

Advisory
Guide
Series

A6

FOR
SKILLED NURSING
FACILITIES
[OSHPD 2]

ALTERNATE SOURCE
OF POWER TO
MAINTAIN SAFE
TEMPERATURES,
LIFE-SAVING
EQUIPMENT, AND
OXYGEN-GENERATING
DEVICES

Office of Statewide Hospital Planning and Development

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INTRODUCTION

The California Department of Health Care Access and Information (HCAI), Office of Statewide Hospital Planning and Development (OSHDP), has prepared this Advisory Guide which will cover the requirements for on-site alternate power source(s) sufficiently sized to feed: mechanical equipment required to maintain safer temperatures for residents, life-saving equipment, and oxygen-generating devices at skilled nursing facilities (SNFs). This alternate power source shall be in addition to the essential power requirements found in the California Electrical Code Sections 517.40 through 517.44 for the following two different conditions:

1. New Skilled Nursing Facilities.
2. Existing Skilled Nursing Facility Additions and Projects for Certain Remodels, and/or Replacement or Addition of Equipment.

This Advisory Guide also provides a Skilled Nursing Facility Assessment and Worksheet which can be used to evaluate SNFs for compliance. Existing facilities are encouraged to submit the Facility Assessment to demonstrate compliance, or for known non-compliant sites, to document the non-compliant conditions and propose upgrades necessary for future compliance. For known non-compliant sites, project teams are encouraged to develop a schematic-level plan and to include with the Assessment Worksheet to assist with the ultimate design and construction requirements to bring the facility into compliance. Remodels and other projects that will bring existing facilities into compliance are required to be completed on or after January 1, 2026. Once projects designed to bring existing facilities into compliance and construction is completed, a new Facility Assessment should be completed and submitted to OSHDP to document compliance. If OSHDP agrees that the facility is in compliance, these documents will be forwarded to CDPH for review. Once CDPH concurs, a letter will be sent to the facility stating that they are in compliance with the new requirements to have alternate power to maintain safe temperatures, operate life-saving equipment, and oxygen generating devices.

Department of Health Care Access and Information
Office of Statewide Hospital Planning and Development
has drafted this Advisory Guide in consultation with the
California Department of Public Health (CDPH)

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EXECUTIVE SUMMARY

Highly vulnerable patients residing in Skilled Nursing Facilities (SNFs) are at risk of losing the use of lifesaving medical equipment, oxygen-generating devices, and a safe environment when power outages occur from a public safety power shutoff, an emergency, a natural disaster, or other causes. Therefore, Health and Safety Code (HSC) Section §1418.22 requires SNFs to have an alternate source of power to support the following loads for no fewer than 96 hours during any type of power outage:

- Equipment required to maintain safe temperature for residents,
- Life-saving equipment, and
- Oxygen-generating devices.

Assembly Bill (AB) 2511 (Chapter 788, Statutes of 2022) added HSC §1418.22. HSC §1418.22 requires that either the alternate power source(s) used to back up these loads be provided with sufficient fuel onsite to maintain power production for no less than 96 hours, or the facility is required make arrangements for fuel delivery to meet the 96 hours of operation during an emergency event. Acknowledging the fact that some of the loads need to be restored within 10 seconds, and that fuel delivery will take some time, we have included a code requirement for on-site storage of fuel sufficient to operate alternate sources for a minimum of 6 hours of operation at all times. The law stipulates that the alternate power source must operate during power outages that may result from a public safety power shutoff, an emergency, a natural disaster, or other cause.

AB 2511 became effective January 1, 2023 and required that all SNFs comply with the requirements of HSC §1418.22 by January 1, 2024. Senate Bill (SB) 1511 (Chapter 492, Statutes of 2024) and AB 116 (Chapter 21, Statutes of 2025) further amended the compliance dates in the law. Beginning January 1, 2026, the requirements are enforceable by CDPH for construction of **new** SNFs and for existing SNF facility additions and projects for certain remodels and/or replacement or addition of some equipment. These new requirements are voluntary for **existing** SNFs not undergoing the kinds of projects listed in Section 4 until some date in the future (yet to be determined) when they will become mandatory.

Prior to the passage of these laws, there were no building code requirements for cooling equipment to be backed up by alternate power. In previous codes, the terms “life-saving equipment” and “oxygen-generating devices” were not identified, and therefore, not specifically required to be backed up by an alternate power source. To meet the statute requirements, these systems all need to be on an alternate source of power effective July 1, 2024. The California Building Standards Code, Title 24, California Code of Regulations, 2022 Intervening Code Adoption Cycle added building code language to address the new statutory requirements.

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SECTION 1 STATUTE AND CODE REFERENCES

A. STATUTE

Health and Safety Code, Division 2. Licensing Provisions, Chapter 2.4. Quality of Long-Term Health Facilities, 1418.22

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=1418.22.&lawCode=HSC

B. CALIFORNIA BUILDING STANDARDS CODE

Access is provided to the codes promulgated by OSHPD through the California Building Standards Commission website (<https://www.dgs.ca.gov/en/BSC/Codes>) with active links to each publisher's website for read-only public access versions of the codes. These codes are also known as California Code of Regulations, Title 24.

Part 1, California Administrative Code (CAC)

Part 2, California Building Code (CBC), Volumes 1 and 2

Part 3, California Electrical Code (CEC) Note: Accessed through the National Fire Protection Association (NFPA), however, requires the creation of a user account to view the [Free Access - NFPA 70: 2025 California Electrical Code - NFPA 70 \(2023 NEC®\)](#)

Part 4, California Mechanical Code (CMC)

Part 5, California Plumbing Code (CPC)

Part 6, California Energy Code

Part 7, California Wildland Urban Interface Code

Part 9, California Fire Code

Part 10, California Existing Building Code

C. CODE REFERENCES USED IN THIS ADVISORY GUIDE

California Building Code, Part 2 Volume 2, Title 24, California Code of Regulations

Chapter 17 SPECIAL INSPECTIONS AND TESTS

1705.14.3.1 Special Seismic Certification. [OSHPD 1R, 2 & 5]

California Electrical Code, Part 3, Title 24, California Code of Regulations

Chapter 1 General

ARTICLE 100 Definitions

Chapter 5 Special Occupancies

ARTICLE 517 Health Care Facilities

517.1 Scope

California Mechanical Code, Part 4, Title 24, California Code of Regulations

CHAPTER 3 GENERAL REGULATIONS

325.0 Alternate Source of Power for Safe Temperatures [OSHPD 2]

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SECTION 2 ACRONYMS AND DEFINITIONS

Acronyms, Definitions, and Glossary assist the user in recognizing and identifying various acronyms and terms generally used in the Advisory Guide. Please refer to the *Master Glossary of Acronyms and Definitions* on the HCAI website at <https://hcai.ca.gov/document/master-glossary-of-acronyms-and-definitions/> for a list that includes terms used in this Advisory Guide, as well as in other OSHPD published documents. Other definitions may also be found in the Title 24.

HSC §1418.22 introduced several new terms. Previous Title 24 definitions to existing terms have modified or new definitions added to the following.

Life-Saving Equipment [OSHPD 2]: California Electrical Code, Part 3, ARTICLE 100 Definitions.

Oxygen-Generating Devices [OSHPD 2]: California Electrical Code, Part 3, ARTICLE 100 Definitions.

Alternate Source of Power for Safe Temperatures [OSHPD 2]: California Mechanical Code, Part 4, Section 325.0.

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SECTION 3 ALTERNATE SOURCE OF POWER REQUIREMENTS

All new SNFs submitted for plan review on or after January 1, 2026, shall comply with the requirements in this Section. See Section 4 for additional specific requirements for Existing SNF Additions and Projects for Certain Remodels, and/or Replacement or Addition of Equipment. While it would be acceptable for the required alternate power source to back up cooling equipment, life-saving equipment, and oxygen generating devices with the code mandated emergency power source identified in CEC Section 517.41, this is not a code requirement. Other means can be utilized to provide alternate power to these loads.

The Facility Assessment in Appendix A combined with the Facility Assessment Worksheet in Appendix B, or portions thereof, are required to be submitted to demonstrate compliance with this code requirement. If the facility is not in compliance, these may be useful as a checklist or guide in the preparation and submission of project documents to bring the facility into compliance with CBC Section 1705.14.3.1, CEC Section 517.1, and CMC Section 325.0. Inclusion of a schematic-level design to bring the facility into compliance with this assessment can facilitate a more expeditious review of all subsequent OSHPD submittals for projects related to equipment required to provide safe temperatures for residents, life-saving equipment, and oxygen-generating devices by backing up these loads with alternate power sources, and providing fuel storage for the alternate power sources.

A. HEATING, VENTILATING, AND AIR CONDITIONING (HVAC) SYSTEMS

All HVAC equipment and systems needed to provide a safe temperature to patient areas must be on an alternative source of power and can be in parallel with, or in addition to, the normal power source. Facilities with a central plant will need to identify remote source equipment such as boilers and chillers.

"Safe temperature" under emergency conditions is defined in the Federal Code of Regulations, Title 42, § 483.73(b)(1)(ii)(A) and § 483.10(i)(6) as a temperature range of 71°F to 81°F. The Centers for Medicare & Medicaid Services (CMS) Emergency Preparedness Requirements states, "alternate sources of energy to maintain - Temperatures to protect resident health and safety and for the safe and sanitary storage of provisions."

Furthermore, CMS requires facilities to establish procedures that determine how heating and cooling of their facility will be maintained during an emergency, including when there is a loss of the primary power source. It is noted that facilities are not required to heat and cool the entire building evenly but must ensure safe temperatures are maintained in areas deemed necessary to protect patients, other persons, and for stored provisions. These procedures are included in the Emergency Preparedness Plan pursuant to HSC §1336.3(b) and made available to CDPH.

B. LIFE-SAVING EQUIPMENT

The definition of life-saving equipment lists many pieces of equipment that typically are plugged into electrical receptacles. Life-saving equipment may include but shall not be limited to ventilators, AEDs, crash carts with defibrillators, intravenous therapy equipment, feeding pumps, IV pumps, nebulizer machines, suction equipment, and medication dispensing machines. For those SNFs that admit patients who need to be sustained by electrical life-support equipment, the essential electrical system shall comply with the requirements of CEC Sections 517.29 through 517.35.

C. OXYGEN-GENERATING DEVICES

The definition of oxygen-generating devices identifies two separate approaches; either a system with larger equipment and distribution throughout the building, or individual devices that typically are plugged into electrical receptacles. Oxygen-generating devices may include but shall not be limited to concentrators and positive pressure apparatus as identified in Title 22, California Code of Regulations, Section 51511.

D. ESSENTIAL POWER SYSTEMS

Licensed SNFs in California are required to meet Title 24 requirements. This includes those found in the CEC.

Section 517.41(A.1) requires two independent power sources be provided for all essential loads in nursing homes and limited care facilities. These include:

- 1) A normal source generally supplying the entire electrical system loads.
- 2) One or more alternate (essential) sources.

Section 517.42 requires that essential electrical systems for these facilities be divided into the following (two) branches:

- 1) Life Safety Branch - configured so that all functions listed below shall be automatically restored to operation within 10 seconds after interruption of normal power.
 - Illumination of the means of egress.
 - Lighting of the exit and directional signage.
 - Fire detection and alarm system.
 - Non-flammable medical gas systems and vacuum systems alarms.
 - Hospital emergency communication systems.
 - Sufficient lighting in dining and recreation areas to provide illumination to exit ways.
 - Task lighting, battery charger, and selected receptacles in generator set location.
 - Elevator control, communication, and lighting.

- 2) Equipment Branch - configured so that all functions listed below shall be automatically restored to operation at appropriate time-lag intervals following the restoration of the life safety branch to operation.
 - Task illumination and selected receptacles in the following:
 - Patient care spaces.
 - Medication preparation spaces.
 - Pharmacy dispensing areas.
 - Nurse stations.
 - Supply, return, and exhaust ventilating systems for airborne infectious isolation rooms.
 - Sump pumps.
 - Smoke control and pressurization systems.
 - Kitchen hood supply or exhaust systems.

In addition, the following equipment shall have either automatic or manual connection capabilities:

- Heating equipment to provide heating for patient rooms.
- Elevators.
- Additional illumination, receptacles, and equipment shall be permitted to be connected to the equipment branch.
- *Subacute SNF's that have Category 1 spaces (i.e., patients who need to be sustained by electrical life-support equipment) shall have a type 1 emergency system that meets the CEC requirements in Sections 517.29 through 517.35.

There are new code requirements in Section 517.1(B) for equipment in SNFs requiring backup by alternate power sources which are above and beyond previous code requirements for alternate power at SNFs for loads, namely:

- 1) Equipment required to provide the safe temperature range for residents,
- 2) Life-saving equipment, and
- 3) Oxygen-generating devices.

These new requirements are in addition and can be connected to the essential electrical system or be provided separate from the code mandated essential systems identified in Section 517.42 for standard SNFs and in Section 517.29 for subacute SNFs.

E. POWER SOURCES

An onsite essential and alternate power source shall conform to one or more of the following requirements in the CEC.

- 1) Article 517, Section 517.29 for subacute SNF units

- 2) Article 517, Section 517.40 Type 2 Essential Electrical Systems for Nursing Homes and Limited Care Facilities [OSHPD 2], Correctional Treatment Centers and Acute Psychiatric Hospitals [OSHPD 4 & 5] and Section 517.41 Required Power Sources.
- 3) Article 701 Legally Required Standby Systems
- 4) Article 705 Interconnected Electric Power Production Sources

F. ACCEPTABLE OUTAGE DURATIONS

- 1) Life-Saving Equipment and Oxygen Generating Devices are required to be restored to power within 10 seconds of failure of normal power source.
- 2) Cooling and heating equipment will be restored to power within sufficient time to maintain temperatures between 71°F to 81°F.

G. ONSITE FUEL STORAGE

There is also a new code requirement for onsite fuel storage sufficient to allow the facilities to provide a safe environment for inhabitants for a period of 96 hours. The law states that facilities that use a generator, batteries, or a combination of batteries in tandem with a renewable electrical generation resource as their alternative source of power, shall store sufficient fuel onsite to maintain generator operation for no less than 96 hours or make arrangements for fuel delivery for an emergency event. Note: the onsite fuel storage shall not be less than 6 hours. Where a facility pursues the option to utilize fuel delivery to supplement the onsite fuel to meet the 96-hour requirement, the fuel tank should be sized based on the capacity and capability of the fuel delivery used. The generator is required to remain operational during the 96 hour time period. Inadequate tank size would require delivery intervals that are not feasible.

If fuel is to be delivered during an emergency event, the facility shall ensure that fuel will be available with no delays. The option to arrange for delivery of additional fuel for an emergency event will need to be submitted to OSHPD and forwarded to CDPH for final approval. Fuel delivery will need to be arranged to maintain continued operation for the 96-hour duration. The facility should confirm the timeframe of fuel delivery from when the request is made. The minimum tank size will need to consider delivery timeframe and availability of additional deliveries if tank size requires more than one delivery to meet the 96 hour run time.

H. SPECIAL SEISMIC CERTIFICATION

Special Seismic Certification (SSC) is required for life-safety components, such as emergency and standby power systems, per CBC Section 1705.14.3.1. SSC is also required to ensure that resources utilized to provide alternate power for the loads now required by law will remain functional “during power outages that may result from a public safety power shutoff, an emergency, a natural disaster, or other cause.” These sources and distribution equipment would include:

- Generators and turbines.

- UPS and batteries.
- Renewable electrical generation and control equipment.
- Panelboards as defined in the CEC Article 100.
- Manual and automatic transfer switches.
- Switchgear and switchboards.

Note: SSC is required for generators, batteries, or a combination of batteries in tandem with a renewable electrical generation facility that are used as alternative source(s) of power. Please see [PIN 55 - Special Seismic Certification Preapproval \(OSP\)](#) for further details of SSC requirements.

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SECTION 4

EXISTING SKILLED NURSING FACILITY ADDITIONS AND PROJECTS FOR CERTAIN REMODELS, AND/OR REPLACEMENT OR ADDITION OF EQUIPMENT

APPLICABLE SNF PROJECTS

SNF projects submitted to OSHPD after January 1, 2026 will be reviewed to determine whether the new requirements in Section 3 are applicable to their project. The review will include an informational comment for designs that do not address the alternate source of power requirements; however, enforcement will not occur until sometime in the future HSC §1418.22(f). The kinds of projects to which the requirements apply include, but are not limited to, the following:

- 1) Remodel projects, such as:
 - Adding or converting to SNF beds in an existing SNF.
 - Replacement of an HVAC system serving patient areas.
 - Addition of a new HVAC system serving patient areas.
 - Replacement of a generator.
 - Addition of a generator.
 - Addition or changes to on-site fuel storage.
 - Addition or changes to an alternate source of power.
 - Adding or replacing lifesaving equipment or oxygen generating devices.
- 2) Additions: An addition to a SNF that adds new patient beds or patient areas.

Unless the facility can demonstrate the requirements for Alternate Power for HVAC Systems, Life-Saving Equipment, and Oxygen-Generating Devices for the projects listed above are met through an assessment and worksheet as detailed in Appendix A and Appendix B, the facility will need to provide this capability.

A. HVAC SYSTEMS

In addition to the requirements for HVAC replacement in OSHPD's [How - To Guide 4, Expedited Building Permit Guide for Roof-Mounted HVAC Unit Replacement](#), or other building standards for HVAC equipment that is not roof-mounted, mechanical equipment required to maintain a safe temperature for residents must be powered by an alternate power source. Refer to CMC Section 325.0.

B. LIFE-SAVING EQUIPMENT

Subacute services within SNFs are already required to have emergency (red) receptacles at patient beds that could be utilized to provide power to bedside life-saving equipment in the event of a utility outage. For other SNFs, if life-saving equipment is provided, these systems must be backed up by alternate power.

C. OXYGEN-GENERATING DEVICES

Subacute services within SNFs are already required to have oxygen-generating devices connected to emergency power. For other SNFs, if they are provided, they must be backed up by alternate power.

D. ALTERNATE POWER SOURCE

There are new code requirements for SNFs that identifies equipment required to be backed up by alternate power sources which can be found in CEC Section 517.1(B) namely:

- 1) Equipment required to provide the safe temperature range for residents,
- 2) Life-saving equipment, and
- 3) Oxygen-generating devices.

The code does not specifically require that these systems (cooling, lifesaving, and oxygen-generating equipment) be backed up by essential power as can be seen above but does require that these items are backed up by an alternate power source. In the past the only loads required to be backed up by alternate power (essential power) were identified in Sections 517.43 and 517.44. The new loads identified in Section 517.1(B) are not included in the list of equipment required to be fed by essential power. So, for most existing facilities, cooling equipment, life-saving equipment and oxygen generating devices are not fed by essential power. For most existing SNF facilities there is insufficient capacity in the existing essential electrical system to support these new loads which are required to be backed up by an alternate power source.

For existing SNFs, an assessment can be provided to determine if there is life-saving equipment or oxygen-generating devices at each facility and how these loads are fed. Similarly, the assessment can be used to identify mechanical equipment required to cool patient care spaces and provide information on the existing emergency generator at the site. All of this information can be used to determine the “best” approach to bring facilities into conformance with the CEC.

In an effort to help with this process, OSHPD is providing three potential electrical system modifications. See Appendix C for Electrical Distribution Systems Solutions.

E. SPECIAL SEISMIC CERTIFICATION (SSC)

If a new alternate power system is required, the equipment and components must be seismically certified per CBC Section 1705.14.3.1.

Please see [PIN 55 - Special Seismic Certification Preapproval \(OSP\)](#) for further details of SSC requirements.

PROJECT SUBMITTAL INSTRUCTIONS

In addition to code citations listed in this Advisory Guide, as with all construction, remodeling and alteration of SNF buildings and structures are required to be designed in conformance with applicable codes as noted in [CAN 1-0 Enforceable Codes](#).

For those projects which are affected by local planning and zoning, evidence of approval is required as part of the submittal to OSHPD. See OSHPD [CAN 2-0 Jurisdiction](#).

The Assessment in Appendix A and Worksheet in Appendix B of this Advisory Guide, or portions thereof, may be useful as a checklist or guide in the preparation and submission of project documents to aid in determining compliance with CBC Section 1705.14.3.1, CEC Section 517.1, and CMC Section 325.0. Inclusion of this assessment with all OSHPD submittals for projects related to equipment required to provide safe temperatures for residents, for life-saving equipment, oxygen-generating devices, alternate power sources, fuel storage, and other related projects will facilitate a more expeditious review.

OSHPD projects that are created with an open project number via the eServices Portal that are related to patient care directly or indirectly must have a functional program (refer to CAC Section 7-119), and either a preliminary submittal (refer to CAC Section 7-123) or final submittal (refer to CAC Section 7-125), to be received by the Office within 10 days. Open OSHPD project numbers not accompanied by a submittal within 10 days of the creation of said numbers will be cancelled.

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APPENDIX A SNF [OSHPD 2] HSC §1418.22 FACILITY ASSESSMENT REQUIREMENTS

To show compliance with the law's requirements, SNFs will need to submit a Facility Assessment Online Application to OSHPD. This online application requires design teams to upload a unique assessment (or facility report) substantiating compliance or presenting proposed remediation on non-compliant systems. OSHPD will review the whole Facility Assessment submittal, and if approvable, forward to CDPH for review.

The following are systems, equipment, and devices that must be addressed in the unique assessment uploaded to the Facility Assessment Online Application:

HVAC Systems – The assessment should be filled out to document that the facilities can provide temperature ranges of 71°F to 81°F with existing installed equipment. Next, the survey will need to investigate if these temperatures can be maintained. OSHPD will review for compliance using the same standards required by CMS; namely the facilities will need to show that they have established procedures that determine how heating and cooling of their facility will be maintained during an emergency for 96 hours, including when there is a loss of the primary power source. It is noted that facilities are not required to heat and cool the entire building evenly but must ensure safe temperatures are maintained in areas deemed necessary to protect patients, other persons, and stored provisions.

Life-Saving Equipment – The initial facility assessment should clarify what, if any, life-saving equipment exists at each facility. Existing life-saving equipment should be identified with an explanation and documentation of how this equipment will remain functional during a power outage for 96 hours. If the existing system does not meet the requirements of HSC §1418.22 this should be stated along with the proposed remediation to bring the facility up to the requirements of the law.

Oxygen-Generating Devices – The initial facility assessment should clarify what, if any, oxygen-generating equipment exists at each facility. Existing oxygen-generating equipment should be identified with an explanation and documentation of how this equipment can remain functional during a power outage for 96 hours. If the existing system does not meet the requirements of HSC §1418.22, this should be stated along with the proposed remediation to bring the facility up to the requirements of the law.

Though CDPH will regulate and inspect compliance with HSC §1418.22, OSHPD will review a facility's assessment for compliance and review/comment on the proposed remediation of non-compliant facilities. OSHPD has developed an assessment process to assist in determining compliance. Instructions for submission are presented in the [SNF Alternate Source of Power Assessment for Skilled Nursing Facilities User Guide](#).

The [SNF Alternate Source of Power Assessment](#) is the process implemented to allow a facility to submit an assessment to demonstrate code compliance with HSC §1418.22. The online application involves a series of questions regarding a facility's heating system(s), cooling systems(s), life-saving equipment, oxygen-generating devices,

emergency generator(s), and alternate power source(s). The questions are intended to make visible the various systems that must be compliant with HSC §1418.22. Based on the client's answers to these questions, required documentation will be identified.

Once submitted through the OSHPD eServices Portal online submission, OSHPD will review submitted documentation and decide if the facility complies with HSC §1418.22. When determined compliant, OSHPD will send the assessment information to CDPH requesting concurrence with the determination. (Note: Historical weather data may be required to substantiate temperate climates as related to adequacy of the existing or proposed systems to verify safe temperatures.) If CDPH concurs, the assessment application will be closed with compliance and OSHPD involvement with HSC §1418.22 is complete. At this phase of the evaluation process, CDPH will survey the facility and notify said facility of the next steps for filing the form showing compliance. If CDPH does not concur with the determination of compliance, a meeting with stakeholders will be held to find a resolution.

The assessment will need to include floor plans of the building to show area of coverage for heating and/or cooling systems and location of units. Where the heating or cooling sources are remotely located from the fan unit, the equipment and location will also need to be shown. Rooms or areas will need to be labeled to indicate function of spaces to identify patient care areas. Where new work is needed to bring the facility into compliance, the documentation shall provide a basis-of-design level of proposed remediation to enable the facility to comply with the law. OSHPD will review the assessment and proposed remediation plan and provide feedback as to the accuracy of the assessment and if the proposed solution will bring the facility into code compliance.

The coverage of the heating and/or cooling systems shall provide a safe temperature for all patient care areas. If the facility chooses to implement a cooling center or partially cooled patient care areas, the assessment will need to include documentation to demonstrate the cooling center shall provide safe temperatures for patients. The assessment will be based on the facility's emergency preparedness plan to provide a safe temperature to patients during loss of normal power. OSHPD will evaluate the equipment and cooled patient areas' ability to meet the safe temperature requirement. However, the final determination for the emergency preparedness plan will be subject to CDPH acceptance. Geographic location will determine the number of hours a facility will need to provide cooling to maintain safe temperatures. Where the location is only subject to a small number of hours of required cooling, a transient space may be acceptable to house patients. Spaces such as a day room may satisfy the cooling requirement for a short duration. Areas with a longer duration or overnight temperatures outside of the safe temperature range will need to provide cooling for sleeping spaces. Facilities will be evaluated on a case-by-case basis based on climatic conditions at the facility's location.

Existing Buildings Without Cooling Equipment

Where the building or a portion of the building does not have cooling equipment, it will need to be demonstrated that the building will meet the safe temperature requirements. Facilities may demonstrate compliance in one of three ways:

- 1) A building load analysis prepared by a design professional, showing that the building can maintain safe interior temperatures without mechanical cooling at the ASHRAE 1% design condition. This method typically requires a building analysis done in a cooling load software package completed by a design professional. It can be done by manual calculation, but it is quite involved.
- 2) ASHRAE Climatic Design Data where the 1% design condition outside temperature is 75°F or less for the location of the facility.
- 3) Local weather-station data or temperature data logging at the location demonstrating that the outside temperature does not exceed 75°F for more the 87 hours per year (or 1% of 8760 hours/per year). Not every location within the state has nearby ASHRAE data. This would allow localized data demonstrating equivalence to ASHRAE Climatic Design data.

Any of these methods is acceptable, and facilities may choose the approach that best fits their circumstances.

Case-by-Case Review

Each facility's assessment is reviewed individually, taking into account the local climatic conditions and the documentation submitted. The design team should provide the supporting data (load analysis, ASHRAE station data, or localized data monitoring). The format of the submission could be the building load analysis software output reports, a report summarizing the ASHRAE Climatic Design Data for the location listing the facility location and distance to the closest ASHRAE Data location, or a report providing analysis of localized weather station data including the data for a full year (8,760 hours). The Office will evaluate the submission based on the criteria in this guide.

Weather Data Source

For both compliance options above, the ASHRAE station data is the appropriate source for determining whether a facility's location meets the criteria for a temperature-variance exemption. The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) provides weather data at specified stations throughout California. The key value is the 1.0% Design Dry Bulb temperature. The 1% condition means that for only 1% the year (87 hours out of 8760 hours per year) the outside temperature will exceed the listed value. This a typical design condition for designing building cooling systems.

If desired, the facility can submit an assessment to document what aspects of the facility do comply and what aspects do not comply with HSC §1418.22. This voluntary assessment for facilities that are known to be out of compliance can also include a proposed remediation plan. If HCAI determines the facility to be non-compliant with HSC §1418.22, the facility will be notified with the findings and OSHPD will comment on the proposed remediation plan. If the facility does not meet code, remediation of the non-compliant systems will be necessary.

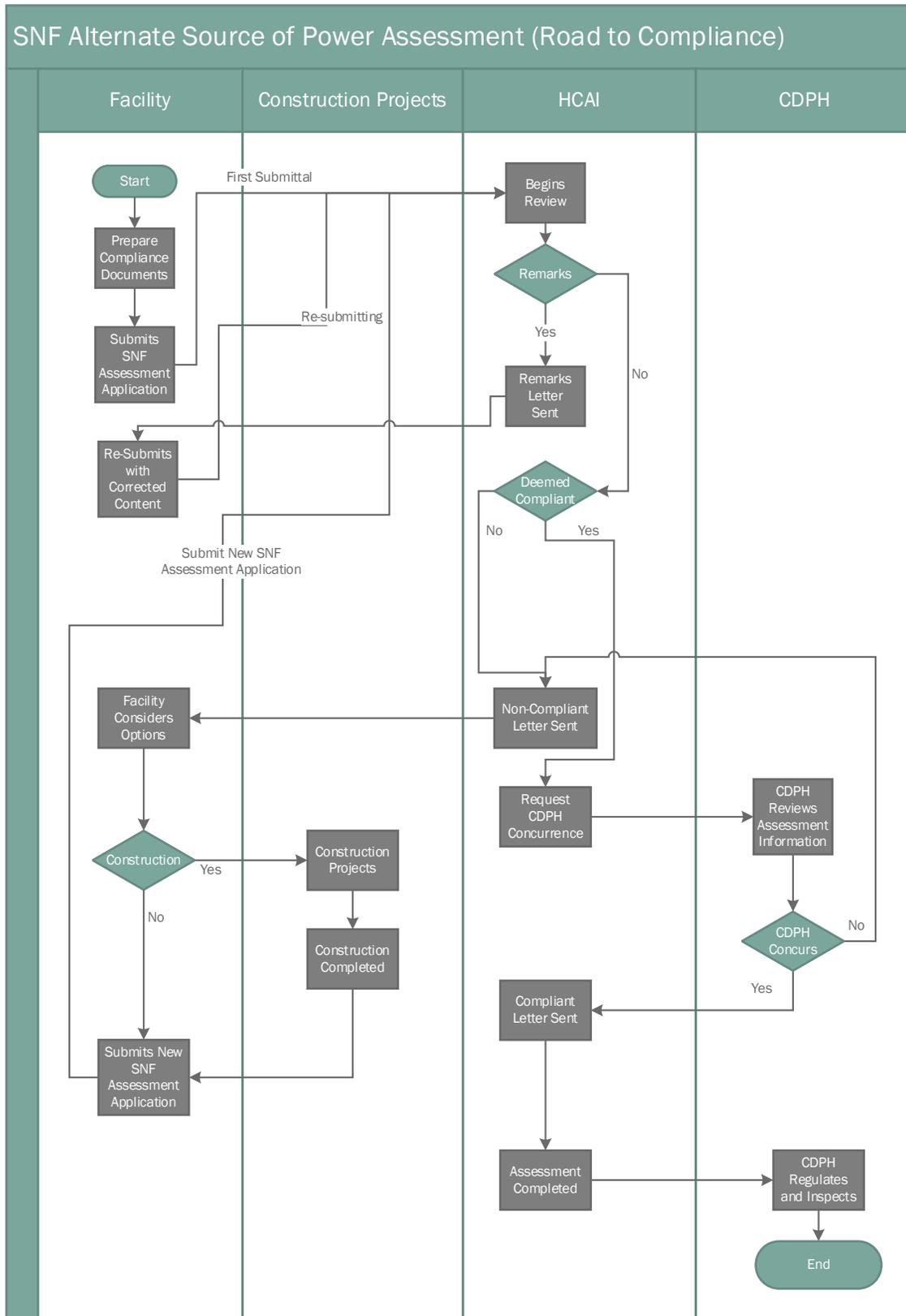


Figure 1 - SNF Alternate Source of Power Assessment Flow Chart

A. WHEN NEW WORK IS REQUIRED

If a facility is determined to be non-compliant, the assessment is closed without compliance. The assessment is not a construction project, so remediation of non-compliant systems must be submitted to OSHPD in the form of construction projects utilizing the [Application for New Project](#) via the eServices Portal. [The Application for New Project User Guide](#) can be found at [New Project User Guide](#).

Once all construction projects for remediation are complete and closed, the facility will need to submit a new [SNF Alternate Source of Power Assessment](#) application with documentation to substantiate assertions of compliance by the facility. If determined to be compliant, the process will be complete.

If a facility is determined to be non-compliant after construction projects are closed, additional construction projects will be needed to bring the facility into compliance with HSC §1418.22 and an additional [SNF Alternate Source of Power Assessment](#) will need to be submitted to determine if the facility has been brought into compliance. This process will continue until compliance is reached.

B. CODE IMPLICATIONS

While HSC §1418.22 introduces new requirements for alternate power source(s) to support loads previously not required to be backed up, there are existing codes that provide requirements for new equipment and resources that might be utilized to meet these requirements. Depending on what resources are used and how back-up power is provided, there are a myriad of code requirements that might come into play. In addition to generators, the following is a partial list of other acceptable alternate power sources:

Microgrid White Paper Codes/Regulations - Applicable Codes Matrix							
		Microgrid Power Source					
		Solar (PV's)	Wind	Fel CIs	Cgen	Energy Storage	UPS
Codes/Requirements							
1	CARB - California Air Resources Board - Air Quality Requirements				x		
2	CPUC - California Public Utility Commission (Rule 21)	maybe	maybe	x	x	maybe	no
3	OSHPD CAN 2-0 Local Approval	x	x	x	x	maybe	no
4	California Building Code	Only ifn OSHPD building and/or serving as alternatource					

Microgrid White Paper Codes/Regulations - Applicable Codes Matrix							
		Microgrid Power Source					
		Solar (PV's)	Wind	Fuel Cells	Cogen	Energy Storage	UPS
5	California Fire Code						
5a	1206 Electrical Energy Storage Systems					x	X
5b	1206.2 Stationary Storage Battery Systems					x	X
5c	1204 Photo Voltaics	x				x	
5d	1205 Fuel Cell (NFPA 53 adopted by reference)			x			
6	California Electrical Code						
6a	517 Healthcare Facilities	Only if in OSHPD building and/or serving as alternate source					
6b	690 PV Systems	x				x	
6c	692 Fuel Cell Systems			x		x	
6d	694 Wind Electric Systems		x			x	
6e	700 Emergency power					x	X
6f	705 Interconnected Electric Power Production Sources	x	x	x	x	x	
7	NFPA 30 - Flammable and Combustible Liquids Code			x	x		
8	NFPA 37 - Stationary Combustion Engines and Gas Turbines			x	x		
9	NFPA 54 - National Fuel Gas Code			x	x		
10	NFPA 58 - Liquid Petroleum Gas Code			x	x		
11	NFPA 59A - Production/Storage/Handling of Liquefied Natural Gas LNG			x	x		

Microgrid White Paper Codes/Regulations - Applicable Codes Matrix							
		Microgrid Power Source					
		Solar (PV's)	Wind	Fuel Cells	Cgen	Energy Storage	UPS
12	NFPA 99 - Healthcare Facilities Code	x	x	x	x	x	
13	NFPA 110- Emergency and Standby Power	x	x	x	x	x	
14	NFPA 111- Stored Electrical Energy Emergency and Standby Power Systems					x	
15	NFPA 400 - Hazardous Materials Code			x	x	x	
16	NFPA 853 - Installation of Stationary Fuel Cell Power Systems			x			
17	NFPA 855 - Standard for the Installation of Stationary Energy Storage Systems					x	
18	Centers for Medicare & Medicaid Services (CMS)	x	x	x	x	x	
18a	2012 NFPA 99 - Healthcare Facilities Code						
18b	2012 NFPA 101 - Life Safety Code						

These codes/standards address:

- Air quality requirements.
- Rule 21 requirements for utility interconnection.
- Requirements for local approval for siting of equipment in regard to aesthetics and accessibility.
- Requirements for housing of equipment - seismic certification and restraint for equipment serving and located in HCAI/OSHPD facilities.
- Fire resistance rating requirements.
- Location of equipment in relation to the healthcare facility and property boundaries.

- Requirements for the various on-site power generation units and fuel storage systems.
- Underground and above ground fuel tank requirements.
- Requirements for electrical wiring and equipment used in connection with energy systems.
- Requirements for electrical systems for healthcare buildings, including specific requirements for various on-site power generation systems and energy storage systems.
- Emergency power, Standby power and interconnected Electric Power Production Source requirements.

We recommend that Design Professionals use this as a checklist to help ensure that all aspects of code are considered for the planning and design of new systems to meet HSC §1418.22 requirements.

Please also see the following reminder lists:

<https://hcai.ca.gov/document/fls-reminder-list-above-ground-fuel-storage-cbc/>

<https://hcai.ca.gov/document/fls-reminder-list-epss-generator-cbc/>

<https://hcai.ca.gov/document/fls-reminder-list-underground-fuel-storage-cbc/>

<https://hcai.ca.gov/document/fls-reminder-list-fire-authority-approvals-cbc/>

<https://hcai.ca.gov/document/rem-list-fire-life-safety-construction-2016-cbc/>

Please also see applicable PINs and CANs:

<https://hcai.ca.gov/construction-finance/codes-and-regulations/#CANs>

<https://hcai.ca.gov/construction-finance/codes-and-regulations/#PINs>

C. SUBMITTAL INSTRUCTIONS

Submittal Instructions:

The application for the [SNF Alternate Source of Power Assessment](#) process is an online submission which is accessible via the [eServices Portal - eClient Access web page](#). The user guide can be found at [SNF Alternate Source of Power Assessment User Guide](#). The online application includes a series of questions to confirm that the various systems at a facility either comply or do not comply with HSC §1418.22. The user guide contains step by step instructions for submitting the request for assessment including the assessment questions.

As the responses to the questions are entered, potential requirements will be compiled. These requirements are intended to provide a list of documentation needed to substantiate compliance. Information about the heating, cooling, emergency

generator(s), and alternate power source(s) systems in use at the facility is entered into the application.

Once the application for [SNF Alternate Source of Power Assessment](#) is submitted, a report is available that displays the results. It will include the questions, answers, and requirements, along with the heating, cooling, emergency generator, and alternate power source(s) information entered into the application. The User Guide explains how to print the report.

The assessment and review will focus on the following to determine compliance with HSC §1418.22:

- 1) Heating System
- 2) Cooling System
- 3) Life-Safety Equipment (Ventilators, AED, Crash Carts)
- 4) Oxygen-Generation Devices (Concentrators, Positive Pressure Apparatus, and large-scale oxygen generation)
- 5) Emergency Generator(s)
- 6) Alternate Power Source(s) (Other than generator)

The following are necessary attachments for the review to return a compliant assessment:

- 1) Floor plan showing location of all systems and area of coverage.
- 2) Documentation substantiating compliance for each system listed above with HSC §1418.22.
- 3) Electrical single line diagram.
- 4) Local approvals as required.

Without this information, an assessment of the proposed solution will not be able to be made.

Optional: Documentation of existing conditions and proposed remediation to bring the systems compliant.

If it is already known that certain systems are not compliant with HSC §1418.22, the client can still complete a submission of the assessment and include schematic or narrative remediation plans to receive the review results.

Note: OSHPD has developed a worksheet and questions to assist in preparing for the submission of an online request for assessment. See Appendix B for the worksheet and questions from the online assessment.

Northern California, contact:

Department of Health Care Access and Information
Office of Statewide Hospital Planning and Development
2020 W. El Camino Avenue, Suite 800
Sacramento, CA 95833
(916) 440-8300 phone or (916) 274-0102 fax

Southern California, contact:

Department of Health Care Access and Information
Office of Statewide Hospital Planning and Development
355 South Grand Avenue, Suite 1900
Los Angeles, CA 90071
(213) 897-0166 phone or (213) 217-8511 fax

If you need assistance in submitting the application, contact the eSP Help Desk at (916) 440-8400 or eserv@hcai.ca.gov.

APPENDIX B
SNF [OSHPD 2] HSC §1418.22 FACILITY WORKSHEET

Appendix B is provided as a worksheet meant to assist design teams with compiling information required by the Facility Assessment Online Application prior to starting a submittal. (Like other OSHPD submittals, Facility Assessment Online Applications are considered temporary records; temporary records are automatically purged from the system after 30 days.) The online assessment demonstrates that the facility complies with HSC §1418.22.

Date:	
Facility ID:	
Facility Name:	
Building Number(s):	BLD-xxxxx
Licensed Beds:	Per BLD-xxxxx
Building Area(s) (SF):	

Heating System Information	
Heating System Type	
Fuel Type	
Cooling System Information	
Cooling System Type	
Power Source	
Emergency Generator	
Make	
Model	
Size (KVA and Voltage)	
Fuel Type	
On-site Fuel Capacity (Hours)	
On-Site Fuel Storage Operating Hours	
Alternate Power Source	
Make	
Model	
Type	
Size (KVA and Voltage)	
Fuel Type	
On-site Fuel Capacity (Hours)	
On-Site Fuel Storage Operating Hours	

Required for SNF Alternate Source of Power Assessment online application:

- 5) Information shown in the Worksheet above.
- 6) Floor Plan/Site Plan showing location of systems and area of coverage.

- 7) Documentation substantiating compliance for all systems covered in HSC §1418.22.

Facility key maps are available: <https://hcai.ca.gov/construction-finance/facility-detail/>

Optional Documents:

- Proposed remediation for non-compliant systems.

SNF Alternate Source of Power Assessment The following questions are part of the online assessment application				
Section	Topic	Question Number	Question	Yes or No
Safe Temperatur for Resident Life-savi Equipment	Heating Equipment	1	Are there heating systems currently in place at the facility?	
		2	Does the existing heating system maintain the resident space at or above 71°F when utility power is reliable?	
		3	Is a floor plan showing existing heating units and area of coverage included in assessment submittal?	
		4	Is heating system equipment connected to emergency power?	
		5	Is the heating system equipment connected to an alternate power source (not emergency generator)?	
		6	Will the electrical components of heating system work in event of utility power outage?	
	Cooling Equipment	7	Is mechanical cooling provided at the facility?	
		8	Does the existing cooling system maintain the resident spaces at or below 81F when utility power is reliable?	
		9	Is a floor plan showing existing cooling units and area of coverage included in assessment submittal?	
		10	Is cooling system equipment connected to emergency power? (i.e., emergency generator)	
		11	Is the cooling system equipment connected to an alternate power source (not emergency generator)?	
		12	Will cooling system work in event of utility power outage?	
Life-Savi Equipment	Ventilators	13	Are there ventilators using 120V for operation/charging at the facility?	
		13a	Are the ventilators connected to emergency power?	

SNF Alternate Source of Power Assessment The following questions are part of the online assessment application				
Section	Topic	Question Number	Question	Yes or No
	AEDs	13b	Will the ventilators work in event of utility power outage?	
		14	Are there automated external defibrillators (AED) using 120V for operation/charging at the facility?	
		14a	Are the AED connected to emergency power?	
		14b	Will the AED work in event of utility power outage?	
Life-Savi Equipment (continued)	Crash Carts	15	Are there crash carts using 120V for operation/charging at the facility?	
		15a	Are the crash carts connected to emergency power?	
		15b	Will the crash carts work in event of utility power outage?	
	Other Equipment	16	Are there other life-saving equipment at the facility?	
		16a	Are the other life-saving equipment connected to emergency power?	
		16b	Will the other life-saving equipment work in event of utility power outage?	
Oxygen-Generati Devices	Concentrators	17	Are there concentrators using 120V for operation/charging at the facility?	
		17a	Are the concentrators connected to emergency power?	
		17b	Will the concentrators work in event of utility power outage?	
	Positive Pressure Apparatus	18	Are there Positive Pressure Apparatus (PPA) using 120V for operation/charging at the facility?	
		18a	Are the PPA connected to emergency power?	
		18b	Will the PPA work in event of utility power outage?	
	Oxygen System	19	Does the facility utilize an on-site, large-scale oxygen- generating systems?	
		19a	Are the oxygen generation devices connected to emergency power?	
		19b	Will the oxygen generation devices work in event of utility power outage?	
Existing Generator()	Emergency Generator(s)	20	Does your facility currently have a permanent on-site emergency generator?	
		20a	Does the emergency generator have 96 hours of on-site fuel storage?	

SNF Alternate Source of Power Assessment The following questions are part of the online assessment application				
Section	Topic	Question Number	Question	Yes or No
		20b	Does the emergency generator have a minimum of 6 hours of on-site fuel storage?	
		20c	Does the facility have a fuel delivery agreement to supply the generator(s) with fuel to comply with the 96 hours operational requirements of HSC §1418.22?	
Existing Alternate Power Source	Alternate Power Source (DER)	21	Does your facility currently have a permanent on-site alternate power source (not including emergency generator)?	
		21a	Does the alternate power source backup the entire normal service?	
		21b	Do all components of the alternate power source have special seismic certification?	
		21c	Does the alternate power source have 96 hours of on-site fuel storage?	
		21d	Does the alternate power source have a minimum of 6 hours of on-site fuel storage?	
		21e	Does the facility have a fuel delivery agreement to supply the alternate power source with fuel to comply with the 96 hours operational requirements of HSC §1418.22?	
Existing Systems	Equipment	22	Is an electrical single line diagram provided in submittal showing utility service, emergency and alternate power source(s) and distribution to HVAC equipment, life-saving equipment, and oxygen-generating device(s)?	

APPENDIX C ELECTRICAL DISTRIBUTION SYSTEM SOLUTIONS

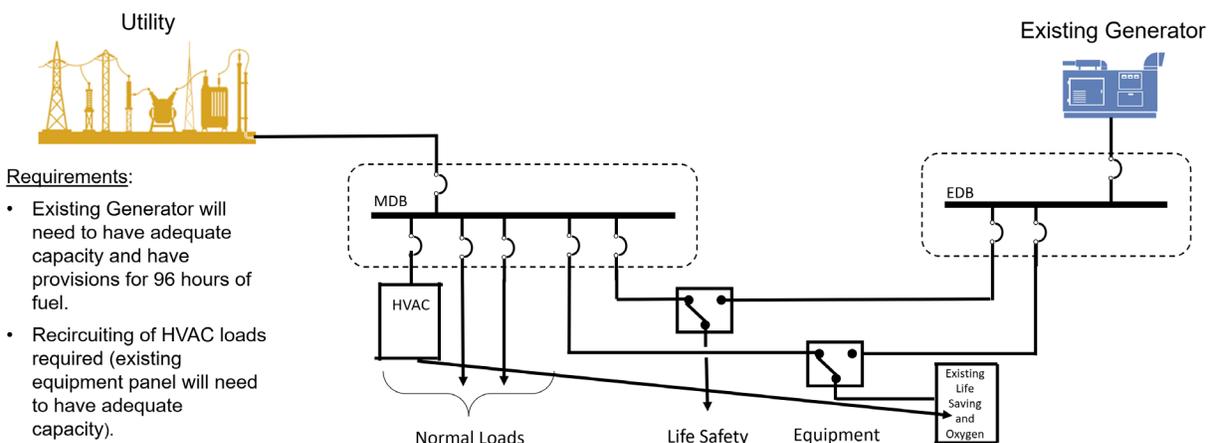
The law clearly includes a requirement to have an alternate power source to back up:

- Equipment required to provide safe temperature for residents (namely cooling),
- Life-saving equipment, and
- Oxygen-generating devices.

However, the law does not specifically require that these systems be backed up by essential power. To assist the decision makers in finding the “best” approach to bring existing facilities into conformance with HSC §1418.22, OSHPD is providing the following three potential electrical system modifications:

- 1) Add New Loads to Existing or Replacement Emergency Generator:
 - CEC Section 517.29 through 517.30 for SNF Subacute Units
 - CEC Section 517.40 and 517.41, *Essential Electrical Systems for Nursing Homes and Limited Care Facilities [OSHPD 2]*
- 2) New Alternate Source (Generator): CEC Article 701 Legally Required Standby Systems
- 3) New Healthcare Microgrid: CEC Article 705 Interconnected Electric Power Production Sources

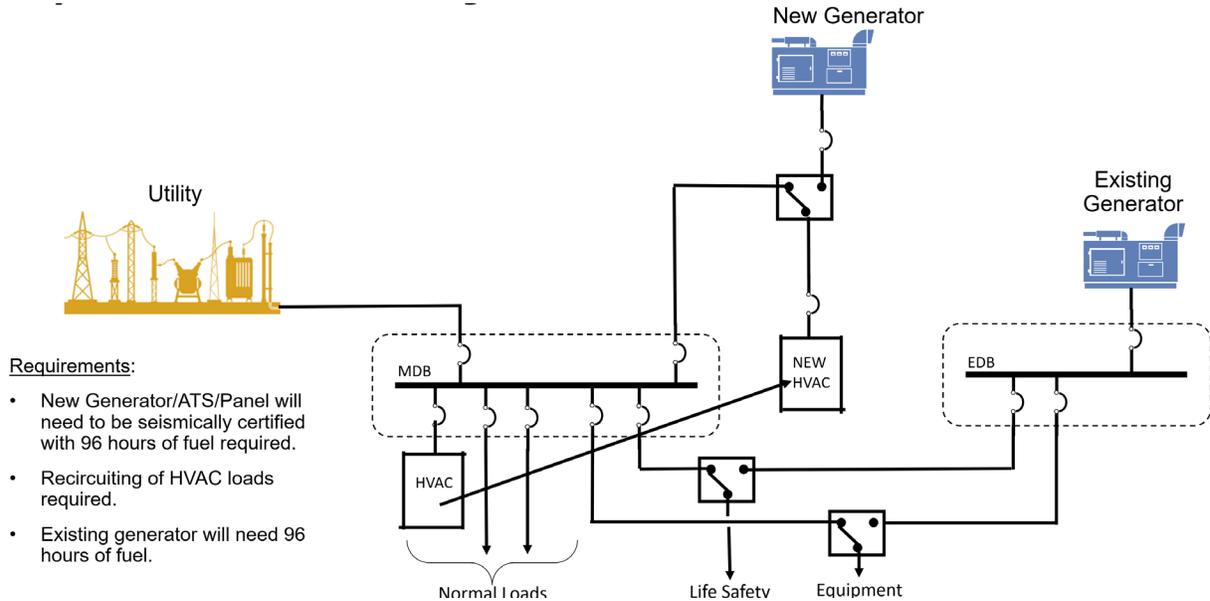
1) Existing Generator



Add New Loads to Existing or Replacement Emergency Generator: Where an existing or replacement emergency generator meets Title 24, California Electrical Code, Part 3, Article 517 (Health Care Facilities) requirements and has adequate capacity to support the existing essential loads and added loads required by HSC §1418.22 to maintain 96 hours of operation, the existing system could be considered compliant if the electrical distribution system is confirmed or modified to feed all loads associated with HSC

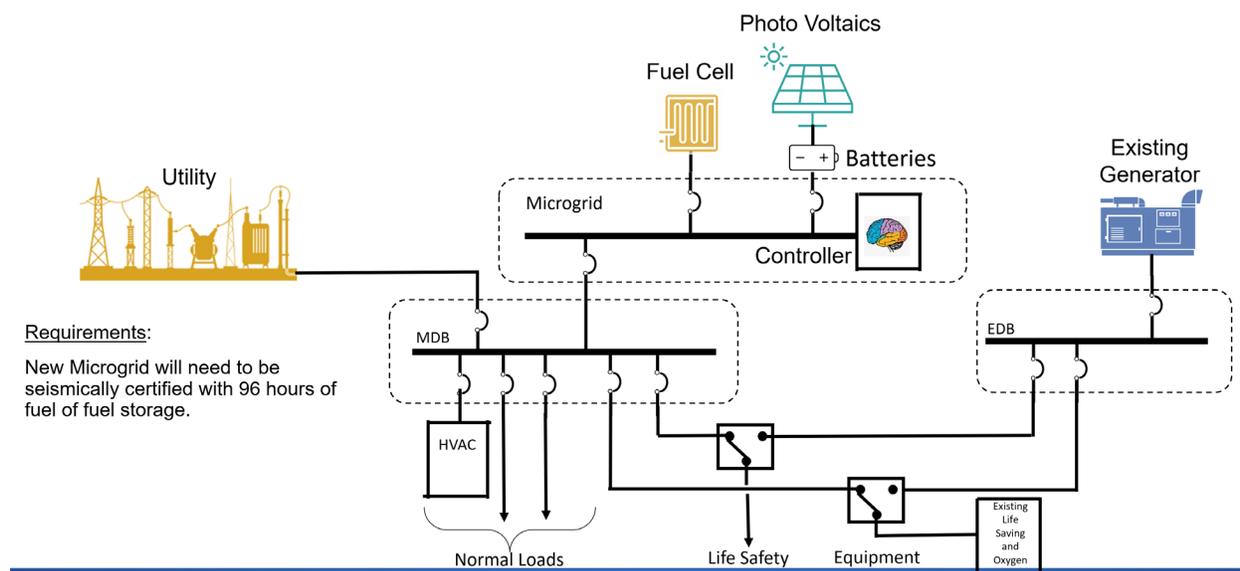
§1418.22 (i.e., equipment required for safe temperatures, life-saving equipment, and oxygen-generating devices as identified above). For this scenario the replacement emergency generator, and distribution equipment including any new panels feeding the required loads, would need to be seismically certified. The emergency generator(s) will need to have provisions for 96 hours of fuel.

2) New Standby Generator



New or Additional Generator: A new generator and associated equipment could be introduced into the system to feed new or additional loads necessary to meet HSC §1418.22 requirements. The new generator and equipment shall meet Title 24, California Electrical Code, Part 3, Article 701 (Legally Required Standby Systems) requirements have special seismic certification, and fulfill the 96-hour on-site fuel requirements. The new standby system could be utilized to feed the cooling equipment, life-saving equipment, and oxygen-generating devices as identified above. In this scenario, the existing distribution system would need to be modified to transfer all loads from existing equipment to new equipment. The existing emergency generator would need to have 96 hours of fuel provisions.

3) New Microgrid Parallel with Utility



New Healthcare Microgrid: A new healthcare microgrid could be introduced to the system with any combination of generator(s), turbine(s), fuel cell(s), photovoltaics, battery storage system(s), or other on-site Distributed Energy Resources (DER's) and be configured to parallel with a normal distribution board at the facility. The new system components shall meet requirements of Title 24, California Electrical Code, Part 3, Article 705 (Interconnected Electric Power Production Sources), have special seismic certification, and fulfill the 96-hour fuel requirement. For this scenario, all new equipment, including energy producers, will need to be seismically certified. This approach would utilize the existing normal distribution system backed up by the alternate power source (microgrid) to feed all loads including the cooling equipment, life-saving equipment, and oxygen-generating devices. The existing Essential Electrical System (Title 24, California Electrical Code, Part 3, Section 517.42) will need to remain in operation however, the fuel system will not need to be modified to support 96 hours of run time (existing six (6) hours minimum will be sufficient).

For additional information refer to [Advisory Guide A7 – Microgrids for Healthcare Facilities](#).

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REVISION HISTORY

Version 1.4	March 2026	Assembly Bill 116 changed the compliance date for existing SNFs. The Advisory Guide was reorganized to provide clarity for new SNFs and existing SNF additions and projects for certain remodels and/or replacement or addition of equipment. California Electrical Code articles and sections were updated in the 2025 Triennial Code Adoption Cycle for alignment with the National Electrical Code.
Version 1.3	December 2024	Senate Bill 1511 changed the compliance date to January 1, 2026.
Version 1.2	July 2024	Clarify safe temperature ranges and Federal Code of Regulations requirements. Clarify how safe temperature ranges can be researched and how they can be achieved. Include Special Seismic Certification requirements. Clarify that an initial assessment is not required, but advisable. The AB 2511, January 1, 2024, due date is for facility compliance, not the assessment submittal.
Version 1.1	June 2023	SNF Backup Power Source changed to SNF Alternate Source of Power. Figure 1 updated. Information about egress lighting and emergency notification equipment added.
Version 1.0	March 2023	First Issued

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