

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 4:14:06 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, Table 1224.4.11.4a 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):
Approve as Amended

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.

An exception needs to be added, in Table 1224.4.11.4a Examination/Treatment, Imaging, Procedure, and Operating Room Classification, for Class 1 imaging room use to allow contrast injection.

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. The 2018 FGI currently references the need for contrast injection services in imaging rooms in section 2.2-3.4.8.15. Contrast injection is commonly used in the procedure room while providing imaging services, especially for computed tomography (CT), and should not be excluded in a Class 1 imaging room.

9 Point Criteria Info:

18930(a) 7(A)