

BUILD AMERICA, BUY AMERICA ACT FINAL NONAVAILABILITY WAIVER

Project-Specific Nonavailability Waiver of Build America, Buy America Act
(BABAA) Requirements for

Idaho State Veteran Home in Boise, Idaho 122-Bed Skilled Nursing Care Replacement Facility

1. Introduction.

The United States Department of Veterans Affairs (VA) is issuing a nonavailability waiver of the manufactured product requirements of Section 70914 of the Build America, Buy America Act (BABAA) included in the Infrastructure Investment and Jobs Act (P. L. 117- 58) for multiple products for a single project.

VA has completed its market research efforts and was unable to identify alternative domestic products meeting the performance-based specifications, in sufficient and reasonably available quantities, and of a satisfactory quality. VA makes every effort to locate domestic alternative products through its waiver process, and the public comment period provides a meaningful opportunity to vet the agency's interim research.

2. Background.

The Buy America Preference set forth in section 70914 of BABAA included in the Infrastructure Investment and Jobs Act (P.L. 117-58), requires all iron, steel, manufactured products, and construction materials used for infrastructure projects under Federal financial assistance awards be produced in the United States.

Under section 70914(b), a Federal agency may waive the application of the Buy America Preference in any case in which it finds the following: applying the domestic content procurement preference would be inconsistent with the public interest; types of iron, steel, manufactured products, or construction materials are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality; or the inclusion of iron, steel, manufactured products, or construction materials produced in the United States will increase the cost of the overall project by more than 25%. Under section 70914(c), all waivers must have a written explanation for the proposed determination; provide a period of not less than 15 days for public comment on the waiver; and submit the waiver to the Office of Management and Budget Made in America Office for review to determine if the waiver is consistent with policy.

3. Summary.

Waiver Type: Nonavailability of domestic products in sufficient and reasonably available quantities or of a satisfactory quality.

Waiver Level and Scope: Project level waiver for multiple products for a single project.

No other project will utilize the waiver.

Waiver Description: Project-specific nonavailability waiver of BABAA requirements for Idaho's (ID) State Veteran Home: 122-Bed Skilled Nursing Care Replacement Facility, in Boise, ID, for multiple products in the following product categories (see Appendix A for the details and specifications of the exact products waived):

- a. Architectural – 33 products: drywall fasteners and trim pieces; fasteners and fittings; fiber reinforced composite fluted panels; bituminous waterproofing; sheet waterproofing; traffic coating; continuous insulated cement board system with acrylic finish; reinforcing mesh; thermoplastic membrane roofing; adhesive for thermoplastic membrane roofing with roof pavers; metal flashing and trim (flexible flashing, perimeter flashing, aluminum break metal, galvanized steel, pre-finished galvanized steel and stainless-steel flashings); fireproofing - spray (with primer) and intumescent paint; firesafing; smoke containment barriers; expansion joint; joint sealants; hollow metal doors, and frames; flush wood doors; stile and rail wood doors; access doors and panels; overhead coiling grilles; sectional doors; all-glass entrances and storefronts; automatic entrances; aluminum framed storefronts: trims, accessories, fasteners, connectors required to assemble the aluminum-framed storefronts; aluminum clad wood windows; interior sliding pass through windows; door hardware; safety and security window films; dimensional letter signage; electric fireplaces; facility fall protection (roof anchors); and electric traction elevator.
- b. Structural – 16 products: reinforced concrete: non-shrink grout; cast-in-place concrete; water stops; cast-in-place concrete; epoxy; structural steel framing (various sizes and shapes; hot rolled shapes; plates, high-strength structural bolts; framing angle and connector; anchor bolts, connector bolts, and washers; open web steel joists); steel decking (power actuated fasteners; steel deck: B roofing; and galvanized steel deck: W2); and cold-formed metal framing (cold form structural studs, various sizes and shapes; interlocking metal stud framing components, fire rated head of wall metal stud deflection track; galvanizing; and rated slip track on metal studs).
- c. Sitework – 14 products: asphalt paving; unit pavers; unit paver setting sand; pavement markings; outdoor fireplace; irrigation system and component (drip control zone kit; globe valve; quick coupler; decoder controller; ethernet communication module; station controller; reduced backflow preventer; direct burial irrigation control cable, strong box backflow enclosure, brass angle globe valve; solvent cement; and hydrometer); non-woven geotextile fabric; and fire hydrants.
- d. Plumbing Equipment - 12 products: water heater; hot water recirculating pumps; trench style roof drain; mixing valves; backflow preventor; emergency eye wash; service sink; bathtub/shower; bathing suite tub; wall boxes for ice makers and clothes washers; domestic water booster pump; and piping valves.

- e. Plumbing Fixtures - 20 products: toilet, trip lever; toilet seat; integral sink; 12" grab bar; 48" grab bar; urinal with electronic flush valve; wall hung sink; touchless bathroom faucet; kitchen faucet; undermount Americans with Disabilities Act-compliant three compartment sink; pull-down kitchen faucet; mixing valve; shower head; wall mount supply elbow; linear shower drain; clinical sink; flushometer; wall mount clinical sink faucet; and bed pan washer with foot controls.
- f. Electrical - 18 products which includes: copper wiring; grounding connector products: bolted connectors, welding connectors, below grade compression fittings; raceways and boxes: outlet and devices boxes, floor boxes, pull and junction boxes, enclosures and cabinets; cable trays; distribution switchboards; main switchboards; panel boards; wiring devices; fuses; disconnect switches; packaged engine generators and transfer switches; transient voltage surge suppression; telecom cabling; nurse call and wander management; nurse call and wander management; video surveillance remote devices and sensors; fire alarm systems; and intercom/buzz in system.
- g. Light Fixtures - 36 products: art deco semi-flush ceiling light; 12" (lobby reception); art deco pendant 14" (lobby reception); art deco pendant long 10" (lobby reception); abstract linear drop chandelier - 48" (elevator lobby 1 and 2 (quantity 1) and west corridor); abstract linear drop chandelier - 36" (elevator lobby 1 and 2 (quantity 2) and west corridor (quantity 2)); abstract linear drop chandelier - 48" (elevator lobby 3); abstract linear drop chandelier - 36" (elevator lobby 4); art deco pendant (sports bar); art deco wedding cake globe pendant (chapel); early 20th century warehouse light style 16" pendant (server/dining memory care); community table linear pendant (care giver floors 2 - 4; none for memory care); paris street lamp (server/dining floors 2 - 4); pleat (care giver floors); multipurpose drop light; art deco style light fixture - 60"; art deco candlestick pendant light fixture (all floors - lobby, main street, and canteen); sports bar sconce; theater sconce; theater wall step light; public multi: crystal wall sconce; single restrooms; barber beauty sconce; arts and crafts sconce reading light; resident room bath; picture light; 24" and 30" picture light (1st floor corridor); multi-purpose/activity and rehabilitation/therapy; memory care corridor; resident corridors (three light fixtures); resident room exam light; conference linear; exterior wall sconces; vertical slotted light; exterior step lighting; path lighting; and residential can unit.
- h. Mechanical - 10 products: dedicated outdoor air unit; make-up air units; chilled water pumps; exhaust fans; glycol make-up package; pot feeder; gas fired unit heater; flow meter; building automation system; and boilers, controls, and tubing.
- i. Interior Finishes - 30 products: cubicle track and curtains; tile (4 types); resilient flooring (9 types); acoustical ceilings (4 types); metal pan ceilings (5 types); wood casework: interior cabinet hardware; tiling transitions; window shades; adhesives

for flooring and wall covering; privacy films; toilet accessories; and entrance floor mat and frame.

- j. Laundry - 3 products: hand sink with eye wash and wall shelves; drain trough; and lint collector.
- k. Food Service - 4 products: hose reel; evaporative/condensing units; worktable and wall shelves; and disposer.
- l. Fire Suppression - 6 products: sprinkler heads and various components associated; bolts for grooved couplings; hangers; braces and clamps; escutcheons and trim; and all thread rods.

Project Summary: The State of Idaho's Division of Veterans Services (IDVS) proposes to construct a 122-Bed Skilled Nursing Care Facility in Boise, ID to replace the existing 1965 State Veterans Home in Boise, ID with a new four-story, 160,729 square feet facility. The existing skilled nursing care facility is an outdated, institutional model of senior skilled nursing care with two, dual occupancy resident rooms sharing a jack-and-jill bathroom. The building systems and infrastructure are aging with many at the end of their serviceable lives. The new facility will follow VA's Small House Model Design Guide, the current model of care for skilled nursing facilities, to provide a more home-like environment. Resident rooms will have private bedrooms/bathrooms for privacy, dignity, health, and safety of the Veterans.

Length of the waiver: This waiver will be in effect for the Federal award made for the project for 5 years from the publication date of this document, May 27, 2025, the anticipated end of the construction period.

Summary of Items Covered in the Waiver (including NAICS): The IDVS is seeking a waiver for 33 architectural products; 16 structural products; 14 sitework products; 12 plumbing equipment products; 20 plumbing fixture products; 18 electrical products; 36 light fixture products; 10 mechanical products; 30 interior finishes products; 3 laundry products; 4 food service products; and 6 fire suppression products (see Appendix A for details).

4. Description of Efforts Made to Avoid the Need for a Waiver.

Both IDVS and VA have made a good faith effort to obtain domestically produced iron and steel, manufactured products, and construction materials. The IDVS design and construction team spent over 1,500 hours researching and contacting each manufacturer for all iron and steel, manufactured products, and construction materials specified during the design phase. This is documented in IDVS' waiver request and in the description of VA's extensive research efforts listed below.

VA conducted product scouting through the Oklahoma Manufacturing Alliance (OMA), one of the National Institute of Standards and Technology Manufacturing Extension

Partnership (NIST MEP) centers. OMA utilized the NIST Manufacturing Extension Partnership National Network supplier scouting process for 10 out of 12 disciplines for BABAA-compliant products. Laundry and sitework items were not scouted due to OMA's past projects, scouting processes that yielded no results for items within these categories. In addition, laundry and sitework items are found in retail/wholesale capacities, not necessarily at the manufacturer's level.

The NIST MEP national scouting opportunity concluded on November 7, 2024. The market research process included a thorough review of the waiver request submission, examination of domestic manufacturer catalogs and other technical data and marketing materials, direct communication with domestic manufacturers, inquiries of regional project officers, and outreach to contractors and engineers with expertise and familiarity with the project. During market research, the OMA-VA team contacted a total of 77 manufacturers and suppliers consisting of the following:

- a. Sixteen manufacturers and suppliers for architectural items;
- b. Nine manufacturers and suppliers for structural items;
- c. Seven manufacturers and suppliers for plumbing equipment and plumbing fixtures items;
- d. Eleven manufacturers and suppliers for electrical items;
- e. Ten manufacturers and suppliers for light fixtures items;
- f. Eight manufacturers and suppliers for mechanical items;
- g. Five manufacturers and suppliers for interior finishes items;
- h. Five manufacturers and suppliers for food service items; and
- i. Six manufacturers and suppliers for fire suppression items.

The OMA-VA technical team identified these manufacturers in their attempt to find all potential domestic manufacturers of the above-mentioned products. When contacted:

- a. Architectural: Two manufacturers' products do not meet the project specifications. Five manufacturers are unable to meet BABAA requirements. Four (4) manufacturers do not supply the scouted products. One manufacturer does not offer their products in Idaho. One manufacturer does not work with Government entities. One manufacturer is not on Idaho's list of approved roofing systems. Two manufacturers were unresponsive.
- b. Structural: Seven companies are steel fabricators and do not supply the scouted products. Two manufacturers were unresponsive.
- c. Plumbing Equipment and Fixtures: Two manufacturers' products do not meet the project specifications. Three manufacturers do not supply the scouted products. One manufacturer provides non-permanent equipment and BABAA does not apply. One manufacturer was unresponsive.
- d. Electrical: Two manufacturers' products do not meet the project specifications. Three manufacturers do not supply the scouted products. Two manufacturers are unable to meet BABAA requirements. Two manufacturers provide custom fabrication and do not provide service contracts to maintain the systems. Two manufacturers were unresponsive.

- e. Light Fixtures: One manufacturer does not supply the scouted products. Four manufacturers' products do not meet the project specifications. Three manufacturers indicated the potential to meet the specifications. However, the project decided not to utilize this option, as it would require a sole source procurement, violating Idaho's procurement requirements. Two manufacturers were unresponsive.
- f. Mechanical: One manufacturer was previously contacted by the Idaho team during design and is unable to meet BABAA requirements. One manufacturer said they could be BABAA compliant but did not provide follow-up documentation. Three manufacturers do not supply the scouted products. One company is a wholesaler and does not sell products outside of Michigan. One manufacturer indicated the potential to meet the specifications. However, the project decided not to utilize this option, as it would require a sole source procurement, violating Idaho's procurement requirements. One manufacturer was unresponsive.
- g. Interior Finishes: Two manufacturers' products do not meet the project's specifications. One manufacturer does not supply the scouted products. One manufacturer indicated the potential to meet the specifications. However, the project decided not to utilize this option, as it would require a sole source procurement, violating Idaho's procurement requirements, and require IDVS to purchase/stock multiple manufacturers products to maintain the facility. One manufacturer was unresponsive.
- h. Food Service: One manufacturer's product does not meet the project specifications. One manufacturer does not supply the scouted products. Three manufacturers provide non-permanent equipment, and BABAA does not apply. Of the 31 items sourced, 27 are furnishings and equipment that are not permanently affixed to the structure, and BABAA does not apply.
- i. Fire Suppression: Three manufacturers' products do not meet the project specifications. One manufacturer is licensed in Connecticut, New Hampshire, Massachusetts, and Rhode Island and does not provide fire protection systems in Idaho. Two manufacturers were unresponsive.

Assessment of Cost Advantage of a Foreign-Sourced Product: Under Office of Management and Budget M-24-02, agencies are expected to assess "whether a significant portion of any cost advantage of a foreign-sourced product is the result of the use of dumped steel, iron, or manufactured products or the use of injuriously subsidized steel, iron, or manufactured products" as appropriate before granting a public interest waiver. VA's analysis has concluded that this assessment is not applicable to this waiver as this waiver is not based on the cost of foreign-sourced products.

Anticipated Impact if No Waiver is Issued: Absent a waiver, the IDVS project completion is at risk since it will not meet the BABAA compliance requirements to obtain the grant award and the State of Idaho would not receive up to 65% VA grant funding. This would adversely affect the state's ability to house and serve senior Veterans.

Summary of Public Comments: The proposed waiver was posted on VA's public facing website during the period of February 20 – March 7, 2025, and a notice of the proposed waiver was posted to the Made in America website, to satisfy the requirement to publish any Build America, Buy America Act Project Waiver and provide the public with fifteen 15 days to submit comments. No comments were received from the public, and therefore no substantive changes were made between this waiver and the version that was posted for public comment.

5. Description of Award.

Common Government-wide Accounting Classification: 036.

Title of Project: Idaho State Veterans Home: 122-Bed Replacement Facility, Boise, ID.

Infrastructure Project Description and Location: Idaho Division of Veterans Services proposes to construct a 122-Bed Skilled Nursing Care Facility in Boise, ID.

Recipient Name: The State of Idaho's Division of Veterans Services

Unique Entry Identifier: TTJZG4XKE6K9.

Federal Financial Assistance Program: State Veterans Home Construction Grant Program (64.005).

Federal Financial Assistance Identification Number: FAI 16-009.

Federal Financial Assistance Listing Name: 64.005 Grants to States for Construction of State Home Facilities.

Federal Financial Assistance Funding Amount: \$70,023,724.20.

Total Cost of Infrastructure Expenditures: \$107,728,806.46.

Total Amount Applicable to the Wavier: \$30,610,103.00.

//signed//
Douglas A. Collins
Secretary of Veterans Affairs
May 27, 2025

Appendix A: Detailed Product Waiver Description

**FAI 16-009: 122-Bed Skilled Nursing Care Replacement
Facility, Boise, ID**

Product Summary Tab			
Category	Waiver Needed	BABAA Compliant	Total
Architectural	33	30	63
Structural	16	5	21
Sitework	14	28	42
Plumbing Eq.	12	9	21
Plumbing Fixtures	20	2	22
Electrical	18	2	20
Light Fixtures	36	8	44
Mechanical	10	11	21
Interior Finishes	30	67	97
Laundry	3	4	7
Food Service	4	36	40
Fire Suppression	6	1	7
Total	202	203	405

Architectural Elements

Architectural Elements								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	09 2116, 05 4000, 09 2216		332722	Drywall fasteners and trim pieces			No	Many Drywall fasteners and trim pieces are not produced by domestic manufacturers. This includes typical drywall screws, and many trim pieces used in common drywall details needed for this building. A waiver is needed for drywall fasteners reglets, trim, and other drywall accessories in order to complete the drywall assemblies.
2	05 3100, 05 5000, 05 1000, 05 5133, 05 5213, 05 5216, 06 8200, 06 8316, 07 6200, 07 7200		332722	Fasteners and fitting			No	Fasteners and fitting are specific to the design details required for the project. These fasteners and fittings not domestically manufactured.
3	06 8200, 06 8316		325220	Fiber Reinforced Composite Fluted Panels	Exterior Façade		No	The engineered FRP attachment systems rely on specific fasteners and fittings. Those fasteners also must be stainless steel for corrosion resistance. The stainless steel screws and fasteners for the FRP mounting system are not sufficiently available as domestically manufactured products.
4	07 1113 Bituminous Dampproofing		238390	Below Grade Waterproofing	Below Grade Stem Walls and Footings		No	The manufacturer has been unable to provide any documentation confirming BABAA compliance.
5	07 1300 Sheet Waterproofing		238390	Sheet Waterproofing	Elevator Pits & Footings		No	The manufacturers are not able to provide any documentation confirming BABAA compliance.
6	07 1800 Pedestrian Traffic Crossings		238990	Traffic Coating			No	The manufacturer has not been able to provide any documentation confirming BABAA compliance.
7	07 2423 Continuous Insulated Cement Board System with Acrylic Finish			Cement Board System; Reinforcing Mesh	Exterior Finish		No	There is no US based manufacturing source for the reinforcing mesh thus making is eligible for a non-availability waiver. The entire industry buys this product from the same Canadian manufacturer.
8	07 5423 Thermoplastic Membrane Roofing		326299	TPO Roof Membrane and System Fasteners and Term Bars	Roof		No	The TPO roofing systems include specific fasteners for specific applications that are integral to the systems and their warranties. Suppliers have advised us that the fasteners for roofing insulation, the termination bars for TPO membrane, and the fasteners for the termination bars are not available from domestic manufacturers.
9	07 5424 Thermoplastic Membrane Roofing with Roof Pavers		326299	3M adhesive for backer	Roof Paver Tiles & Pedestal System		No	The adhesive is not BABBA compliant as the chemicals are sourced outside the U.S. This adhesive is compatible to the specified roofing systems. These systems are BABAA compliant. If a compatible adhesive is not used, the warranty will be void.
10	07 6200 Sheet Metal Flashing and Trim		332322	Flexible Flashing	Miscellaneous Openings		No	The manufacturers are not able to provide any documentation confirming BABAA compliance.
11	07 6200 Sheet Metal Flashing and Trim		332322	Perimeter Flashing, Aluminum Break metal, Galvanized Steel, Pre-Finished Galvanized Steel and Stainless Steel flashings	Miscellaneous locations with material transitions		No	Sheet metal suppliers have advised that steel coil material for making the architectural sheet metal, flashing, and trim for the project is not sufficiently available to ensure supply. Although the finished product is fabricated in the US, the bare coils are imported, and so will need a waiver.

Architectural Elements

Architectural Elements								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
12	07 8100 Fireproofing - spray (with primer) and intumescent		238310	Fire Spray and Intumescent Paint			No	The manufacturer is unable to provide any documentation for BABAA.
13	07 8100 Firesafing		238310	In all rated wall, floor-ceiling, roof-ceiling assemblies to maintain continuous fire rating			No	The manufacturer is unable to provide any documentation for BABAA.
14	07 8700 Smoke Containment Barriers		238310	Smoke Barriers	Elevator Doors and between Smoke Compartments		No	The smoke curtains are used in lieu of cross corridor doors and at the elevator doors in absence of an elevator lobby. They remain concealed in the ceilings and are released during an emergency. This features allows unobstructed view of the lobby areas and corridors that help with staff efficiency as well as help make the environment feel more residential versus institutional. The manufacturer is not able to confirm and/or provide any documentation for BABAA compliance
15	07 9513 Expansion Joint		332312	VF-400, VF-700, BRJ-700 CF, SFW-600, SJPF-400 W/FB	Walls, Floors and Roof		No	The manufacturer is not able to confirm and/or provide any documentation for BABAA compliance
16	07 9200 Joint Sealants		325520	Sealing control and expansion joints, Sealing joints between EIFS, adjacent construction, penetrations through EIFS	Miscellaneous locations between different materials and openings		No	The manufacturers are not able to provide any documentation confirming BABAA compliance. To achieve compatibility we need to have the full range of sealant products available.
17	08 1113 Hollow Metal Doors & Frames		332321	Hollow Metal Doors and Frames	Exterior and Interior doors		No	Frame materials are bought and fabricated locally. However the source of the steel is BAA, but is not BABAA compliant.
18	08 1416 Flush Wood Doors		321911	Wood Doors and Frames	Interior Doors		No	The Veteran Home is being designed to provide a very warm and welcoming residential environment for the residents, similar to what is experienced in a home. Studies have proven that skilled nursing residents benefit from such an environment as compared to a more institutional environment. Additionally, the building is inspired by the Art Deco style of Architecture to align with the rich character of the Idaho downtown buildings and to add to the Fort Boise Historical District. Keeping both these criteria in mind, all interior doors in the public areas are a single panel door designed with a specific molding/trim that complements the Art Deco style and provides a residential flavor. The doors are not BABAA compliant and there are no other manufactures found that meet compliance. The selected manufacturer also provides rated doors in the same style, which were otherwise not readily available. All of the above, makes this item eligible for a non-availability waiver.

Architectural Elements

Architectural Elements								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
19	08 1433 Stile and Rail Wood Doors		321911	Wood Doors and Frames	Interior Doors		No	The Veteran Home is being designed to provide a very warm and welcoming residential environment for the residents, similar to what is experienced in a home. Studies have proven that skilled nursing residents benefit from such an environment as compared to a more institutional environment. Additionally, the building is inspired by the Art Deco style of Architecture to align with the rich character of the Idaho downtown buildings and to add to the Fort Boise Historical District. Keeping both these criteria in mind, all interior doors in the public areas are a single panel door designed with a specific molding/trim that complements the Art Deco style and provides a residential flavor. The doors are not BABAA compliant and there are no other manufactures found that meet compliance. The selected manufacturer also provides rated doors in the same style, which were otherwise not readily available. All of the above, makes this item eligible for a non-availability waiver.
20	08 3100 Access Doors and Panels		332321				No	Elm Door and Bauco are not manufactured in U.S. Unable to obtain specific information/ certification for Nystrom, Acudor. Have reached out to all inquiring of compliance.
21	08 3326 Overhead Coiling Grilles		332321	Coiling Counter Door	Canteen Door		No	The manufacturer is not able to provide any documentation confirming BABAA compliance.
22	08 3613 Sectional Doors		332321		Garage Doors		No	The bus garage is designed to house 2 buses. The rough opening required for the buses require one large garage door. Additionally the limited vertical clearance available requires a specific size of track and door. The design restrictions limit the options for the door selection. The manufacturer selected based on the above criteria confirmed that not all of their components are built in the United States and will not be BABAA compliant.
23	08 4126 All Glass Entrances and Storefronts		327215	Single Glazed Frameless Partition	Behind Reception		No	The manufacturer is not able to provide any documentation confirming BABAA compliance.
24	08 4229 Automatic Entrances		332321		Main Entry		No	The design requires a minimum of 48 inch clear opening to allow for easy passage of residents and bed movement if needed in case of an emergency. The initial design was based on swing doors. However, to address the concern of infection control and avoiding contact needed to push open a swing door, a sliding door was proposed. The sliding door requires a larger rough opening as compared to the swing door. Nabco is the only manufacturer that was able to provide the 48 inch clear opening within the established massing. The product is Buy American compliant, but manufacture is unable and will not certify BABAA compliance.

Architectural Elements

Architectural Elements								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABAA Compliant		Waiver Needed/ Justification
						YES	NO	
25	08 4313 Aluminum-Framed Storefronts		332321	Trims, accessories, fasteners, connectors required to assemble the Aluminum-Framed Storefronts	Exterior façade the outdoor decks		No	According to manufactures, typical glazing accessories such as the stainless steel fasteners, setting blocks, glazing tape, shims, and mounting clips are products that are not domestically produced, and so are not available in BABAA compliant materials.
26	08 5200 Wood Windows		332321	Aluminum Clad Wood Windows	Exterior façade		No	The National Center for Biotechnology Information, a division of the National Library of Medicine (NLM) at the National Institutes of Health (Designing Hospital for better Infection Control: an Experience https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4923482/) has identified that "floors and walls should be easily cleanable and non-porous." As such, a window covering is an essential component of the exterior wall fenestration to allow the resident to enjoy the outdoors while alleviating the glare. In addition, the window covering has to be easily cleaned for better infection control and the product design needs to maintain resident safety as this demographic is prone to self-injury. Windows with integral blinds help address both concerns that the IDVS design and construction team have regarding the residents' overall well-being.
27	08 5616 Sliding Pass and Windows		332321	Sliding Pass Through Window	Testing Office. Verify kitchen pass through window		No	Either all or part of the components (outside of the components test) are not manufactured in the USA thus making this eligible for a non-availability waiver
28	08 7100 Door Hardware		332510	Door hardware and access control	Doors		No	The manufacturer is not able to provide any documentation confirming BABAA compliance, noted that most items are sourced outside of U.S.
29	08 8800 Safety and Security Films		332321	Window Film	Nurse's Station, Barber Shop, Physical Therapy		No	The manufacturer is not able to provide any documentation confirming BABAA compliance, thus making this product eligible for a nonavailability waiver.
30	101419 - Dimensional Letter Signage		339950	Exterior aluminum letters and numbers	Bldg Exterior and Monument signs		No	The manufacturer is unable to provide BABAA compliance confirmation.
31	10 3100 Fireplaces		332999	Electric fireplace	Living Areas in each household on floors 2-4		No	The project requires electric fireplaces rather than natural gas fireplaces due to the physical constraints of the building and keeping in mind the safety of the residents. Electric fireplaces are not available as BABAA compliant materials due to their country of manufacture or the amount of foreign made components used. In order to maintain the design intent of the building to provide fireplaces within the spaces available, a waiver is needed for electric fireplaces.

Architectural Elements

	Architectural Elements							
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
32	11 8129 Facility Fall Protection		332322	Roof Anchors			No	The manufacturer is a Canadian company and their factory is in Canada. To source the material and manufacturing to a US shop will result in special procurement of material for the project, which would be a custom fabrication with long lead times, thus making this item eligible for a non availability waiver.
33	14 2100 - RIB-Electric Traction Elevators		333921	Machine Roomless Traction Elevator	Lobby		No	Elevators have a very limited number of manufacturers. Most models are manufactured at least partially in other countries. Some of the essential components, like guide rails, are not made by any firms in the US. A waiver is needed to make elevators, available for the project.

Structural

Structural								
	Division # / Specification			Iron, Steel / Manufactured		BABBA Compliant	Waiver Needed/	
	Section	PSC Code	NAICS Code	Product / Construction	Location in Project	YES	NO	Justification
1	03 2000 - Concrete Reinforcing		238110	Masterflow 928 Non-Shrink Grout	Under base plates on footings; Bearing seats on concrete walls		NO	Unable to confirm this product through the manufacturer and it is specific to the design requirements. Manufacture is unable to verify compliance.
2	03 3000 - Cast-in-Place Concrete		238390	Bentonite Waterstops, Superstop 1" x 1/2"	Foundation Walls		NO	This product is specific to the project and manufactured in the United States, but because of the cost of the components that are mined, produced, and manufactured in the United States is less than the minimum required 55% of the total cost of all components of the good it does not meet the BABAA requirements.
3	03 3000 - Cast-in-Place Concrete		238110	SET 3G Epoxy	Foundation; Concrete Walls		NO	This product is specific to the project and manufactured in the United States and maximizes use of American-made goods, products, and materials, but it does not meet the BABAA requirements.
4	05 1200 - Structural Steel Framing		331210	Various Sizes & Shapes	Floor & Roof Framing		NO	Steel is domestically melted and manufactured in the USA, but the source of the steel is unknown and unable to verify. Locally sourced products and coils are available and can only be verified BAABA compliant at the time the order is placed, but this results in long lead times making this product eligible for a non-availability waiver.
5	05 1200 - Structural Steel Framing		331210	Hot Rolled Shapes	Floor & Roof Framing		NO	Steel is domestically melted and manufactured in the USA, but the source of the steel is unknown and unable to verify. Locally sourced products and coils are available and can only be verified BAABA compliant at the time the order is placed, but this results in long lead times making this product eligible for a non-availability waiver.
6	05 1200 - Structural Steel Framing		331210	Plates	Floor & Roof Framing		NO	Steel is domestically melted and manufactured in the USA, but the source of the steel is unknown and unable to verify. Locally sourced products and coils are available and only can be verified BAABA compliant at the time the order is placed, but this results in long lead times making this product eligible for a non-availability waiver.
7	05 1200 - Structural Steel Framing		331210	HSS	Columns		NO	Not able to confirm with manufacture, making this product eligible for a non-availability waiver.
8	05 1200 - Structural Steel Framing		331210	STRONG BOLT	Steel to Concrete Connections		NO	These products are specific to the design details required for the project, but they are manufactured outside the United States, therefore they do not meet the BABAA requirements.
9	05 1200 - Structural Steel Framing		331210	Framing Angles & Connector	CFS Framing		NO	This product is manufactured in the USA, and locally sourced products and coils are available and can only be verified BAABA compliant at the time the order is placed, but this results in long lead times making this product eligible for a non-availability waiver.
10	05 1200 - Structural Steel Framing		331210	Anchor Bolts, Connector Bolts, Washers	Structural Connections		NO	To achieve the design requirements we need to have the full range of bolt products available.

Structural

Structural								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction	Location in Project	BABAA Compliant		Waiver Needed/ Justification
						YES	NO	
11	05 2100 Steel Joist Framing		332312	Open Web Steel Joists - K-Series; LH-Series	Roof & Floor Joists		NO	The manufacturer is not able to confirm BABAA compliance. Due to the vast number of gauges and SKUs associated with the project, they may not have all the proper coils in stock which could cause longer lead times for those products, which restricts availability.
12	05 3100 Steel Decking		331210	Powder Actuated Fasteners, PDPA 0.157" DIA	CFS Tracks to concrete slabs		NO	This product is specific to the design details required for the project, but it is manufactured outside the United States, therefore it does not meet the BABAA requirements.
13	05 3100 Steel Decking		331210	Steel Deck - B Deck (roof), HSB 36	Roof Deck		NO	The manufacturer is not able to confirm BABAA compliance. Due to the vast number of gauges and SKUs associated with the project, they may not have all the proper coils in stock which could cause longer lead times for those products, which restricts availability.
14	05 3100 Steel Decking		331210	Galvanized Steel Deck - W2 (floor)	Floor Deck		NO	The manufacturer is not able to confirm BABAA compliance. Due to the vast number of gauges and SKUs associated with the project, they may not have all the proper coils in stock which could cause longer lead times for those products, which restricts availability.
15	05 4000, 09 2216 -Cold-Formed Metal Framing		331210	CFS Studs, Various Sizes & Shapes; interlocking metal stud framing components, fire rated head of wall metal stud deflection track; galvanizing	CFS Wall Framing		NO	The manufacturer is not able to confirm BABAA compliance. Due to the vast number of gauges and SKUs associated with the project, they may not have all the proper coils in stock which could cause longer lead times for those products, which restricts availability.
16	05 4000, 09 2216 - Cold-Formed Metal Framing		331210	Rated Slip Tract on metal studs	CFS Wall Framing		NO	The manufacturer is not able to confirm BABAA compliance or provide any documentation. Due to the vast number of gauges and SKUs associated with the project, they may not have all the proper coils in stock which could cause longer lead times for those products, which restricts availability.

Sitework

	Sitework							
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	32 1217 - Asphalt Paving	5630	238990		Parking lot and surround streets		No	We are unable to determine where all materials will be sourced. Local batch plants would not provide certification of BABAA Compliance.
2	32 1400 - Unit Paving	5630	238990	- Dublin in Aspen	Walk of Honor (Brick Pavers); Therapy Garden		No	The manufacturer was not able to provide documentation of BABAA compliance.
3	32 1400 - Unit Paving	5630	238990	- <i>Techniseal WL4 Protector - Polymeric Sand</i>	Walk of Honor (Brick Pavers); Therapy Garden		No	Techniseal is company based out of Canada . This product is the only sand compatible with the selected BABAA compliant pavers. Manufacturer is not able to provide any documentation confirming BABAA compliance. The product is manufactured in California but no documentation is available for BABAA.
4	32 1723 - Pavement Markings	5630	238990	HOTLINE Waterborne Traffic Paint	Parking lot		No	The manufacturer could not and would not provide documentation of BABAA compliance.
5	32 3300 - Site Furnishings	7290	238990	TC42 Outdoor Fireplace	West Patio - Bid Alt. 1		No	The manufacturer could not and would not provide documentation of BABAA compliance.
6	32 8400 - Plant Irrigation		221310	Drip Control Zone Kit; globe valve; quick coupler; Decoder controller; Ethernet Communication Module; Station controller	Irrigation System Component		No	The manufacturer manufactures these items listed outside of the United States to maintain the best pricing for their customers.
7	32 8400 - Plant Irrigation		221310	1-1/2" Reduced Pressure Backflow Preventer	Irrigation System Component		No	The manufacturer is not able to provide any documentation confirming BABAA compliance. The product is Buy American compliant but no BABAA compliance documentation can be obtained.
8	32 8400 - Plant Irrigation		221310	direct burial irrigation control cable	Irrigation System Component		No	The manufacturer would not provide documentation of BABAA compliance.
9	32 8400 - Plant Irrigation		221310	Strongbox Backflow Enclosure	Irrigation System Component (strong box enclosure)		No	The manufacturer would not provide documentation of BABAA compliance.
10	32 8400 - Plant Irrigation		221310	Brass Angle Globe Valve	Irrigation System Component		No	The manufacturer would not provide documentation of BABAA compliance.
11	32 8400 - Plant Irrigation		221310	Solvent Cement	Irrigation System Component		No	The manufacturer is not able to provide any documentation confirming BABAA compliance. The product is Buy American compliant but is not able to provide verification for BABAA.
12	32 8400 - Plant Irrigation		221310	Hydrometer	Irrigation System Component		No	The manufacturer would not provide documentation of BABAA compliance.
13	31 2000, 33 3400 - Storm Drainage Utilities	5630	237110	Non-woven Geotextile Fabric	To be used to wrap the see page beds.		No	The manufacturer could not and would not provide documentation of BABAA compliance.
14	33 1000 Water Utilities	4820	238220	Fire Hydrants			No	Required by AHJ before the project structure goes vertical. Lead times for domestically manufactured hydrants are 6-8 months longer than the alternative

Plumbing Eq.

	Plumbing Eq.							
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	22 0100 Plumbing		333318	Water Heater	1st Floor & Mezzanine		No	Yes/ Components are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.
2	22 0100 Plumbing		333318	Hot Water Recirc Pumps	1st Floor and Mezzanine		No	Yes/ Not manufactured in the US.
3	22 0100 Plumbing			Trench Style Roof Drain	Roof		No	Yes/ Not domestically sourced.
4	22 0100 Plumbing		332919	Mixing Valves (MV-1)	All floors/roof		No	Yes/ Not manufactured in the US.
5	22 0100 Plumbing		332919	4" Double Check Backflow Preventer	1st Floor		No	Yes/ Watts backflow preventers larger than 2" are sourced from outside the US.
6	22 0100 Plumbing		332999	Emergency Eye Wash	Floors 1-4		No	Yes/ BAA Compliant but not BABA Compliant
7	22 0100 Plumbing		332999	Service Sink	Floors 1-4		No	Yes/ Mop sink is manufactured in the US but less than 55% of materials are sourced from the US.
8	22 0100 Plumbing		326191	Bathtub/Shower	1st Floor		No	Yes/ BAA Compliant but not BABA Compliant
9	22 0100 Plumbing		326191	Bathing Suite Tub	Floors 2-4		No	Yes/ Not manufactured in the US.
10	22 0100 Plumbing		333318	Wall Boxes for Ice Makers and Clothes washers	Floors 1-4		No	Yes/ Materials sourced from outside U.S.
11	22 0100 Plumbing		333996	Domestic Water Booster Pump	1st Floor		No	Yes/System is BAA compliant (50% of cost is attributed to US) but not BABA compliant (Less than 55% of cost attributed to US, mostly due to electronics)
12	22 0100 Plumbing		332919	Piping Valves	Entire Building		No	Yes/ Not domestically sourced.

Plumbing Fixtures

Plumbing Fixtures								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	22 0100, 10 2800		327110	Toilet			NO	This applies to ALL Plumbing items needing a waiver. The Veteran Home is being designed to provide a very warm and welcoming residential environment for the residents, similar to what is experienced in a home. Studies have proven that skilled nursing residents benefit from such an environment as compared to a more institutional environment. The plumbing fixtures and toilet bath and laundry accessories selected provide a more residential feel to the facility. However, these products or part of their components are not manufactured in the United States and are not BABAA complaint, thus making them eligible for a non availability waiver.
2	22 0100, 10 2800		327110	Trip Lever			NO	see above
3	22 0100, 10 2800		321999	Toilet Seat			NO	see above
4	22 0100, 10 2800		327110	Integral Sink			NO	see above
5	22 0100, 10 2800		329999	12" Grab Bar			NO	see above
6	22 0100, 10 2800		329999	48" Grab Bar			NO	see above
7	22 0100, 10 2800		327110	Urinal with Electronic Flush Valve	Public Toilet		NO	see above
8	22 0100, 10 2800		327110	Wall Hung Sink			NO	see above
9	22 0100, 10 2800		332913	touchless bathroom Faucet			NO	see above
10	22 0100, 10 2800		332913	Kitchen Faucet			NO	see above
11	22 0100, 10 2800		332913	Undermount ADA compliant three compartment sink	Sports Bar		NO	see above
12	22 0100, 10 2800		332913	Pull -down kitchen Faucet			NO	see above
13	22 0100, 10 2800			Mixing Valve	Resident Bathroom		NO	see above
14	22 0100, 10 2800		332913	Shower Head			NO	see above
15	22 0100, 10 2800		327110	Wall Mount Supply Elbow			NO	see above
16	22 0100, 10 2800		327110	Linear Shower Drain	Resident Bathroom		NO	see above
17	22 0100, 10 2800		327110	Clinical Sink	Soiled Utility		NO	see above
18	22 0100, 10 2800		327110	Flushometer			NO	see above
19	22 0100, 10 2800		327110	Wall Mount Clinical Sink Faucet			NO	see above
20	22 0100, 10 2800		332913	Bed Pan Washer with Foot Controls			NO	see above

Electrical

Electrical								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	26 0519 conductors and cables	5995	335931	copper wiring	throughout building		NO	YES - manufacturers are available in the US, but source of cables and insulation are not trackable. No letters or statements of BABAA were available to be provided by manufactures.
2	26 0256 grounding (reference section 26 0519 - copper wiring)		423610	connector products: bolted connectors, welding connectors, below grade compression fittings	throughout building		NO	YES - manufacturers are available in the US, but source of copper and insulation are not trackable. No letters or statements of BABAA were available
3	26 0533 Raceways and Boxes		332618	outlet and devices boxes, floor boxes, pull and junction boxes, enclosures and cabinets	throughout building		NO	YES - The manufacturer is not able to confirm BABAA compliance or provide any documentation.
4	26 0536 Cable trays		332618	CABLE TRAYS	throughout building		NO	YES - The manufacturer is not able to confirm BABAA compliance or provide any documentation.
5	26 2400 Distribution Switchboards		335313		main electrical room		NO	YES - manufacturers are available in the US, but we have not found individual components to meet BABAA. No letters or statements of BABAA were able to be provided by manufactures.
6	26 2413 Main Switchboards		335313		main electrical room		NO	YES - manufacturers are available in the US, but we have not found individual components to meet BABAA. No letters or statements of BABAA were able to be provided by manufactures.
7	26 2416 Panelboards		335313		throughout building		NO	YES - manufacturers are available in the US, but we have not found individual components to meet BABAA. No letters or statements of BABAA were able to be provided by manufactures.
8	26 2726 Wiring Devices		335313		throughout building		NO	YES - The manufacturer is not able to confirm BABAA compliance or provide any documentation.
9	26 2813 Fuses		335313		throughout building		NO	YES - The manufacturer is not able to confirm BABAA compliance or provide any documentation.
10	26 2815 Disconnect Switches		335313		throughout building		NO	YES - manufacturers are available in the US, but we have not found individual components to meet BABAA. No letters or statements of BABAA were able to be provided by manufactures.
11	26 3213 Packaged Engine Generators and transfer switches	6115	335999				NO	YES - Manufacturers are not able to confirm BABAA compliance or provide any documentation.
12	26 4314 Transient Voltage Surge Suppression		335313				NO	YES - Manufacturers are not able to confirm BABAA compliance or provide any documentation.
13	27 1500 Telecom Cabling		335921	CAT6 cable, Jacks, patch panels, racks, fiber cable, cable hardware, utp cable, lv control,	throughout building		NO	YES - Manufacturers are not able to confirm BABAA compliance or provide any documentation.
14	27 5223 nurse call and wander management		334290		throughout building		NO	YES - Manufacturers are not able to confirm BABAA compliance or provide any documentation.

Electrical

	Electrical							
						BABBA Compliant		
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	YES	NO	Waiver Needed/ Justification
15	28 2310 nurse call and wander management		334290		throughout building		NO	YES - The manufacturer is not able to confirm BABAA compliance or provide any documentation.
16	28 2329 Video Surveillance Remote devices and sensors		334290		throughout building		NO	YES - manufactures confirmed they do not comply with BABAA
17	28 3100 Fire Alarm Systems		334290		throughout building		NO	YES - manufactures confirmed they do not comply with BABAA
18	DIV 28 intercom/buzz in system		334290		throughout building		NO	YES - manufactures confirmed they do not comply with BABAA

Light Fixtures

Light Fixtures								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	26 5100	6210	335122	(2) Schoolhouse Classic 12", Finish: (ATBR) Antique Tinted Brass	Lobby Reception		No	Yes. Not compliant
2	26 5100	6210	335122	Ashland Pendant (2) 14" Nouveau, Finish: (ATBR) Antique Tinted Brass	Lobby Reception		No	Yes. Not compliant
3	26 5100	6210	335122	Ashland Pendant Long Deco 10", Finish: (ATBR) Antique Tinted Brass	Lobby Reception		No	Yes. Not compliant
4	26 5100	6210	335122	Savoy Rigid Drop - 48", Finish: Bronze	Elevator Lobby 1 & 2 (Quantity 1) & West Corridor		No	Yes. Not compliant
5	26 5100	6210	335122	Savoy Rigid Drop - 36", Finish: Bronze (QTY: 2)	Elevator Lobby 1 & 2 (Quantity 2) & West Corridor (Quantity 2)		No	Yes. Not compliant
6	26 5100	6210	335122	Savoy Rigid Drop - 48", Finish: Bronze (QTY:1)	Elevator Lobby 3		No	Yes. Not compliant
7	26 5100	6210	335122	Savoy Rigid Drop - 36", Finish: Bronze (QTY:1)	Elevator Lobby 4		No	Yes. Not compliant
8	26 5100	6210	335122	Hollywood Old Brass Skyscraper	Sports Bar Pendant		No	Yes. Not compliant
9	26 5100	6210	335122	Hollywood with wedding cake globe	Chapel		No	Yes. Not compliant
10	26 5100	6210	335122	Hanger 31, 16" Pendant	Servery/Dining Memory Care		No	Yes. Not compliant
11	26 5100	6210	335122	Channel Linear, Finish: Matte Black	Community Table Pendant Floors 2-4 (none at memory care)		No	Yes. Not compliant
12	26 5100	6210	335122	1950S PARIS STREET LAMP PENDANT	Servery/Dining Floors 2-4		No	Yes. Not compliant
13	26 5100	6210	335122	Pleat	Care Giver Floors 2-4 (none for memory care)		No	Yes. Not compliant
14	26 5100	6210	335122	Savoy Rigid Drop - 60", Finish: Bronze (QTY: 1)	Multipurpose		No	Yes. Not compliant
15	26 5100	6210	335122	Cannele Candelstick, Bronze	ALL FLOORS - Lobby, Main Street, Canteen Sconce		No	Yes. Not compliant
16	26 5100	6210	335122	Merced Lighting	Sports Bar Sconce		No	Yes. Not compliant
17	26 5100	6210	335122	Genesis Black/White Swirl	Theater Sconce		No	Yes. Not compliant
18	26 5100	6210	335122	Casa, Finish: Black	Theater wall step light		No	Yes. Not compliant
19	26 5100	6210	335122	Balle Crystal Grand, Finish: Matte Black	Public Multi		No	Yes. Not compliant
20	26 5100	6210	335122	Lambert Hexagonal Linear Sconce 31"W	Single Restrooms		No	Yes. Not compliant
21	26 5100	6210	335122	Melange Sconce 20"	Barber Beauty Sconce		No	Yes. Not compliant
22	26 5100	6210	335122	Quintin Task Sconce, Vintage Brass	Arts & Crafts Sconce Reading Light		No	Yes. Not compliant
23	26 5100	6210	335122	LIBRARY GRAND PICTURE LIGHT	Resident Room Bath		No	Yes. Not compliant

Light Fixtures

	Light Fixtures							
	Division # / Specification			Iron, Steel / Manufactured		BABBA Compliant	Waiver Needed/	
	Section	PSC Code	NAICS Code	Product / Construction	Location in Project	YES	NO	Justification
24	26 5100	6210	335122	24" Library Grand, Finish: Antique Brass	1st FL. Corridor Picture Light		No	Yes. Not compliant
25	26 5100	6210	335122	30" Library Grand, Finish: Antique Brass	1st FL. Corridor Picture Light		No	Yes. Not compliant
26	26 5100	6210	335122	Astrid, Finish: Bronze	Multi-Purpose/Activity & Rehab/Therapy		No	Yes. Not compliant
27	26 5100	6210	335122	Puncheon Shallow, Quarry 6619	Memory Care Corridor		No	Yes. Not compliant
28	26 5100	6210	335122	Savoye	Resident Corridors		No	Yes. Not compliant
29	26 5100	6210	335122	Savoye	Resident Corridors		No	Yes. Not compliant
30	26 5100	6210	335122	Savoye	Resident Corridors		No	Yes. Not compliant
31	26 5100	6210	335122	Apollo 8 LED Ambient + Exam + Reading	Resident Room Exam Light		No	Yes. Not compliant
32	26 5100	6210	335122	Exos	Conference Linear		No	Yes. Not compliant
33	26 5600	6210	335122	Tess Slotted	Exterior Wall Sconces		No	Yes. Not compliant
34	26 5600	6210	335122	Casa, Finish: Black	Exterior Step Lighting		No	Yes. Not compliant
35	26 5600	6210	335122	Minimalist Aluminum Waterproof LED Black Modern Lawn Lamp Outdoor Lights, Finish: Black	Path Lighting		No	Yes. Not compliant
36	26 5100	6210	335122	RR2	RESIDENTIAL CAN UNIT		No	Yes. Not compliant

Mechanical

	Mechanical							
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	23 0100 - HVAC		238220	Dedicated Outdoor Air Unit (DOAS-11)	Roof		No	Yes/Smaller Units only made in non-domestic plants.
2	23 0100 - HVAC		238220	Make-up Air Units	Roof		No	Yes/Smaller Units only made in non-domestic plants.
3	23 0100 - HVAC		238220	Chilled Water Pumps	Mezzanine		No	Yes/Pump body castings done outside of US.
4	23 0100 - HVAC		238220	Exhaust Fans	Roof		No	Yes/Internal components not available in the US.
5	23 0100 - HVAC		238220	Glycol Make-Up Package	Mezzanine		No	Yes/System is BAA compliant (50% of cost is attributed to US) but not BABA compliant (Less than 55% of cost attributed to US)
6	23 0100 - HVAC		238220	Pot Feeder	Mezzanine		No	Yes/ Source and not manufactured in the U.S.
7	23 0100 - HVAC		238220	Gas Fired Unit Heater	Mezzanine		No	Yes/ Not manufactured in the U.S.
8	23 0100 - HVAC		238220	Flow Meter	Mezzanine		No	Yes/ BABBA compliance was not provided by manufacture.
9	23 09 00 - Direct Digital Controls for HVAC		238220	Building Automation System	Entire Building		No	Yes/the semi-conductor chips in all of the hardware are sourced from outside the US as the US has minimal production of chips.
10	23 0000 - Snow Melt System		238220	Boilers, Controls and Tubing	Sidewalks		No	Yes/ Not manufactured in the U.S.

Interior Finishes

Interior Finishes								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	10 2123 Cubicle Curtains and Track	7210	423220	Midlands, Fog	Theatre		NO	Not BABAA Compliant.
2	09 3000 Tiling	7220	238340	Ermanno Geometric, Gold on White	Canteen and Coffee Bar backsplash		NO	Not BABAA Compliant. Basis of design in specification and no alternative found after extensive investigation for alternatives
3	09 3000 Tiling	7220	238340	Gold Rectangle Rail, IM22	Restroom Accent Tile		NO	Not BABAA Compliant. Basis of design in specification and no alternative found after extensive investigation for alternatives
4	09 3000 Tiling	7220	238340	Multiplier, Penny Rounds, Dark Grey (Gold Grout)	Resident Room Shower back of Shampoo Niche		NO	Not BABAA Compliant. Basis of design in specification and no alternative found after extensive investigation for alternatives
5	09 3000 Tiling	7220	238340	Classic Rounds, CR-6 9999413256	Rehab backsplash		NO	Not BABAA Compliant. Basis of design in specification and no alternative found after extensive investigation for alternatives
6	09 6500 Resilient Flooring	7220	238340	Soundscape, Cinder	1st floor field LVT, Classroom, Barber Shop, Arts and Crafts,		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
7	09 6500 Resilient Flooring	7220	238340	Soundscape, Feather	Multipurpose Field LVT, Border on 1st Floor, 2nd Floor Field		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
8	09 6500 Resilient Flooring	7220	238340	Soundscape, Silk	Chapel		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
9	09 6500 Resilient Flooring	7220	238340	Soundscape, Latte	Sports Bar Field LVT, 3rd Floor Field		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
10	09 6500 Resilient Flooring	7220	238340	Tatami, Edo	Border on 1st Floor		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
11	09 6500 Resilient Flooring	7220	238340	Tatami, Kyoto	Multipurpose Border, Rehab field		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
12	09 6500 Resilient Flooring	7220	238340	Tatami, Rush	Border in Sports Bar, 2nd Floor Border		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
13	09 6500 Resilient Flooring	7220	238340	Tatami, Wabi	3rd Floor Border		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
14	09 6500 Resilient Flooring	7220	238340	Tatami, Straw	4th Floor Border		NO	Not BABAA Compliant. Necessary for even/level flooring transition for the safety of resident. No alternatives available.
15	09 5100 Acoustical Ceilings	5640	238390	2x2 Ultima Beveled Tegular white			NO	Not BABAA Compliant. No alternatives available.
16	09 5100 Acoustical Ceilings	5640	238390	2x2 Ultima Beveled Tegular black			NO	Not BABAA Compliant. No alternatives available.

Interior Finishes

Interior Finishes								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed / Justification
						YES	NO	
17	09 5421 Metal Pan Ceilings	5640	238390	Pattern 41, finish Matte White			NO	Not BABAA Compliant. No alternatives available.
18	09 5421 Metal Pan Ceilings	5640	238390	Metalworks Torsion Spring, 2'x6'			NO	Not BABAA Compliant. No alternatives available.
19	09 5421 Metal Pan Ceilings	5640	238390	Metalworks Linear - Synchro, 2"x96"			NO	Not BABAA Compliant. No alternatives available.
20	09 5421 Metal Pan Ceilings	5640	238390	Metalworks Linear - Synchro, 2"x96"			NO	Not BABAA Compliant. No alternatives available.
21	09 5100 Acoustical Ceilings	5640	238390	Tavola Prime Beams			NO	Not BABAA Compliant. No alternatives available.
22	09 5100 Acoustical Ceilings	5640	238390	1" thick, 4'x4' New Dimensions painted Ceiling Panel with square edges			NO	Not BABAA Compliant. No alternatives available.
23	09 5421 Metal Pan Ceilings	5640	238390				NO	Not BABAA Compliant. No alternatives available.
24	12 3200 Manufactured Wood Casework	7125	337110	Interior Cabinet Hardware			NO	<p>Interior Cabinet Hardware: Including but not limited to pulls, hinges, locks, etc.</p> <p>The safety of the resident is crucial to the design of each space. Similarly to door hardware, cabinet hardware is also not fully sourced or manufactured domestically. While there are alternatives, several of the pulls are custom, the concealed hinges are not commercially rated or warranted, and digital locks are not manufactured in the states.</p> <p>Commercially rated concealed hinges are easier to replace. Exposed hinges can warp and become unaligned as they wear. Long-term the concealed hinges are more durable. The Basis of Design salient characteristics: concealed hinge for durability and a "soft close" feature that prevents residents' fingers getting pinched.</p> <p>Safety locks are necessary to ensure there is no tampering of the locking unit in resident rooms. This is also needed for easy and quick access for caregivers' use. Urgent care is needed at times, the locks offer operational ease for the staff. Digital locks and 3-digit combination cabinet locks are important for staff and resident property but also safety of the resident. IDVS prefers the digital locks for ease of use at their facilities.</p> <p>Additionally, metal trim profiles are required for durability and quality of millwork to withstand walking assistance abuse, cart abuse and general wear and tear of millwork.</p>

Interior Finishes

Interior Finishes								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
25	09 3000 Tiling	7220	238390	Aluminum Trim: tile transitions, flooring, transitions			NO	Aluminum Trim: Including but not limited to wall tile transitions, flooring transitions, etc. Flooring transitions are important to resident safety and need to comply with ICC A117.1 Accessible and Usable Buildings and Facilities: Chapter 3 Section 303 – Changes in Level. The construction team has transitions planned at select floor changes, i.e.. – the facility has smooth concrete in select spaces that transition to LVT, this requires a transition. Flooring transitions provide safety to the residents from falls or tripping, they also add a level of durability to the flooring edges. Wall tile transitions are also essential for termination where tile ends in the middle of the wall.
26	12 2400 Window Shades	7230	337920	Window Treatments: Solar Shades, Brackets, Hardware			NO	Window Treatments: Solar Shades, Brackets & Hardware Shade systems are crucial for light control, solar glare, cleanability and to reduce heat gain. These qualities are important for staff and residents' well-being. They will be a vital component in destination spaces, dining areas and office spaces, etc.
27	09 7200 and 09 6500	7220	238390	Adhesive: flooring adhesive, wallcovering, adhesive, etc.			NO	Adhesives for flooring and wallcovering are specific to the product for compatibility. Speaking with various manufactures, the source materials for these adhesives come from overseas.
28	08 8723 Safety and Security Films	7105	317215	Films: 3M Caregiver window Antique Mirror			NO	Privacy films is required for HIPAA compliance. A waiver would be needed due to nonavailability issues.
29	10 2800 Toilet Bath and Laundry Accessories	7210	423210	Toilet Accessories			NO	The Veteran Home is being designed to provide a very warm and welcoming residential environment for the residents, similar to what is experienced in a home. Studies have proven that skilled nursing residents benefit from such an environment as compared to a more institutional environment. This supports the need for residential style toilet accessories. All of the above makes this item eligible for a non-availability waiver.
30	12 4813 Entrance Floor Mats and Frames	7220	326299	Recessed Walk-off Mat-Pedimat with Construction Specialties			NO	Flooring transitions are important to resident safety and need to comply with ICC A117.1 Accessible and Usable Buildings and Facilities: Chapter 3 Section 303 – Changes in Level. The construction team has a recessed walk-off mat planned at the entrance of the facility for the safety of the residents during wet/icy seasons to ensure a slip resistant and level transition from the exterior concrete path to the interior of the building.

Laundry

	Laundry							
	Division # / Specification			Iron, Steel / Manufactured		BABBA Compliant		Waiver Needed/
	Section	PSC Code	NAICS Code	Product / Construction	Location in Project	YES	NO	Justification
1	11 2300 Laundry	3510	423620	Hand Sink w/ eye wash Wall Shelves	First floor - Laundry room facility		no	The manufacturers were not able to provide documentation of BABAA compliance.
2	11 2300 Laundry	3510	423620	Drain Trough	First floor - Laundry room facility		no	The manufacturers were not able to provide documentation of BABAA compliance.
3	11 2300 Laundry	3510	423620	Lint Collector	First floor - Laundry room facility		no	The manufacturers were not able to provide documentation of BABAA compliance.

Food Services

Food Services								
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	Location in Project	BABBA Compliant		Waiver Needed/ Justification
						YES	NO	
1	11 4000 FOODSERVICE EQUIPMENT	7320	423440	Hose Reel	Kitchen Receiving		NO	Waiver Needed Commonality of service/warranty of faucets through-out the rest of the kitchen.
2	11 4000 FOODSERVICE EQUIPMENT	7320	423440	Evap / Condensing Units	Kitchen		NO	Waiver Needed Unable to find / confirm BABAA certified manufacturers for this category.
3	11 4000 FOODSERVICE EQUIPMENT	7320	423440	Work Table Wall Shelves	Kitchen		NO	Waiver Needed Unable to find / confirm BABAA certified manufacturers for this category.
4	11 4000 FOODSERVICE EQUIPMENT	7320	423440	Disposer	Bistro/Pantry		NO	Waiver Needed Dimensionally critical unit that would required redesign/specification of sinks and counters.

Fire Suppression

	Fire Suppression						
	Division # / Specification Section	PSC Code	NAICS Code	Iron, Steel / Manufactured Product / Construction Material	BABBA Compliant		Waiver Needed/ Justification
					YES	NO	
1	21 0000, 21 0100	4820	238220	Sprinkler Heads and various components associated.		No	Fire Sprinkler head components such as the glass bulbs and fusible links are not manufactured domestically. They are essential components that cannot be sourced elsewhere.
2	21 0000, 21 0100	4820	238220	Bolts for Grooved Couplings		No	Bolts for grooved couplings are not manufactured in the US . These bolts are specific to the application and are required for the project
3	21 0000, 21 0100	4820	238220	Hangers		No	Fire Sprinkler hangers are not manufactured in the US . These bolts are specific to the application and are required for the project
4	21 0000, 21 0100	4820	238220	Braces and Clamps		No	Fire sprinkler seismic braces and clamps are not manufactured in the US . These bolts are specific to the application and are required for the project
5	21 0000, 21 0100	4820	238220	Escutcheons and Trim		No	Fire sprinkler escutcheons and head trim are not manufactured in the US . These bolts are specific to the application and are required for the project
6	21 0000, 21 0100	4820	238220	All Thread		No	All thread rod is not manufactured in the US . This is required for the project to support piping systems.