



County of San Diego

BUILDING PERMIT & RIGHT-OF-WAY PERMIT SUBCONTRACTOR DISCLOSURE GUIDANCE

The County of San Diego Board of Supervisors adopted new [Subcontractor Disclosure Ordinances](#) to promote transparency for building permits and right-of-way (ROW) permits by requiring contractors to disclose subcontractor information for subcontractors working on projects permitted by the County of San Diego. In requiring disclosure of subcontractors, the County's goal is to create a culture of safety and legal compliance while ensuring that labor standards are upheld.

As of June 10, 2022, after permit issuance, but prior to start of construction, lead contractors are required to disclose information for their subcontractors working on the following project types that require building permits (Planning & Development Services) and right-of-way permits (Department of Public Works):

Subcontractors Disclosure are required for the following types of projects:

Planning & Development Services (PDS)

- New Commercial Buildings
- Residential Tract Developments (five or more lots)
- Multi-family Dwelling Units (five or more units)
- Commercial Tenant Improvements (renovation) projects that affect more than 10,000 square feet

Department of Public Works (DPW)

- Construction Permits (excluding residential driveways and retaining walls)
- Excavation Permits
- Small Cell Wireless Permits
- Traffic Control Permits

This guidance document is intended to help applicant fill out the [Subcontractor Disclosure form \(PDS-294\)](#) for Building Permit and Right-of-Way Permit with details on what type of information, and what level of information required to be disclosed. County building and right-of-way permitting staff can also provide additional guidance on filling out and submitting the form at (858) 495-5382 or PDS.BuildingServices@sdcounty.ca.gov.

Transparency created by the new Subcontractor Disclosure Ordinances can also help identify labor violators and unqualified operators and ensure accountability. The new Office of Labor Standards and Enforcement (OLSE) serves as the central location for education and resources for employers and their workers, undertakes research and data analysis regarding worker issues, and pursues enforcement measures to protect workers. To file a complaint based on Subcontractor Disclosure Ordinances, please call the OLSE Complaint Hotline at: (619) 531-5129 or OLSE@sdcounty.ca.gov.

GUIDANCE FOR SUBCONTRACTOR DISCLOSURE FORM (PDS-294)

SECTION 1: PROJECT SITE IDENTIFICATION

This section of the form is intended to identify Building Permit and Right-of-Way Permit types subject to the subcontractor disclosure. If you have any of the project types noted below, continue to complete the Subcontractor Disclosure Form. This section includes project site details like the assigned Record ID for the Building or Right-of-Way Permit, Responsible Party Listed as Applicant or Lead Contractor, as well as the Owner Listed on Application. The Licensed Lead Contractor will acknowledge all information provided is true to the best of my knowledge at the time of this submittal. Pursuant to County Code of Regulatory Ordinance, this information is required PRIOR to any subcontractor performing any work on site.

APPLICANT OR LEAD CONTRACTOR TO COMPLETE THIS PAGE	
<p>Planning & Development Services Building Permit Subcontractor Disclosures are required for the following types of projects:</p> <ul style="list-style-type: none"> All new commercial construction projects, residential tract developments (five or more lots), and multifamily construction projects (5 or more units) Commercial tenant improvement (renovation) projects that affect more than 10,000 square feet of space under the renovation 	
<p>Department of Public Works Right-of-Way Permit Subcontractor Disclosures are required for the following types of projects:</p> <ul style="list-style-type: none"> All projects in the right-of-way (excluding residential driveways and retaining walls) All projects in the right-of-way to provide transport of energy, water, or sewer 	
<p>If you have any of the project types noted above, continue to complete the Subcontractor Disclosures noted below. Pursuant to County Code of Regulatory Ordinance, this information is required PRIOR to any subcontractor performing any work on site (see PDS-295 for additional requirements and direction on submitting subcontractor disclosure).</p>	
PROJECT SITE IDENTIFICATION	
Record ID for Building or Right-Of-Way Permit	
Responsible Party Listed as Applicant or Lead Contractor:	
Owner Listed on Application:	
<p>LICENSED LEAD CONTRACTOR SUBCONTRACTOR DECLARATION – I acknowledge all information provided is true to the best of my knowledge at the time of this submittal.</p>	
Signature:	Date:

SECTION 2: SUBCONTRACTOR DECLARATION

This section of the form is intended to collect more detailed information for each subcontractor. It will provide guidance on what type of information and what level of detail is required for each disclosure area. Additional subsections are noted below.

SUBCONTRACTOR #1 DISCLOSURE TO BE COMPLETED BY LEAD CONTRACTOR			
CALIFORNIA LICENSED SUBCONTRACTOR INFORMATION			
Subcontractor Name:			
License #:			
Workers Comp Policy:			
Type of Contractor:	- select -		
Address:			
City:	State:	Zip:	Business Phone #:
Email:			
Work Completed by Subcontractor:			
	Start Date:	End Date:	
Additional Subcontractor Information:	# of Cal OSHA Violations ⁽¹⁾ in last 7 years	- select -	All required Special safety licenses and/or training requirements have been completed <input type="checkbox"/> Yes <input type="checkbox"/> No
	# of Wage Violations ⁽²⁻³⁾ in last 7 years	- select -	Disadvantaged Business Enterprise (DBE) status <input type="checkbox"/> Yes <input type="checkbox"/> No
Your Name, First & Last:			Date:

GUIDANCE FOR SUBCONTRACTOR DISCLOSURE FORM (PDS-294)

SECTION 2 - ITEM 1: SUBCONTRACTOR INFORMATION

This section of the form is intended to collect the California licensed subcontractor's information starting with the numeric value for the subcontractor. The first page provides the pre-selected option for the first subcontractor (Subcontractor #1) while the second page provides spaces for numeric values and could be repeated as necessary to capture all subcontractors used on any given project. This section also includes the following options:

The following California licensed subcontractor's information is required:

- “Subcontractor Name” section is intended for the subcontractor's legal business name recognized by the State of California and listed on the licensing board.
- “License #” section is intended to capture a valid issued license number (numeric values only) assigned by the California State Licensing Board.
- “Workers Comp Policy” section is intended for subcontractor's valid and active workers compensation policy provider as well and policy number. If you are exempt from this section, please provide additional explanation for your exemption based on the State License Board requirements.
- “Type of Contractor” section is intended as a dropdown option for the valid subcontractor's class (alpha value like “C-10”) assigned by the California State Licensing Board (CSLB). The following CSLB recognized license types are available in the drop-down options:
 - A - General Engineering Contractor
 - B - General Building Contractor
 - B-2 - Residential Remodeling Contractor
 - C - Specialty Contractor
 - C-2 - Insulation and Acoustical Contractor
 - C-4 - Boiler, Hot Water Heating and Steam Fitting Contractor
 - C-5 - Framing and Rough Carpentry Contractor
 - C-6 - Cabinet, Millwork and Finish Carpentry Contractor
 - C-7 - Low Voltage Systems Contractor
 - C-8 - Concrete Contractor
 - C-9 - Drywall Contractor
 - C-10 - Electrical Contractor
 - C-11 - Elevator Contractor
 - C-12 - Earthwork and Paving Contractors
 - C-13 - Fencing Contractor
 - C-15 - Flooring and Floor Covering Contractors
 - C-16 - Fire Protection Contractor
 - C-17 - Glazing Contractor
 - C-20 - Warm-Air Heating, Ventilating and Air-Conditioning Contractor
 - C-21 - Building Moving/Demolition Contractor
 - C-22 - Asbestos Abatement Contractor
 - C-23 - Ornamental Metal Contractor
 - C-27 - Landscaping Contractor
 - C-28 - Lock and Security Equipment Contractor
 - C-29 - Masonry Contractor
 - C-31 - Construction Zone Traffic Control Contractor
 - C-32 - Parking and Highway Improvement Contractor
 - C-33 - Painting and Decorating Contractor
 - C-34 - Pipeline Contractor
 - C-35 - Lathing and Plastering Contractor
 - C-36 - Plumbing Contractor
 - C-38 - Refrigeration Contractor
 - C-39 - Roofing Contractor

- C-42 - Sanitation System Contractor
- C-43 - Sheet Metal Contractor
- C-45 - Sign Contractor
- C-46 - Solar Contractor
- C-47 - General Manufactured Housing Contractor
- C-50 - Reinforcing Steel Contractor
- C-51 - Structural Steel Contractor
- C-53 - Swimming Pool Contractor
- C-54 - Ceramic and Mosaic Tile Contractor
- C-55 - Water Conditioning Contractor
- C-57 - Well Drilling Contractor
- C-60 - Welding Contractor
- C-61 - Limited Specialty
- Other

- Additional subcontractor’s address section can be used to provide: “Address”, “City”, “State”, “Zip” code, “Business Phone #”, and “Email” for the individual subcontractor.

SUBCONTRACTOR #1 DISCLOSURE TO BE COMPLETED BY LEAD CONTRACTOR						
CALIFORNIA LICENSED SUBCONTRACTOR INFORMATION						
Subcontractor Name:						
License #:						
Workers Comp Policy:						
Type of Contractor:	- select -					
Address:						
City:		State:		Zip:		Business Phone #:
Email:						

SECTION 2 - ITEM 2: SUBCONTRACTOR INFORMATION (CONTINUED)

This section of the form is intended to collect additional California licensed subcontractor’s information. This section includes the following required fields:

- “Work Completed by Subcontractor” section is intended to provide a detailed scope of work to capture the exact work performed by the subcontractor on the project. Examples can include “framing for structural support for units 5-10 of the master tract development and work excludes fine framing for doors/windows” or “electrical underground work for wireless communication facilities through 300’ of open trenching, traffic control, and work excludes pavement restoration”. The more detail is provided, the better the quality of information, which avoids future need for changes to the disclosure.
- “Start Date” and “End Date” section is intended to capture the start (subcontractor contract signing date) and end dates (estimated completion) for the specialty subcontractor performing the detailed scope of work. If the project is multi phases, this information can be specific to the individual phases. This information is provided after permit issuance but is required prior to the start of the construction and can be changed or amended during the construction cycle.

Work Completed by Subcontractor:		
Start Date:		End Date:

SECTION 2 - ITEM 3: SUBCONTRACTOR INFORMATION (CONTINUED)

This section of the form is intended to collect additional California licensed subcontractor’s information. This section includes the following re quired fields:

- “# of CalOSHA/OSHA Violations in last 7 years” section is intended to capture the number of CalOSHA/OSHA violations within the last seven (7) calendar years. Examples of violations include contractor/subcontractor issued CalOSHA/OSHA citation, special order, or an order to take special action after investigation of hazards in a workplace. Additional information about these types of violations categories can be found on the CalOSHA and OSHA websites. The following options are available from the drop-down menu:
 - 0
 - 1-3
 - 4-10
 - 10+
- “# of Wage Violations in last 7 years” section is intended to capture the number of wage violations within the last seven (7) calendar years. Examples of wage violations include if contractor/subcontractor was issued DLSE/CLC Order, Decision or Award finding violation of the California Labor Code. Additional examples of wage violations include if contractor/subcontractor issued Wage and Hour Division administrative finding or successfully prevailed in a lawsuit for violating the Fair Labor Practices Act. Additional information about these types of violations categories can be found on the DLSE/CLC, California Labor Code, and Fair Labor Practices Act websites. The following options are available from the drop-down menu:
 - 0
 - 1-3
 - 4-10
 - 10+
- “All required Special safety licenses and/or training requirements have been completed” section is intended for the validation that any special safety and/or specialty training required to perform the subcontractor specialty work or any portions of the detailed scope of work on the project has been completed by those performing the work under the disclosed contactor/subcontractor.
- “Disadvantaged Business Enterprise (DBE) status” section is intended to capture if the contactor/subcontractor participates in this Department of Transformation program designed to remedy discrimination for certain public work type of projects.

Additional Subcontractor Information:	# of Cal OSHA Violations ⁽¹⁾ in last 7 years	- select -	All required Special safety licenses and/or training requirements have been completed	<input type="checkbox"/> Yes <input type="checkbox"/> No
	# of Wage Violations ⁽²⁻³⁾ in last 7 years	- select -	Disadvantaged Business Enterprise (DBE) status	<input type="checkbox"/> Yes <input type="checkbox"/> No

SECTION 2 - ITEM 4: SUBCONTRACTOR INFORMATION (CONTINUED)

This section of the form is intended to collect information on the individual providing the subcontractor disclosure form including: “Your Name, First & Last” along with the “date” that the form is completed.

Your Name, First & Last:		Date:	
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