

Comments from Glenn Gall on 2018 CBC Vol 1 1224 proposals;

1224.2.1 revise term occupancies to uses. Reason occupancy is determined apart from chapter 1224 use of the building which is independent of occupancy designation.

CLARITY

Exceptions 1, 2 and 3 allowed for under this section would allow may conflict or problem with 1224.2 exception 1 allowing continuance of sub-standard care. Please provide clarification if this is the intent or provide additional conditions as to when current compliance would be required. CLARITY

1224.4.4.5 Revision to item # 8 allows for the handwash station for the nutrition room to be on the opposite side of a door defeating the concept of handwashing. Please distinguish that the handwash station is allowed to be immediately adjacent only when an area is provided or clarify that access to the fixture does not require the user to operate a door. CLARITY

1224.4.4.8.1 the allowance for "Satellite service spaces do not require dedicated toilet rooms" s problematic as written. Assuming it is to address the pharmacy staff toilet(s), as written it can be over applied ie an outpatient emergency department with more than 3 imaging rooms or the remote observation unit considered to be a satellite of the Emergency Department.

This stems from satellite not being a defined term. CLARITY

1224.4.5.1 Language in this change appears to allow outpatient access to other than outpatient radiological services to traverse inpatient units.

Also conflicts with 1224.4.7.6 Departmental Boundaries rewrite. CLARITY

TABLE 1224.4.19 Recommend replacing this in its entirety with 2018 FGI Table 1.2-6 including footnotes. The table has both expanded and gotten more descriptive as to how to achieve in the footnotes. CLARITY, CURRENT NATIONAL STANDARD

1224.14.2.17 Delete proposed change. This is too broad. For sharing the units need to be compatible. This language is also duplicative with 1224.26 where it is better written. DUPLICATIVE, CLARITY

1224.17.3 As written this is normal to an outpatient or pre-procedure lab which is also provided by outside labs under contract to the hospital. This makes it a minimum requirement in the hospital lab. It may also conflict with revised satellite language. Recommend it be written as "If provided" and refer to 1224.4.4.3 Specimen and blood collection facilities. CLARITY, DUPLICATIVE

1224.19.1 Reference to “the extent of shared or purchased services” is confusing without further clarification of BoP requirements. Consider deletion of language so as to not cause further questions which another agency is wholly responsible for answering. CLARITY

1224.19.1.2 As structured appears to contain a typo “compliance with Section 1224.19.1.2” should be 1224.19.1.2.1. Recommend restructuring to combine 1224.19.1.2 with 1224.19.1.2.1 and have 1 less indent level for all of the subsections under 1224.19.1.2. CLARITY

1224.19.1.2.2 As written allows for the handwash station for the medication area to be on the opposite side of a door defeating the concept of handwashing. Please distinguish that the handwash station is allowed to be immediately adjacent only when an area is provided or clarify that access to the fixture does not require the user to operate a door. CLARITY

1224.19.2.1.3.2 As written allows for the handwash station for the areas where pharmaceuticals are handled to be on the opposite side of a door defeating the concept of handwashing. Please distinguish that the handwash station is allowed to be immediately adjacent only when an area is provided or clarify that access to the fixture does not require the user to operate a door. CLARITY

1224.19.3 a good deal of this language fails the 9 point criteria due to the fact it is within the purview of another agency. Additionally, the references to Title 16 are unenforceable as they are either not located within Title 24 or they are operational requirements under the Board of Pharmacy. THIS IS PROBLEMATIC.

1224.31.1.1 Referencing CAC Chapter 6 is an odd reference since this only addresses "EVALUATION PROCEDURES". This should just refer to a GAC building or not at all, just rely on the structural references. CLARITY

1224.39.6.1.2 Please clarify the jurisdiction this service may be under. Typically as an outpatient service it may be under local jurisdiction as OSHPD 3. If this service is similar to freestanding outpatient catheterization requiring OSHPD review please stipulate. CLARITY

1224.39.6.4.1 items 1 & 2 these would not meet the definition of “patient rooms”. CONFLICT, CLARITY

1224.39.6.4.2 Language is duplicative with 1224.4.4.1.3 Airborne infection isolation exam/ treatment room. Delete language and provide reference to 1224.4.4.1.3. DUPLICATIVE, CLARITY

1224.39.6.4.4 Can this 1 toilet serve 40 patient stations? Really needs a ratio. CLARITY

1224.39.6.5.15 Reference to “Table 1224.4.6.1 “Definitive emergency care observation unit” does not exist. CLARITY