by an appointed Texas licensed professional engineer.
- If the structure was built after 1988 and has been certified by the Texas
 Department of Insurance, then only the new foundation and the anchorage to
 that foundation will be required to be inspected. This inspection must be
 performed by an appointed Texas licensed professional engineer.

Inspection Not Required

There are certain items that are not required to be inspected in order to be eligible for windstorm and hail insurance coverage through the TWIA.

General Exclusions

The following types of construction do not require an inspection for compliance for windstorm and hail insurance through the TWIA:

- repairs to roofs less than 100 square feet (one square),
- repairs or replacement of gutters,
- replacement of decorative shutters,
- repairs to breakaway walls,
- fascia repairs,
- repairs to porch and balcony railings,
- · repairs to stairways/steps and wheelchair ramps,
- protective measures before a storm,
- temporary repairs after a storm,
- leveling and repairs to an existing slab on grade foundation, unless wall and/or foundation anchorage is altered or repaired,
- fence repair,
- painting, carpeting, and refinishing,
- plumbing and electrical repairs,
- repairs to slabs poured on the ground for patios (including slabs under homes on pilings),
- repairs or replacement of soffits less than 24 inches in width,
- repairs or replacement of non-structural interior fixtures, cabinets, partitions (non-loadbearing), surfaces, trims or equipment,
- replacement of glass in windows or glass doors or replacement of exterior doors not involving the frames provided that the area is less than 10% of the surface area of the affected side (elevation) of the structure, and
- replacement of exterior siding provided that the area is less than 10% of the surface area of the affected side (elevation) of the structure.

Repairs, Additions and Alterations to Historic Structures

Repairs, alterations and additions necessary for the preservation, restoration, rehabilitation or continued use of a historic structure will not require inspection and need not comply with the building specifications provided that at least one of the following conditions apply:

- The structure is listed or is eligible for listing on the National Register of Historic locations.
- The structure is a Recorded Texas Historic Landmark.
- The structure has been specifically designated by official action of a legally constituted municipal or county authority as having special historical or architectural significance, is at least 50 years old and is subject to the municipal or county requirements relative to construction, alteration, or repair of the structure, in order to maintain its historical designation.

Note: It is recommended that construction to historical structures comply with the building specifications whenever possible without violating any of the requirements necessary to maintain its historical designation.

Structures Built Before 1988

Structures constructed, repaired or to which additions were made before January 1, 1988 will not require inspection and need not comply with the building specifications provided that one of the following conditions apply:

- The structure is located in an area covered at that time by a building code recognized by TWIA, or
- The structure has been previously insured by a licensed insurance company authorized to do business in Texas and the risk is in essentially the same condition as when previously insured.

Section 2210.251 details additional requirements for structures built before January 1, 1988.

Engineer Certification Requirements and Procedures

General

To be eligible for windstorm and hail insurance through the TWIA, all structures built, altered, and/or repaired, where construction started on or after January 1, 1988, must be inspected by a qualified inspector who has been appointed by the Commissioner of Insurance and the construction is found to be in compliance with the TWIA Plan of Operation building specifications detailed in this document.

Qualified inspectors are persons determined by TDI to be qualified to perform inspections because of training or experience, which include Texas licensed professional engineers appointed by the Commissioner of Insurance.

This section explains the requirements and procedures for obtaining certification of compliance using an appointed engineer.

Appointment as a Qualified Inspector

In accordance with 28 Texas Administrative Code §5.4604, a Texas licensed professional engineer must be appointed as a qualified inspector by the Commissioner of Insurance before they can inspect and certify for compliance with the building specification as evidence of insurability for windstorm and hail insurance coverage through TWIA.

The process by which a Texas Licensed Engineer may become appointed as a qualified windstorm inspector is as follows:

- The engineer must complete an Application for Appointment as a Qualified Inspector form (ENG-1) and submit it along with all supporting documentation to TDI.
- TDI engineering staff will review the ENG-1 form, along with all supporting documentation, and contact the Texas Board of Professional Engineers to determine if the engineer's professional registration is current.
- If the appointment is approved, TDI will distribute a notice of appointment as a qualified inspector to all interested parties and post the engineer's name to TDI's Appointed Engineer list.

Requirements for Engineer Certification

TDI will accept documentation for certification by an appointed engineer on any structure that complies with the TWIA Plan of Operation building specifications. Additionally, certain structures may <u>only</u> be designed and/or inspected by an appointed professional engineer in order to receive a Certificate of Compliance, WPI-8 from TDI.

Relocated Structures

Certain relocated structures, as defined in the previous section of this document, must be inspected and certified by an appointed Texas licensed professional engineer in order to be certified by TDI as eligible for windstorm and hail coverage through TWIA.

Structures Requiring Engineer Design

The Texas Engineering Practice Act requires that certain structures be designed by a Texas licensed professional engineer. These structures shall also be inspected by an appointed Texas licensed engineer.

Engineered structures include:

- A. Non-residential and non-agricultural structures:
 - 1. having an area greater than 5,000 square feet,
 - 2. having more than one story, or
 - 3. having an unsupported clear span of greater than 24 feet.
- B. A public work with a contemplated completed construction cost greater than \$20,000 that does not involve structural, electrical, or mechanical engineering.
- C. A public work with a contemplated completed construction cost greater than \$8,000 that involves structural, electrical, or mechanical engineering.
- D. Apartments, condominiums, or townhouses:
 - 1. having over two stories,
 - 2. having two stories and over four units per building, or
 - 3. having one story and over eight units per building.

(A unit is defined as a group of rooms arranged as a private residence and permanently equipped for housekeeping.)

The Texas Engineering Practice Act also requires that repairs, alterations, or additions to engineered structures be designed by a Texas licensed professional engineer. These repairs, alterations, and additions shall also be inspected by an appointed Texas licensed engineer.

Design Requirements

Engineers shall design structures in compliance with the TWIA Plan of Operation building specifications. The structure's design to resist wind loading may be accomplished through the commingling of engineering analysis and prescriptive construction guidelines. The use of specific construction guidelines from a prescriptive construction document is permitted as long as the limitations specified in the prescriptive construction document for those construction guidelines are not exceeded. Design specifications for wood, concrete, masonry, steel and other materials used to design the structure shall be in accordance with the applicable standards referenced in the building specifications.

Continued on next page

July 2009

Inspection Procedure

The appointed Texas licensed professional engineer shall perform all inspections in accordance with Subchapter F of Chapter 2210 of the Texas Insurance Code and 28 Texas Administrative Code §5.4604.

The procedure is as follows:

- An appointed engineer shall submit Form WPI-1, Application for Certificate of Compliance, to the TDI BEFORE beginning to construct, alter, remodel, enlarge, or repair a structure. Failure to submit a timely application may result in a certification of compliance not being issued unless plans and calculations, testing information, manufacturer's installation instructions, or any other substantiating documentation required by the Commissioner is submitted to TDI.
- When all inspections for a given structure are complete, the appointed Texas licensed professional engineer shall submit to TDI Form WPI-2-BC (1, 2, 3, 4, or 5, as applicable), Inspection Verification form. A complete inspection will include windows, exterior doors, garage doors, skylights, windborne debris protection devices, exterior wall coverings, exterior roof coverings, and exterior mechanical equipment, when applicable.
- When only the foundation is designed and inspected by an appointed Texas licensed professional engineer, the engineer shall submit a Building Construction Compliance, Form WPI-2-BC (1, 2, 3, 4, or 5, as applicable). The foundation may be designed by a Texas licensed professional engineer and inspected by the TDI.
- When two or more structures are present at the same address, the Form WPI-1 and Form WPI-2 shall be specific about which structure was inspected.
 When repairs are being certified, the Form WPI-1 and Form WPI-2 shall be specific about which repairs were inspected.
- The appointed Texas license professional engineer shall keep on file complete sealed structural plans and calculations for the design of the structure to resist wind loading.

TDI Oversight

According to Title 28 TAC, Sec. 5.4604, random audits and random requests for submission of plans and calculations are allowed. TDI may perform random periodic audits of buildings or structures in the course of construction for which an Application for Windstorm Building Inspection has been submitted to TDI by an engineer. TDI may, at its discretion, require random submissions of sealed plans and calculations for buildings and structures which have been documented by the engineer as being in compliance with the wind loads of the construction standards adopted by the Commissioner.

Certificate of Compliance

TDI will issue and post on the TDI website Form WPI-8, Certificate of Compliance, when all paperwork has been submitted, processed and approved. Any file that has been entered/certified can be viewed and printed from TDI's website.

TDI Certification Requirements and Procedures

General

In order to be considered for windstorm and hail insurance through the Texas Windstorm Insurance Association (TWIA), <u>all</u> eligible structures erected, altered, and/or repaired, where construction started on or after January 1, 1988, must be inspected and deemed in compliance with the building specifications in the TWIA Plan of Operation. (Chapter 2210.251 and TAC 5.4602 other TAC rules). Structures may be inspected by either a Texas licensed professional engineer appointed by the Commissioner of Insurance to conduct inspections or by the Texas Department of Insurance (TDI).

The Texas Department of Insurance may inspect certain structures for compliance with the building specifications which have been adopted by the Commissioner of Insurance, which includes:

- structures that are erected in accordance with prescriptive construction guidelines, and
- certain structures that have been designed by a Texas licensed professional engineer.

Inspection Requirements

The Texas Department of Insurance may inspect a structure for compliance with the following:

- Prescriptive construction guidelines referenced in Section R301.2.1.1 of the *International Residential Code*. Requirements for basic wind speed, windborne debris and Building Exposure Category shall be in accordance with the IRC, including the Texas Revisions.
- Prescriptive construction guidelines referenced in Section 1609.1.1 of the International Building Code. Requirements for basic wind speed, windborne debris and Building Exposure Category shall be in accordance with the IBC, Texas Revisions.

Inspection Procedure

The appointed Texas licensed professional engineer shall perform all inspections in accordance with Texas Insurance Chapter 2210.251 and 28 Texas Administrative Code §5.4604.

The procedure for obtaining a TDI inspection for compliance with the building specifications is as follows:

- Form WPI-1, Application for Certificate of Compliance, shall be submitted to the Texas Department of Insurance **before** beginning to construct, alter, remodel, enlarge, or repair a structure (TIC Chapter 2210.251 (c)). Failure to submit a timely application may result in an appointed Texas licensed professional engineer performing the inspections rather than the Texas Department of Insurance, and/or a Form WPI-8, Certificate of Compliance, not being issued unless plans and calculations, testing information, manufacturer's installation instructions, or any other substantiating documentation required by the Commissioner is submitted to the Texas Department of Insurance.
- All inspections MUST BE MADE DURING THE CONSTRUCTION PHASE and shall be requested through the local Windstorm field office during normal business hours, which are 8:00 a.m. until 5:00 p.m., Monday through Friday, except on weekends, state and national holidays.
- During normal circumstances, when a request for inspection is received in the local field office, the inspection will be performed within 48 hours of the requested inspection date. (The 48 hour period shall not include Saturdays, Sundays, state and national holidays.) However, depending on the severity of a catastrophe, it may be necessary to schedule your inspection at least a week or more in advance. Questions concerning the timing of inspections, or construction guidelines, are to be directed to the appropriate field office.
- Upon completion of any inspection, the inspector will leave the Form WPI-7, Field Form, at the job site. The Form WPI-7, Field Form indicates the status of the inspection and whether or not an inspection was approved. It is also used to list all deficiencies if the structure does not pass the inspection.
- Important: All inspections need to be made during the construction phase TDI inspectors are unable to inspect a property after an inspection is completed.

Types of Inspections

Under normal circumstances, four separate categories of inspections will be necessary to determine compliance with the applicable building construction requirements. Inspections shall be requested prior to the installation of any type of covering, which would impede inspections. The four categories shall be as follows:

- Foundation
- Rough framing
- Final framing
- Mechanical inspection

Please contact the local windstorm field office or an engineer that has been appointed by TDI as a qualified inspector to discuss what items or areas will need to be inspected and when each inspection should occur.

Continued on next page

14

TDI Certification Requirements and Procedures, Continued

Types of Inspections, continued

Due to adopting of the IBC/IRC for windstorm resistant construction along the Texas coast, these categories will most likely need to be designed and evaluated by an engineer appointed by TDI as a qualified inspector.

Foundation

The following are the major items which might be examined during the foundation inspection:

Monolithic Slab on Grade Foundation:

- a. Reinforcement of slab
- b. Type of anchor bolts
- c. Placement of holddown anchors
- d. Dowels for masonry construction
- e. Offsets for masonry or masonry veneer walls (proper brick ledge), and
- f. Depth and width of grade beams.

Piling Foundation:

- a. Embedment of piles
- b. Size and spacing of piles
- c. Concrete piles properly reinforced
- d. Wood piles properly pressure treated
- e. Anchorage of beams to piles
- f. Size of beams
- g. Floor joist span, size, and spacing
- h. Anchorage of floor joists to beams, and
- i. Height of lowest horizontal structural member.

Pier and Beam Foundation:

- a. Proper size and depth of buried footings.
- b. Proper size of piers.
- c. Reinforcement of piers.
- d. Reinforced concrete or grout fill in hollow masonry units.
- e. Size of beams.
- f. Anchorage of sills or beams to piers, and piers to footings.
- g. Floor joist span, size, and spacing.
- h. Anchorage of floor joists to beams and/or sills.
- i. Treatment of beams and floor joists with wood preservative, where required.

Rough Framing

The following are the major items which might be examined during the rough framing inspection:

Floor Framing:

- a. Floor joist span, size, and spacing, and
- b. Floor decking type and application.

Wood Stud Wall Framing:

- a. Spacing of sole plate anchors in exterior and interior walls
- b. Proper size of washers
- c. Sole plate pressure treated
- d. Grade and species of lumber
- e. Size and spacing of studs
- f. Anchorage provided by framing anchors
- g. Anchorage of studs to plates (top and bottom)
- h. Construction and anchorage of headers
- i. Installation and location of lateral wall bracing
- j. Bracing of fireplace chimney
- k. Anchorage of second story to the first story, and Anchorage of beams, if required.

Masonry Walls:

- a. Size and spacing of vertical reinforcement
- b. Size and placement of bond beam reinforcement
- c. Length and locations of shearwalls
- d. Construction and span of lintels, and
- e. Masonry wall connections.

Ceiling Framing:

a. Bracing of gable endwall, if required.

Roof Framing:

- a. Roof joists or rafters (spans, sizes, and spacing)
- b. Bracing and anchoring of roof joists and rafters
- c. Installation of collar ties
- d. Anchorage of rafters and joists to top plate
- e. Roof truss design, construction, installation, and anchorage
- f. Roof decking type and application, and
- g. Fastening of roofing underlayment.

Miscellaneous:

- a. Construction of awnings, overhangs and porches
- b. Installation and design of windows and skylights, and
- c. Installation and design of exterior doors and garage doors.

TDI Certification Requirements and Procedures, Continued

Final Framing

The following are the major items which might be examined during the final framing inspection:

- a. Knee braces installed, if required by design
- b. Attachments to foundation below flood level
- c. Alterations in structural members
- d. Type and fastening of wall sheathing or other exterior wall finish
- e. Type and spacing of masonry anchors
- f. Application of roof covering
- g. Installation of roof vents
- h. Venting of attic space
- i. Installation / presence of windborne debris protection, if required, and
- j. Installation of gypsum wallboard, if required for shearwalls.

Mechanical

The major item which might be examined during the mechanical equipment inspection is anchorage of exterior air conditioner equipment. However, anchorage of any other exterior equipment, such as floodlights, turbine vents, propane tanks, swimming pool filters, water cooling towers, and satellite dishes will also be inspected.

TDI Certification Requirements and Procedures

Engineered Structures

TDI may inspect structures designed by an engineer provided that the following conditions are met.

Prior to the beginning of construction of a structure designed by an engineer, the following information must be submitted to the Texas Department of Insurance:

A set of plans and calculations, sealed by the Texas licensed professional engineer who designed the structure. The plans must include the wind load criteria used and must specify the basic wind speed used. Basic wind speeds must be in accordance with the building specifications in this document.

Form WPI-2D, Design Certification. This form must be sealed by the appointed Texas licensed professional engineer who designed the structure.

The Texas Department of Insurance will review the information and will make a determination as to whether the plans contain adequate information for the Texas Department of Insurance to conduct the inspections.

The Texas licensed professional engineer shall keep on file complete sealed structural plans and calculations for the design of the structure to resist wind loading.

The Texas Department of Insurance will inspect the construction of the structure for compliance with the submitted design drawings. If the structure deviates from the information presented on the design drawings, then the Texas Department of Insurance will require the submission of a written and sealed variance from the Texas licensed professional engineer who designed the structure. A complete inspection will include windows, exterior doors, garage doors, skylights, windborne debris protection devices, foundation, framing, exterior wall coverings, exterior roof coverings, and exterior mechanical equipment, when applicable.

Certificate of Compliance

A Form WPI-8, Certificate of Compliance, is issued and posted on the TDI website after all applicable inspections related to the type of construction have been approved, and all paperwork has been submitted.