

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Laura Srebnik
Date: Wednesday, October 27, 2021 4:17:59 PM

Commenter Contact Information

Name: Laura Srebnik

Date: 10/27/2021 12:00:00 AM

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Proposed Building Standard

Title 24 Part #: Part 2

Section #: Chapter 12, 1224.4

Proposing State Agency: OSHPD/HCAI

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):

Further Study Required

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.

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.

There is a 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 imaging room classifications in conjunction with existing code requirements.

9 Point Criteria Info:

18930(a) 2

