

OSHAPD 01/16 Pt. 1

5/1/17

Nearman, Michael@DGS

From: Lisa Geraty <lgeraty@calhospital.org> on behalf of Cheri Hummel
<chummel@calhospital.org>
Sent: Monday, May 01, 2017 4:05 PM
To: CBSC@DGS
Cc: chummel@calhospital.org
Subject: Comment letter on proposed building standards - Title 24
Attachments: CHA comment on proposed building standards Title 24 5-1-17.pdf

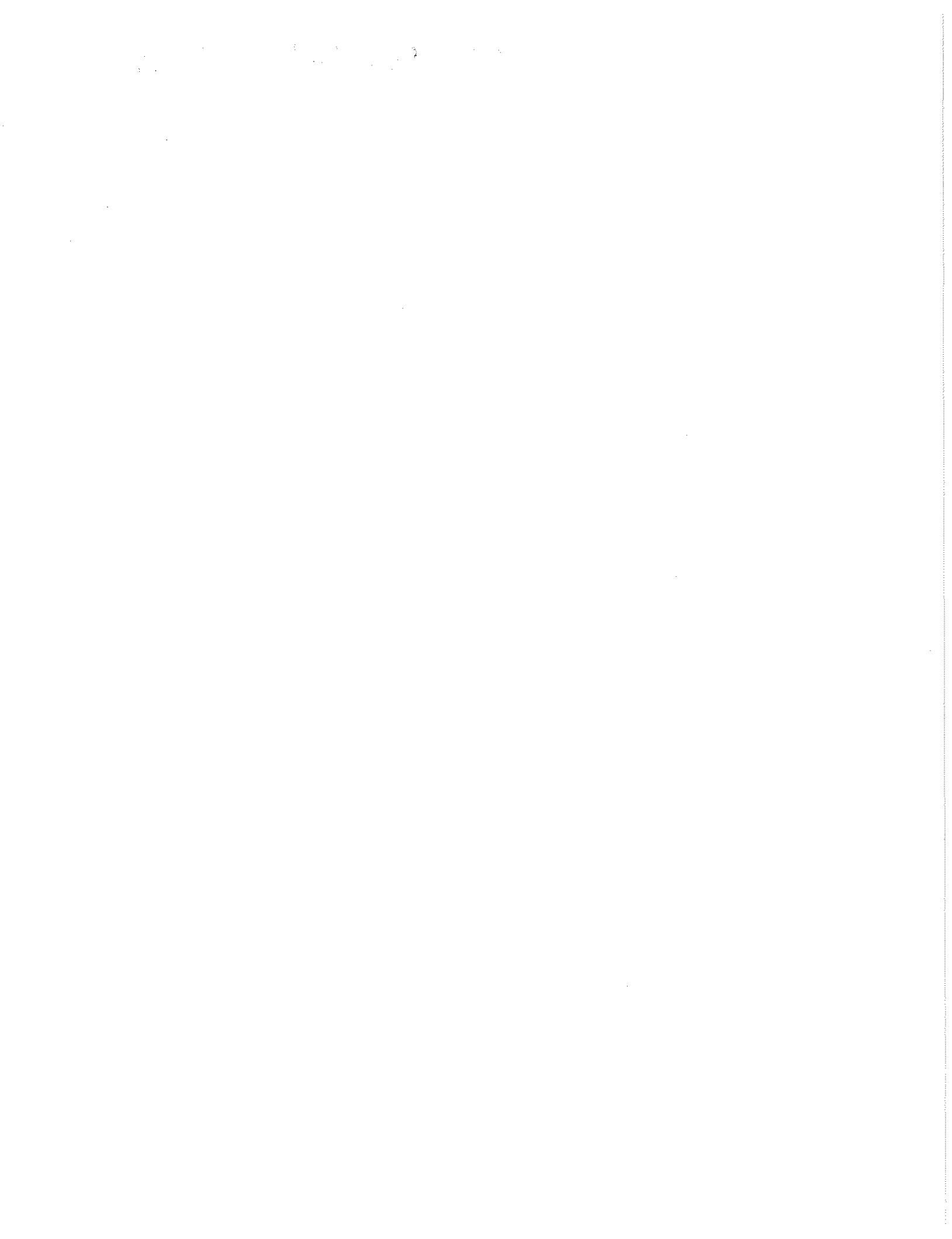
Please find attached the CBSC comment form along with CHA's comments regarding the proposed building standards for publication in Title 24, California Code of Regulations.

Warm regards,
Cheri

Sent by

Lisa Geraty on behalf of Cheri Hummel

ASSISTANT TO
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PUBLIC COMMENT on PROPOSED BUILDING STANDARDS
For Publication in Title 24, California Code of Regulations

Instructions

1. Use of this form is optional. Its use will help the California Building Standards Commission (CBSC) and other state proposing agencies to correctly administer your comments.
2. For matters to be considered by a CBSC Code Advisory Committee (CAC), written comments should be received in the CBSC office 7 days before the scheduled CAC meeting to help ensure CAC consideration.
3. For matters subject to a 45-day or 15-day Public Comment period announced by a Notice of Proposed Action (NOPA), written comments must be received on or before the close of the comment period identified in the NOPA available at CBSC website <http://www.bsc.ca.gov/>. Written and oral comments may be provided at the CBSC public meeting to consider the proposed building standards.
4. Separate comment submittals are necessary for CAC and Public Comment periods. Separate comment forms are necessary for each state agency proposal.
5. This form is available in Fill-and-Print format at CBSC website <http://www.bsc.ca.gov/>. Otherwise print the form, type or complete by hand and attach additional sheets if necessary.
6. Submit comments to the CBSC, 2525 Natomas Park Drive, Suite 130, Sacramento, CA 95833-2936, or by Email at cbso@dgs.ca.gov. Please do not FAX comments.
7. For assistance, call the CBSC at (916) 263-0916, or Email CBSC at cbso@dgs.ca.gov.

Commenter Identification and Contact Information

Last Name: Hummel First Name: Cheri Date: 05/01/17

Representing: California Hospital Association

Mailing Address: Number and Street: 1215 K Street Suite 800

City, State: Sacramento, CA Zip Code: 95814

Telephone: _____ Email Address: _____

Proposed Building Standard Identification

Title 24 Part No. (circle one) 1 2 2.5 3 4 5 6 8 9 10 11 12 Section No. See attachment

Proposing State Agency Office of Statewide Health Planning & Development

The proposed building standards is: Before a CAC In a 45-day Comment Period
(check one) In a 15-day Comment Period.

Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the reverse side is: (check one)

Approve Disapprove Further Study Required Approve as Amended

Comment/Suggestion on Title 24 Proposed Building Standard:

See attachment B

Identification of Attachments

Check if you have attached additional pages.

The number of pages attached:

2

For CBSC Office Use Only: Date Received: _____

Rulemaking Item # _____

Health and Safety Code Section 18930(a) reads:

(a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:

- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
- (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
- (3) The public interest requires the adoption of the building standards. The public interest includes, but is not limited to, health and safety, resource efficiency, fire safety, seismic safety, building and building system performance, and consistency with environmental, public health, and accessibility statutes and regulations.
- (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
- (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
- (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
- (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
- (8) The format of the proposed building standards is consistent with that adopted by the commission.
- (9) The proposed building standard, if it promotes fire and panic safety, as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.



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May 1, 2017

CBSC

2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833-2936

Subject: Public Comment on Proposed Building Standards For Publication in Title 24, California Code of Regulations

Attachment B

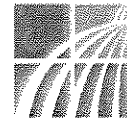
Nationally and in California meeting the special needs of psychiatric patients in all health care settings is a high priority. The California Hospital Association (CHA), representing approximately 400 hospitals and health systems, is appreciative of OSHPD's leadership in working with CDPH Licensing as well as hospitals and representatives from mental health interests in developing California Building Code Standards for free-standing psychiatric hospitals and psychiatric units within a general acute care inpatient hospital.

Acute psychiatric patients have different needs than typical patients in a hospital setting. OSHPD has been working diligently with appropriate entities to develop codes for acute psychiatric settings. OSHPD's proposed standards are in conformance with national standards and the Facilities Guidelines Institute (FGI) Guidelines. The FGI guidelines are developed in consultation with clinicians, architects, mechanical engineers and other appropriate experts.

The adoption of the proposed codes will establish new and specific criteria for these unique services. The model brings forward patient and staff safety in an environment where safety is paramount and better protections are necessary. The new proposed codes not only ensure quality patient care and healthcare worker safety, they also result in reduced healthcare costs. By using the Functional Program, OSHPD and CDPH Licensing are involved with the development of psychiatric hospital services from the start of a project.

CHA believes that the proposed psychiatric standards in the California Administrative Code along with applicable sections in the California Building Code, California Electrical Code, California Mechanical Code and the California Plumbing Code, meet the Building Standards Commission Nine Point Criteria.

For the above reasons CHA recommends that the Commission adopt the proposed psychiatric standards proposed by OSHPD.



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Attachment A

Title 24, Part 1, Chapter 7:
Section 7 – 119, Functional Program
(Relative to psychiatric services)
8: 9A, B, C (1), (2) (i) (ii)

The Psychiatric Services Component of the Functional Program also includes:

- The California Building Code Title 24, Part 2 – Volume 1
 - All proposed sections under Section 1224.31, Psychiatric unit space
 - All proposed sections under Section 1228, Acute Psychiatric Hospitals
- The California Electrical Code, Title 24, Part 3, Chapter 5, Special Occupancies relative to psychiatric services.
- The California Mechanical Code, Title 24, Part 4, Chapter 3, Section 320.5, Psychiatric Services for OSHPD 1, 2, and 4 and Table 4-B regarding filter efficiencies.
- The California Plumbing Code, California Code of Regulations, Title 23, Part 5, Chapter 3 General Regulations, Section 322, Psychiatric Services (OSHPD 1, 2 and 4).