

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 4:16:20 PM

Commenter Contact Information

Name: Laura Srebnik

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

Representing: Medical Imaging & Technology Alliance Mailing Address Number and Street: 1300 North 17th Street, Suite 900

City: Alrlington

State: VA

Zip Code: 22209

Telephone #: 7038413247

Email: lsrebnik@medicalimaging.org

Proposed Building Standard

Title 24 Part #: Part 2

Section #: Chapter 12, 1224.4.4.1.4.2 (2) 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.

The proposed requirement for 3 feet 6 inches of clearance on each side of the patient table, specified in 1224.4.4.1.4.2 (2) for Procedure rooms/Class 2 Imaging Rooms, will prove difficult and increase construction costs for many existing facilities to meet in the future that currently operate with the minimum 3 feet of clearance. This would likely require the removal of built in casework storing necessary supplies and providing work space in the procedure room at a minimum, and would necessitate extensive department construction to enlarge existing procedure rooms in other cases. For any CT rooms occasionally used for minimally invasive procedures triggering Class 2 imaging room design requirement this additional space will be prohibitive.

An exception is needed from the proposed increased clearance, of 3 feet 6 inches on the sides of the table in Class 2 imaging rooms, for existing facilities already functioning with 3 feet of clearance, to allow the 3 foot minimum to be maintained when replacing imaging equipment where more extensive construction is prohibitive.

9 Point Criteria Info:

18930(a) 8

