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October 27, 2021

Richard Tannahill
Deputy Division Chief (Acting)
HCAI, FDD
2020 West El Camino Avenue, Suite 800
Sacramento, CA 95833

RE: 2022 California Building Code (CBC) Change Proposal

Dear Mr. Tannahill:

As the leading trade association representing the manufacturers of medical imaging equipment, radiopharmaceuticals, contrast media, and focused ultrasound therapeutic devices, the Medical Imaging & Technology Alliance (MITA) urges the following comments be taken into consideration for the 2022 California Building Code changes proposed. MITA recommends changes to the proposed Code language intended for inclusion in the 2022 CBC centered around adoption of the 2018 FGI Guidelines *Classifications of Room Types for Imaging Services*, with respect to the Initial Express Terms; 2022 CBC, Title 24, Part 2, Volume 1.

Specifically, the proposed definition of a Class 1 Imaging Room, in Table 1224.4.11.4a Examination/Treatment, Imaging, Procedure, and Operating Room Classification, does not allow an exception for the use of contrast injection within the space. While not explicitly stated in the 2018 FGI Guidelines Table 2.2-2, trainings published by FGI related to imaging room classifications have explicitly stated contrast injection is permitted in the Class 1 Imaging Room despite this requiring the penetration of the patient's skin, which is a natural protective membrane and otherwise excluded.

Contrast injection is commonly used while providing imaging services and excluding its use in a Class 1 Imaging Room will require most, if not all, imaging services, especially for computed tomography (CT), to be forced into classification as a Class 2 Imaging Room. The result will be the need for each facility to meet the additional requirements of Class 2 Imaging Rooms, greatly increasing construction costs associated with imaging equipment projects. Such additional requirements include:

1) the new requirement for 3 feet 6 inches of clearance on each side of the patient table, specified in 1224.4.4.1.4.2 (2) the requirements for Procedure rooms/Class 2 Imaging Rooms, will prove difficult for many existing facilities to meet in the future that currently operate with the minimum 3 feet of clearance;
2) Increased requirements for room surfaces;
3) Increased ventilation requirements;
4) Increased requirements for room lighting; and
5) Additional requirements related to allowable noise transmission.

The 2018 FGI currently references the need for contrast injection services in imaging rooms in the following section.

> **2.2-3.4.8.15 pre-and post-procedure patient care area**
> "(1) For Class 1 imaging rooms, a minimum of one patient care station shall be provided for every three Class 1 imaging rooms or fraction thereof where patients receive point-of-care lab work or injection preparation with non-radiopharmaceutical contrast agents."

Compliance with the new imaging room classification requirements will be difficult in many existing medical facilities. Due to the increased HCAI focus on the specific procedures being performed in imaging spaces, there have been challenges to receiving project approval to upgrade aging imaging equipment, most often multipurpose fluoroscopy rooms, where no change to currently preformed procedures or construction will take place. The additional supplemental space requirements that Class 2 (or even 3) Imaging Rooms are now required to meet based on current code becomes prohibitive in land locked facilities looking to replace equipment where funds and space is simply not available for extensive department renovations.

While MITA recognizes the need for patient procedure focused design of imaging rooms, we therefore, request consideration of the unintended costs and limitations to patient care resulting from the proposed 2022 CBC changes. MITA believes the proposed changes will not allow contrast injection in a Class 1 Imaging Room, leaving facilities with aging/outdated equipment at-risk of requiring future emergency replacement, creating significant impact to patient care. We look forward to working with HCAI to resolve these concerns.

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If you have any questions, please contact Laura Srebnik, Manager of Government Relations, lsrebnik@medicalimaging.org or 703.841.324.

Sincerely,

Patrick Hope
Executive Director, MITA

MITA is the collective voice of manufacturers of medical imaging equipment, radiopharmaceuticals, contrast media, and focused ultrasound therapeutic devices. It represents companies whose sales comprise more than 90 percent of the global market for medical imaging innovations. These products include: magnetic resonance imaging (MRI), medical X-Ray equipment, computed tomography (CT) scanners, ultrasound, nuclear imaging, radiopharmaceuticals, and imaging information systems. MITA

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