

MEMORANDUM

TO: District Superintendents
District Facilities Managers

FROM: Wayne Stokes
Director, Office of School Facilities

DATE: July 28, 2026

RE: Reminder - Occupancy of School Facilities Prior to OSF Approval

The SC Department of Education (SCDE), Office of School Facilities (OSF), would like to remind districts of the requirements related to occupancy of school facilities undergoing construction, renovation, alteration, or modular building installation.

To help ensure the safety of students, staff, visitors, and construction personnel, school facilities may not be occupied until all required inspections have been completed and a Certificate of Approval (CA) has been issued by OSF. Recently, OSF has become aware of situations in which individuals have entered or used facilities prior to the issuance of the required approval. This reminder is intended to reinforce existing requirements and support districts in maintaining safe, code-compliant environments.

Pursuant to SC Code § 59-23-220, all public school construction, improvement, and renovation projects must be inspected for compliance with applicable codes and standards. A Certificate of Approval must be issued by the State Superintendent of Education or the Superintendent's designee before a building may be occupied. OSF serves as the Superintendent's designee for this purpose.

Section 2.8.G of the OSF Policy and Procedure Manual states: *The district **must** obtain a written Certificate of Approval from the OSF **before occupancy** of a school building is permitted. Before the Certificate can be issued, the following conditions **must be met**:*

- 1. The design professional has verified the work is substantially complete.*
- 2. The OSF has inspected the work and concurs with the design professional that the work is substantially complete, and all life safety systems are operating as required*

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by the code. Additionally, all areas of the building and site are free of any apparent life safety hazard and egress is not compromised.

3. *The design professional, district and the OSF have agreed to a date for project close out.*

Section 111.1 of the 2021 South Carolina Building Code prohibits occupancy or use of a building, in whole or in part, until the required Certificate of Occupancy (SCDE/OSF Certificate of Approval) has been issued.

Until a Certificate of Approval is issued, the facility remains an active construction site and should be accessed only by individuals directly involved in construction, inspection, testing, commissioning, or other project-related activities.

Examples of activities that should not occur prior to approval include:

- Open houses
- Ribbon-cutting events
- Student visits or orientations
- Parent or community tours
- Classroom setup by teachers or staff
- Faculty meetings
- Professional development activities
- Equipment move-in by school personnel
- Training sessions
- Any other non-construction use of the facility

OSF recognizes that, in some circumstances, districts may wish to host activities outside of the building prior to issuance of the Certificate of Approval. Such events may be appropriate on a case-by-case basis when coordinated with the contractor, construction manager, and project design team to ensure site safety, compliance with applicable requirements, and appropriate separation from active construction areas.

Districts are reminded that the project remains an active construction site until final approval is issued. Chapter 33 of the 2021 SC Building Code (Safeguards During Construction) requires safeguards to protect the public during construction activities. Any outdoor event held on school grounds during construction should be coordinated with the contractor to ensure compliance with Chapter 33 safeguards, life-safety protections are maintained, emergency access is preserved, and attendees are protected from construction-related hazards. Occupancy or use of any portion of the building itself

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remains prohibited until all required OSF approvals have been issued pursuant to SC Code § 59-23-220 and applicable building code requirements.

Thank you for your continued partnership and commitment to providing safe, high-quality learning environments for South Carolina's students and educators. If you have questions regarding OSF policies or project occupancy requirements, please contact your assigned OSF representative using the [Office of School Facilities Statewide District Assignment Map](#)