

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Jeff Polachowski
Date: Friday, October 29, 2021 4:48:34 PM

Commenter Contact Information

Name: Jeff Polachowski
Date: 10/29/2021 12:00:00 AM
Representing: Kaiser Permanente
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Proposed Building Standard

Title 24 Part #: Part 2
Section #: Chapter 12, 1224.4.11.4a
Proposing State Agency: OSHPD
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):
Disapprove

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

The definition for the Class-1 room only allows for procedures that use natural orifice entry. Many low-risk needle-based procedures like biopsies, cavity drainages and microwave ablations (without anesthesia) do not fall under the safety requirements for Class-2 rooms. KP came to agreement with OSHPD and CDPH in 2018 that needle-based procedures can continue to be performed in Class-1 type rooms. KP is working with FGI to have this definition modified to exclude these procedures from Class-2 rooms in their upcoming updates.

9 Point Criteria Info:
18930(a) 6