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MEMORANDUM

TO: CALIFORNIA ENERGY COMMISSION

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SUBJECT: PROPOSED UPDATES TO ATTCP REQUIREMENTS FOR THE 2028 ENERGY CODE

DATE: MAY 29, 2026

Introduction

This memorandum identifies staff proposals for revising Chapter 10 of the California Building Standards Code (Title 24, Part 1), Sections 10-103.1 and 10-103.2 in the 2028 California Energy Code. These proposals are aimed at improving clarity, consistency, training quality and overall functionality for the Acceptance Test Technician Certification Provider (ATTCP) program. These measures propose no changes to the Title 24, Part 6 requirements for any building type or system. These measures only apply to the administration of the ATTCP program. Together, these revisions attempt to streamline terminology, improve accountability, improve accuracy, support flexible and future-proof data transfer methods, and enhance the overall efficiency of reporting and compliance processes. The proposed changes are administrative in nature and are intended to strengthen program operations without creating new burdens for stakeholders.

A total of six measures are included, each of which is discussed below:

1. Revise Section 10-103.2(c)3Bi to include cooling towers, multifamily field verification and diagnostic testing, and add references for Energy Code sections for the mechanical acceptance testing procedures to Acceptance Test Technician (ATT) training requirements.
2. Revise Sections 10-103.1(c)3Gii and 10-103.2(c)3Gii to include the ATT or Acceptance Test Employer (ATE) service territory.
3. Revise Sections 10-103.1(c)3Hiii and 10-103.2(c)3Hiii to require ATTCPs to produce an Acceptance Test Summary Report.
4. Remove language in Sections 10-103.1(c)3Hv and 10-103.2(c)3Hv referring to development of an application programming interface (API).

5. Revise Sections 10-103.1(d) and 10-103.2(d) requirements to align better with the Annual Report Data Template/ Guidance Letter and add a deadline of March 31 of each year for annual report submission to the CEC.
6. Revise the definition of substantive and nonsubstantive change in Sections 10-103.1(f)1A and 1B and 10-103.2(f)1A and 1B.

AB130 Impact

AB130 became effective June 30, 2025, and enacted a moratorium on state building standards affecting residential units (Residential Group R occupancies) beginning October 1, 2025, and ending June 1, 2031. The measures proposed in this memorandum do not include any additional energy efficiency requirements or compliance requirements for Residential Group R occupancies.

Measure Detailed Overview

1. **MEASURE NAME:** Revise Section 10-103.2(c)3Bi to include cooling towers, multifamily field verification and diagnostic testing, and add references for Energy Code sections for the mechanical acceptance testing procedures to Acceptance Test Technician (ATT) training requirements.

Building Type and Building System

This measure proposes no direct changes to Part 6 requirements for any building type or system. The measure applies to the management of the ATTCP program which provides a compliance pathway for nonresidential buildings, multifamily buildings, and hotels or motels.

Measure Description (Purpose)

The purpose of this change is to make several code corrections to the ATT mechanical training curriculum. These corrections would require ATTCPs to add cooling towers and multifamily field verification and diagnostic testing requirements to their training curriculum. Additionally, the proposed changes will also include in the curriculum direct references to sections for the mechanical acceptance testing procedures (previously omitted in error).

Justification (Necessity)

This addition is necessary to correct a previous oversight and does not constitute any substantive change to the Energy Code requirements.

Data Needs

There is no new data needed for this change.

Key Stakeholders

The primary stakeholders include Mechanical ATTCPs.

Estimated Energy Savings

Staff expect there to be no direct energy savings associated with this proposal.

Estimated Costs

Staff expect there to be no costs associated with this proposal.

Economic Impacts

Staff expect there to be no meaningful economic impact associated with this proposal.

Proposed Language Changes

Section: 10-103.2(c)3Bi

- i. **Curricula.** ATTCP training curricula for ATTs shall include, but not be limited to, the analysis, theory, and practical application of the following:
 - a. Constant volume system controls;
 - b. Variable volume system controls;
 - c. Air-side economizers;
 - d. Air distribution system leakage;
 - e. Demand controlled ventilation with CO2 sensors;
 - f. Demand controlled ventilation with occupancy sensors;
 - g. Automatic demand shed controls;
 - h. Hydronic valve leakage;
 - i. Hydronic system variable flow controls;
 - j. Supply air temperature reset controls;
 - k. Condenser water temperature reset controls;
 - l. Outdoor air ventilation systems;
 - m. Supply fan variable flow controls;
 - n. Boiler and chiller isolation controls;
 - o. Fault detection and diagnostics for packaged direct-expansion units;
 - p. Automatic fault detection and diagnostics for air handling units and zone terminal units;
 - q. Distributed energy storage direct-expansion air conditioning systems;
 - r. Thermal energy storage systems;
 - s. Conductivity controls and overflow alarms for open and closed-circuit cooling towers;
 - st. Building Energy Efficiency Standards mechanical acceptance testing procedures per Section 401.2.7 [Section 120.5], Section 403.2.3.5 [Section 160.3(d)] and field verification and diagnostic testing allowed per Reference Appendices Section NA1.9; and
 - tu. Building Energy Efficiency Standards acceptance testing compliance documentation for mechanical systems.

- 2. MEASURE NAME:** Revise Sections 10-103.1(c)3Gii and 10-103.2(c)3Gii to include the ATT or Acceptance Test Employer (ATE) service territory.

Building Type and Building System

This measure proposes no direct changes to the Part 6 requirements for any building type or system. The measure applies to the management of the ATTCP program and the certified ATTs that provide a compliance pathway for nonresidential buildings, multifamily buildings, and hotels or motels.

Measure Description (Purpose)

The purpose of this addition is to require each approved ATTCP to include the service territory of each of its certified ATTs/ATEs as part of their public record. This allows the enforcement agencies and the public to search for qualified ATTs/ATEs by geography.

Justification (Necessity)

This addition is necessary to help the public efficiently and consistently locate certified ATTs/ATEs in their service territory.

AB130 Impact

This proposal is outside the scope of AB130 because it does not include any additional energy efficiency requirements or compliance requirements for Residential Group R occupancies.

Data Needs

ATTCPs would need to collect additional data, specifically the service area of their ATTs/ATEs to publish on their websites.

Key Stakeholders

The key stakeholders will be ATTCPs, ATTs/ATEs, enforcement agencies, building owners, contractors, designers, training and workforce development, and the public.

Estimated Energy Savings

Staff expect there to be no direct energy savings associated with this proposal.

Estimated Costs

Staff expect there to be a minimal cost impact to the ATTCPs to update their website to display ATT/ATE territory. Discussions with the ATTCPs indicate most have already implemented this change.

Economic Impacts

This proposal may improve compliance by allowing enforcement agencies and the public a pathway to find qualified ATTs available to service their location. It may encourage competition and help identify underserved areas that can receive further support and better deployment of training and other resources.

Proposed Language Changes

Section: 10-103.1(c)3Gii

- G. Certification Identification Number and Verification of ATT and ATE Certification Status. The ATTCP shall describe in its application to the Energy Commission its procedures for recording, tracking, and communicating certification status, including but not limited to the following:
- i. Upon certification of an ATT or ATE, the ATTCP shall issue a unique certification identification number to the ATT or ATE.
 - ii. The ATTCP shall maintain an accurate public record of the certification status and service territory for all ATTs and ATEs that the ATTCP has certified, including any ATTs or ATEs who have been decertified as specified in Section 10-103.1(c)3E. Service territory is defined to be that area where the ATT/ATEs are willing to provide acceptance testing services. Undeclared service area will default to the contact address of the ATT/ATE.

Section: 10-103.2(c)3Gii

G. Certification Identification Number and Verification of ATT and ATE Certification Status. The ATTCP shall describe in its application to the Energy Commission its procedures for recording, tracking, and communicating certification status, including but not limited to the following:

- i. Upon certification of an ATT or ATE, the ATTCP shall issue a unique certification identification number to the ATT or ATE.
- ii. The ATTCP shall maintain an accurate public record of the certification status and service territory for all ATTs and ATEs that the ATTCP has certified, including any ATTs or ATEs who have been decertified as specified in Section 10-103.2(c)3E. Service territory is defined to be that area where the ATT/ATEs are willing to provide acceptance testing services. Undeclared service area will default to the contact address of the ATT/ATE.

3. MEASURE NAME: Revise Sections 10-103.1(c)3Hiii and 10-103.2(c)3Hiii to require ATTCPs to produce an Acceptance Test Summary Report.

Building Type and Building System

This measure proposes no direct changes to the Part 6 requirements for any building type or system. The measure applies to the management of the ATTCP program which provides a compliance pathway for nonresidential buildings, multifamily buildings, and hotels or motels.

Measure Description (Purpose)

The purpose of this addition is to require each approved ATTCP to generate a project specific Acceptance Test Summary Report (ATSR) and to provide enforcement agency access to view ATSRs and all ATTCP tracked projects within their jurisdictions. This will provide a comprehensive status of all the Certificate of Acceptance tests required for each project and will verify the documents were recorded in the ATTCP's database.

Justification (Necessity)

This addition is necessary to improve the authenticity check of the mechanical and lighting controls Nonresidential Certificate of Acceptance (NRCA) compliance documents using a single document and to make it easier for enforcement agencies to verify that all NRCA compliance documents for a project have been completed. It also reduces fraud risk and accelerates enforcement agency review.

AB130 Impact

This proposal is outside the scope of AB130 because it does not include any additional Part 6 requirements for Residential Group R occupancies. The Part 1 requirements would still apply to multifamily and hotels/motels.

Data Needs

There is no new data needed for this change.

Key Stakeholders

The stakeholders include ATTCPs, enforcement agencies, ATTs/ATEs, and builders and building owners.

Estimated Energy Savings

Staff expect there to be no direct energy savings associated with this proposal.

Estimated Costs

There may be an administrative cost to the ATTCPs to update their database to be able to produce the ATSR document. However, many ATTCPs, including smaller ATTCPs, have already adopted a report similar to the proposed ATSR on a voluntary basis and discussions with the ATTCPs indicate that costs to produce the ATSR document would be minimal.

Economic Impacts

Staff expect there to be no meaningful economic impact associated with this proposal.

Proposed Language Changes

Section: 10-103.1(c)3Hiii

- H. **Electronic Database System.** The ATTCP shall maintain, or by suitable contractual requirements cause to be maintained, an electronic database system approved by the Energy Commission. The electronic database system shall be capable of all the following:
- i. Support all activities for the ATTCP to comply with its quality assurance program as required by Section 10-103.1(c)3F.
 - ii. For no less than five years, record and preserve all certificates of acceptance offered for certification by the ATTCP and as performed by its own certified ATTs.
 - iii. Allow the transmission of electronic copies of each completed certificate of acceptance to the ATT that performed the test, the ATE associated with that ATT, or both.
 - a. Each page of each certificate of acceptance shall bear the logo of the ATTCP or other identifying insignia as approved by the Energy Commission.
 - b. The electronic copy shall be capable of being printed.
 - c. The ATTCP may apply to the Energy Commission for approval to use alternative compliance documents that differ from those approved for use by the Energy Commission but must demonstrate that these alternative compliance documents do not differ in format, informational order, or content from approved compliance documents.
 - d. The ATTCP shall prepare an Acceptance Test Summary Report (ATSR) that provides a comprehensive summary of the status of all certificates of acceptance required for a project. The report shall include all the following:
 - i. The report shall display the ATTCP's official logo or another identifying insignia authorized by the Energy Commission.
 - ii. Furthermore, the report shall include a digital label that can be scanned to verify that the certificates of acceptance were recorded through the ATTCP database.
 - iii. The ATTCP shall also provide access to enforcement agencies to view all projects within their jurisdictions, and access to the ATSR for each of those projects.
 - iv. A list of all required acceptance tests for each project and completion status.

- H. **Electronic Database System.** The ATTCP shall maintain, or by suitable contractual requirements cause to be maintained, an electronic database system approved by the Energy Commission. The electronic database system shall be capable of all the following:
- i. Support all activities for the ATTCP to comply with its quality assurance program as required by Section 10-103.2(c)3F.
 - ii. For no less than five years, record and preserve all certificates of acceptance offered for certification by the ATTCP and as performed by its own certified ATTs.
 - iii. Allow the transmission of electronic copies of each completed certificate of acceptance to the ATT that performed the test, the ATE associated with that ATT, or both.
 - a. Each page of each certificate of acceptance shall bear the logo of the ATTCP or other identifying insignia as approved by the Energy Commission.
 - b. The electronic copy shall be capable of being printed.
 - c. The ATTCP may apply to the Energy Commission for approval to use alternative compliance documents that differ from those approved for use by the Energy Commission but must demonstrate that these alternative compliance documents do not differ in format, informational order, or content from approved compliance documents.
 - d. The ATTCP shall prepare an Acceptance Test Summary Report (ATSR) that provides a comprehensive summary of the status of all certificates of acceptance required for a project. The report shall include all the following:
 - i. The report shall display the ATTCP's official logo or another identifying insignia authorized by the Energy Commission.
 - ii. Furthermore, the report shall include a digital label that can be scanned to verify that the certificates of acceptance were recorded through the ATTCP database.
 - iii. The ATTCP shall also provide access to enforcement agencies to view all projects within their jurisdictions, and access to the ATSR for each of those projects.
 - iv. A list of all required acceptance tests for each project and completion status.

4. **MEASURE NAME:** Remove language in Sections 10-103.1(c)3Hv and 10-103.2(c)3Hv referring to development of an application programming interface (API).

Building Type and Building System

This measure proposes no direct changes to Part 6 requirements for any building type or system. The measure applies to the management of the ATTCP program, which provides a compliance pathway for nonresidential buildings, multifamily buildings, and hotels or motels.

Measure Description (Purpose)

The purpose of this change is to replace the reference to 'Application Programming Interface (API)' with technology-neutral language which allows flexibility for future transferring of data from the ATTCP databases to the Energy Commission.

Justification (Necessity)

This revision is necessary to provide timely and consistent electronic reporting of project data from the ATTCPs to the Energy Commission without delay or dependency on provider specific formats.

AB130 Impact

This proposal is outside the scope of AB130 because it does not include any additional Part 6 requirements for Residential Group R occupancies.

Data Needs

There is no new data needed for this change.

Key Stakeholders

The stakeholders include Mechanical and Lighting Controls ATTCPs and Energy Commission staff.

Estimated Energy Savings

Staff expect there to be no direct energy savings associated with this terminology change.

Estimated Costs

Since the ATTCPs and the Energy Commission have not begun to implement any means of data transfer, staff expect there to be no additional costs associated with this terminology change.

Economic Impacts

Staff expect there to be no meaningful economic impact associated with this terminology change.

Proposed Language Changes

Section: 10-103.1(c)3Hv and 10-103.2(c)3Hv

- v. Provide the Energy Commission with any of the following project data or documents upon request: project address, permit numbers, acceptance test technician and acceptance test employee certification numbers, certificates of acceptance, compliance forms, installation forms, and record of quality assurance review. The Energy Commission may adopt an Application Programming Interface (API) for providing data electronically. Within one year of development of an API, the ATTCP's electronic database system shall have the ability to transfer project data to the Energy Commission through the API upon completion of the project or at established intervals no longer than monthly. The Energy Commission may approve a standardized electronic data transfer mechanism. Within one year of its approval, the ATTCP's electronic database system shall be capable of sending project information through this mechanism at project completion or at intervals not exceeding one month.

- 5. MEASURE NAME:** Revise Sections 10-103.1(d) and 10-103.2(d) requirements to align better with the Annual Report Data Template/ Guidance Letter and add a deadline of March 31 of each year for annual report submission to the CEC.

Building Type and Building System

This measure proposes no direct changes to the Part 6 requirements for any building type or system. The measure applies to the administration and oversight of the ATTCP program which

provides a compliance pathway for nonresidential buildings, multifamily buildings, and hotels or motels.

Measure Description (Purpose)

The purpose of this addition is to clearly define the level of detail and structure requested for the annual report requirements for the ATTCPs. This change also establishes a codified deadline for ATTCPs to submit the required annual report to the Energy Commission. Adding a date to the code removes ambiguity, standardizing expectations across providers, supporting consistent planning and timely reporting.

Justification (Necessity)

This addition is necessary to standardize ATTCP annual reporting that the CEC relies on for compliance verification, program oversight and future data analysis across all ATTCPs. Current regulations lack clarity regarding the required level of detail in each of the reporting categories, leading to inconsistent submittals by ATTCPs. The CEC has been providing Annual Report Guidance Letters to address this gap. This update is needed to support compliance verification and program oversight. This modification allows for flexibility for technological changes or for providers using different internal data systems.

The addition of a deadline for the annual reports is necessary to improve ATTCP program oversight, support consistent compliance, and provide adequate time for staff to review annual activity while conducting quality assurance follow up.

AB130 Impact

This proposal is outside the scope of AB130 because it does not include any additional Part 6 requirements for Residential Group R occupancies.

Data Needs

There are no additional data needs. This clarification simply standardizes the annual report information the CEC already receives from ATTCPs.

Key Stakeholders

The key stakeholders include ATTCPs and the Energy Commission staff.

Estimated Energy Savings

Staff expect there to be no direct energy savings associated with this proposal.

Estimated Costs

Staff expect there to be no costs associated with this proposal.

Economic Impacts

Staff expect there to be no meaningful economic impact associated with this proposal.

Proposed Language Changes

Section: 10-103.1(d)

(d) Requirements for ATTCPs to Provide Regular Reports. The ATTCP shall provide the following regular reports to the Energy Commission:

1. **Annual Report.** The ATTCP shall provide an annual report to the Energy Commission that includes the following:

A. ~~A summary of the certification services provided over the reporting period, including the total number of Acceptance Test Technicians and Employers certified by the agency during the reporting period and to date.~~

B. ~~A summary of all actions taken against any ATT or ATE as a result of the complaint or quality assurance procedures described by the ATTCP as required under Section 10-103.1(c)3D and 10-103.1(c)3F.~~

- ~~C. A summary of the quality assurance and accountability activities conducted over the reporting period, including the compliance forms reviewed and the on-site audits performed as required under Section 10-103.1(c)3Fii during the reporting period and to date.~~
- ~~D. A summary of the number and type of acceptance tests performed in each local jurisdiction over the reporting period and to date.~~
- ~~E. A signed certification to the Energy Commission that the ATTCP continues to meet the requirements of Section 10-103.1.~~
- A. Certification Services. A summary of the certification services provided during the reporting period, including:
 - i. The number of Acceptance Test Technicians (ATTs) and Acceptance Test Employers (ATEs) newly certified.
 - ii. The Certification IDs renewed, inactive, suspended, or decertified;
 - iii. Total certifications held to date and latest code cycle certified; and
 - iv. Any additional information necessary to report certification activity.
- B. Disciplinary Actions. A summary of all actions taken against any ATT or ATE as a result of complaints or quality assurance procedures conducted pursuant to Sections 10-103.1(c)3D and 10-103.1(c)3F. The summary shall include:
 - i. Description of the ATTCP's approved complaint and quality assurance procedures, as applicable to the actions taken and sufficient to understand the type of action;
 - ii. The general nature and source of each complaint or quality assurance finding;
 - iii. The ATT or ATE involved; and
 - iv. The status or resolution of each action.
- C. Quality Assurance and Accountability. A summary of the quality assurance and accountability activities conducted during the reporting period and to date, as required under Section 10-103.1(c)3F, including for each ATT:
 - i. The number of each type of acceptance test completed;
 - ii. The number of desk audits, on-site audits, and failed audits; and
 - iii. Aggregate totals.
- D. Acceptance Testing Data. A summary, per project, of the number and types of acceptance tests performed in each local jurisdiction during the reporting period and to date. The summary shall, at minimum, identify:
 - i. The jurisdiction, project address, permit number;
 - ii. The acceptance test type; and
 - iii. The number of tests completed.

E. Certification Statement.

- i. A signed statement by an authorized representative of the ATTCP certifying that the ATTCP continues to meet all requirements of Section 10-103.1.

F. Form and Manner of Submittal.

- i. The annual report shall be submitted to the Energy Commission by March 31 of the calendar year immediately following the reporting period.
- ii. The Commission may make available recommended formats, templates, or electronic reporting tools to support consistent, accurate, and efficient reporting.

Section: 10-103.2(d)

- (d) Requirements for ATTCPs to Provide Regular Reports. The ATTCP shall provide the following regular reports to the Energy Commission:

1. **Annual Report.** The ATTCP shall provide an annual report to the Energy Commission that includes the following:

- ~~A.— A summary of the certification services provided over the reporting period, including the total number of Acceptance Test Technicians and Employers certified by the agency during the reporting period and to date.~~
- ~~B.— A summary of all actions taken against any ATT or ATE as a result of the complaint or quality assurance procedures described by the ATTCP as required under Section 10-103.2(c)3D and 10-103.2(c)3F.~~
- ~~C.— A summary of the quality assurance and accountability activities conducted over the reporting period, including the compliance forms reviewed and the on-site audits performed as required under Section 10-103.2(c)3Fii during the reporting period and to date.~~
- ~~D.— A summary of the number and type of acceptance tests performed in each local jurisdiction over the reporting period and to date.~~
- ~~E.— A signed certification to the Energy Commission that the ATTCP continues to meet the requirements of Section 10-103.2.~~
- A. Certification Services. A summary of the certification services provided during the reporting period, including:
 - i. The number of Acceptance Test Technicians (ATTs) and Acceptance Test Employers (ATEs) newly certified.
 - ii. The Certification IDs renewed, inactive, suspended, or decertified;
 - iii. Total certifications held to date and latest code cycle certified; and
 - iv. Any additional information necessary to report certification activity.

- B. Disciplinary Actions. A summary of all actions taken against any ATT or ATE as a result of complaints or quality assurance procedures conducted pursuant to Sections 10-103.2(c)3D and 10-103.2(c)3F. The summary shall include:
- i. Description of the ATTCP's approved complaint and quality assurance procedures, as applicable to the actions taken and sufficient to understand the type of action;
 - ii. The general nature and source of each complaint or quality assurance finding;
 - iii. The ATT or ATE involved; and
 - iv. The status or resolution of each action.
- C. Quality Assurance and Accountability. A summary of the quality assurance and accountability activities conducted during the reporting period and to date, , as required under Section 10-103.2(c)3F, including for each ATT:
- i. The number of each type of acceptance test completed ;
 - ii. The number of desk audits, on-site audits, and failed audits; and
 - iii. Aggregate totals.
- D. Acceptance Testing Data. A summary, per project, of the number and types of acceptance tests performed in each local jurisdiction during the reporting period and to date. The summary shall, at minimum, identify:
- i. The jurisdiction, project address, permit number;
 - ii. The acceptance test type; and
 - iii. The number of tests completed.
- E. Certification Statement.
- i. A signed statement by an authorized representative of the ATTCP certifying that the ATTCP continues to meet all requirements of Section 10-103.2.
- F. Form and Manner of Submittal.
- i. The annual report shall be submitted to the Energy Commission by March 31 of the calendar year immediately following the reporting period.
 - ii. The Commission may make available recommended formats, templates, or electronic reporting tools to support consistent, accurate, and efficient reporting.

6. MEASURE NAME: Revise the definition of substantive and nonsubstantive change in Sections 10-103.1(f)1A and 1B and 10-103.2(f)1A and 1B.

Building Type and Building System

This measure proposes no direct changes to Part 6 requirements for any building type or system. The measure applies to the management of the ATTCP program which provides a compliance pathway for nonresidential buildings, multifamily buildings, and hotels or motels.

Measure Description (Purpose)

The purpose of this addition is to clearly define what constitutes a substantive versus a nonsubstantive amendment to an ATTCP application.

Justification (Necessity)

This addition is necessary to standardize ATTCP amendment reviews and reduce ambiguity about when changes must go through the application review (for substantive updates) versus the Executive Director's streamlined approval (for nonsubstantive changes).

AB130 Impact

This proposal is outside the scope of AB130 because it does not include any additional Part 6 requirements for Residential Group R occupancies.

Data Needs

There is no new data needed for this change.

Key Stakeholders

The key stakeholders include ATTCPs and ATTs/ATEs.

Estimated Energy Savings

Staff expect there to be no direct energy savings associated with this proposal.

Estimated Costs

Staff expect there to be no costs associated with this proposal.

Economic Impacts

Staff expect there to be no meaningful economic impact associated with this proposal.

Proposed Language Changes

Section: 10-103.1(f)1A and 1B

1. Amendment Scope.

- A. **Nonsubstantive Changes.** A nonsubstantive change is a change that does not substantively alter the requirements of the application materials for the ATTCP, ATT, or ATE. A nonsubstantive change includes correcting typographical errors, modifying contact information, renaming positions or programs, and making changes that do not impact consumers, ATTs, ATEs, or alter the ability of the ATTCP to comply with any requirement of Section 10-103.1(c). For amendments making only nonsubstantive changes, the ATTCP shall submit the following:
- B. **Substantive Changes.** A substantive change is a change that substantively alters the requirements of the application materials for the ATTCP, ATT, or ATE. Substantive changes include any changes to training, database provider, certification, or oversight (including quality assurance) that would result in any impact to consumers, ATTs, ATEs,

or the ability of the ATTCP to comply with any requirement of Section 10-103.1(c). For amendments making any substantive changes, the ATTCP shall submit the following:

Section: 10-103.2(f)1A and 1B

1. Amendment Scope.

- A. **Nonsubstantive Changes.** A nonsubstantive change is a change that does not substantively alter the requirements of the application materials for the ATTCP, ATT, or ATE. A nonsubstantive change includes correcting typographical errors, modifying contact information, renaming positions or programs, and making changes that do not impact consumers, ATT, ATE, or alter the ability of the ATTCP to comply with any requirement of Section 10-103.2(c). For amendments making only nonsubstantive changes, the ATTCP shall submit the following:
- B. **Substantive Changes.** A substantive change is a change that substantively alters the requirements of the application materials for the ATTCP, ATT, or ATE. Substantive changes include any changes to training, database provider, certification, or oversight (including quality assurance) that would result in any impact to consumers, ATT, ATE, or the ability of the ATTCP to comply with any requirement of Section 10-103.2(c). For amendments making any substantive changes, the ATTCP shall submit the following: