

WELCOME  
Primary Care Clinics (PCC)  
Public Meeting  
June 12, 2025

**THE MEETING WILL START AT 9:00 A.M.**

# Who are we? And what do we do?

## HCAI TEAM HCAI/OSHPD/BSU

**Richard Tannahill – Architect**

Deputy Division Chief, OSHPD/HCAI

[Richard.Tannahill@hcai.ca.gov](mailto:Richard.Tannahill@hcai.ca.gov)

916.440.8393

**Mia Marvelli – Architect, Supervisor**

[Mia.Marvelli@hcai.ca.gov](mailto:Mia.Marvelli@hcai.ca.gov)

916.440.8452

**Larry Enright - Sr. Mechanical Engineer**

[Lawrence.Enright@hcai.ca.gov](mailto:Lawrence.Enright@hcai.ca.gov)

916.440.8482

**Clara Wu – Compliance Officer**

[Clara.Wu@hcai.ca.gov](mailto:Clara.Wu@hcai.ca.gov)

916.440.8439

**Samantha Miller – Sr. Architect**

[Samantha.Miller@hcai.ca.gov](mailto:Samantha.Miller@hcai.ca.gov)

916.440.8492

**Jamie Schnick - Sr. Electrical Engineer**

[Jamie.Schnick@hcai.ca.gov](mailto:Jamie.Schnick@hcai.ca.gov)

213.897.7651

**Simrit Pamma – AGPA**

[Simrit.Pamma@hcai.ca.gov](mailto:Simrit.Pamma@hcai.ca.gov)

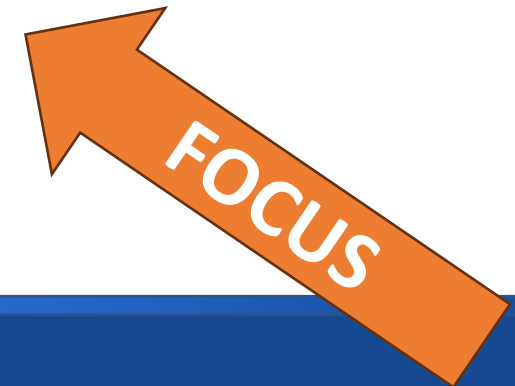
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# Who are we? And what do we do?

HCAI - Department of Health Care Access and Information

Office of Statewide Hospital Planning and Development Building Safety – HCAI

1. Promulgate regulations in Title 24 for Hospitals, Skilled Nursing Facilities, Acute Psychiatric Hospitals
2. HCAI is the building department for these facilities
3. Promulgate OSHPD 3 CLINIC regulations in Title 24, Chapter 12, Section 1226
4. **HCAI has authority to make or modify regulations (building standards) for health care facilities licensed by CDPH, including Primary Care Clinics.**
5. Coordinate with CDPH (licensing), CPCA, oSFM (Fire and Life Safety) and DSA (Access)



# Purpose of the Meeting

**Right-size the PCC requirements** in the California Building Standards Code, Title 24, California Code of Regulations

Challenges PCCs face meeting  
OSHPD 3 regulations

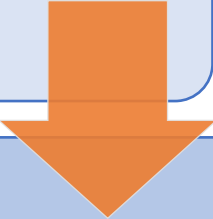
Welcome any input for PCC  
Title 24 building code changes

Explore ways Title 24 can be  
amended so compliance can be  
efficiently accomplished


Update CAN 1-7-2100 Clinics

# What is OSHPD 3?

Title 24 contains the minimum building standards (regulations) for the construction and alteration of buildings and structures in CA . Title 24 is comprised of building, fire, electrical, mechanical, plumbing regulations, energy and sustainable, etc.



HCAI/OSHPD amend Title 24 (Section 1226.6 - [OSHPD 3] CLINICS) for PCCs listed in HSC 1204(a)



CDPH responsible for licensing PCCs and they promulgate Title 22 regulations (points to Title 24 for building standards)

# CBC Section 1226 - Overview

Section 1226.1, 1226.2, 1226.3 Scope, Application and Definitions

**Section 1226.4 General Construction**



FOCUS

Section 1226.5 Outpatient Clinical Services of a Health Care Facility (CDPH license via HSC 1250)

**Section 1226.6 Primary Care Clinics** (CDPH license via HSC 1204(a))



FOCUS

Section 1226.8 Surgical Clinics (CDPH license via HSC 1204(b))

Section 1226.9 Chronic Dialysis Clinics (CDPH license via HSC 1204(b)(2))

Section 1226.10 Rehabilitation Clinics (CDPH license via HSC 1204(b)(3))

Section 1226.11 Alternative Birthing Clinics (CDPH license via HSC 1204(b)(4))

Section 1226.12 Psychology Clinics (CDPH license via HSC 1204.1)

# Section 1226 Scope and Application

**1226.1 Scope.** *The provisions of this section shall apply to primary care clinics, specialty clinics and psychology clinics, licensed by the California Department of Public Health. Primary care clinics include free clinics, community clinics, employee clinics and optometric clinics. Specialty clinics include surgical clinics, chronic dialysis clinics, rehabilitation clinics and alternative birth centers (ABC). This section shall also apply to outpatient clinical services of a hospital when provided in a freestanding building.*

*[Point to Health and Safety Code references (1200, 1204, etc.) or clarify in Sections 1226.5 , 1226.6, 1228, 1226.9, 1226.10, 1226.11, 1226.12]*

**1226.4 General construction.** *Clinics and outpatient clinical services under a hospital license shall comply with the provisions under Section 1224.4, General Construction, where applicable, except as supplemented, amended or modified below.*

*[Better clarify what types of clinics must use 1224.4]*

# Section 1226 Scope and Application

## ***OUTPATIENT CLINICAL SERVICES OF A HOSPITAL***

***1226.5 OUTPATIENT CLINICAL SERVICES OF A HOSPITAL.*** *A licensed hospital may elect to locate certain outpatient services in a freestanding building. To be considered a freestanding building, refer to the California Administrative Code Section 7-111. See Section 309A.5.1 of the California Existing Building Code for eligibility for jurisdiction of the local enforcement agency over freestanding buildings adjacent to hospital buildings.*

*Outpatient clinical services of a hospital provided in a freestanding building are regulated under the banner [OSHPD 3] instead of [OSHPD 1]. These services shall comply with Sections 1226.4.2 through 1226.4.8 and the provisions of this section. Outpatient clinical services of a hospital that are not addressed in the provisions of Section 1226 shall comply with applicable provisions of Section 1224 and/or Section 1228 as if those provisions were repeated in Section 1226.5.*



# Section 1226 Scope and Application

## **PRIMARY CARE CLINICS**

**1226.6 PRIMARY CARE CLINICS.** *Primary care clinics and outpatient clinical services of a hospital providing services equivalent to a primary care clinic shall comply with Sections 1226.4.3 through 1226.4.8 and the provisions of this section.*

*[This might be better located in 1226.5]*

# Section 1226 Scope and Application

## *SPECIALTY CLINICS*

## *SURGICAL CLINICS*

***1226.8 SURGICAL CLINICS.*** *Outpatient surgical clinics, and outpatient clinical services of a hospital providing services equivalent to a surgical clinic, shall comply with Sections 1226.4.2 through 1226.4.8 and the provisions of this section.*

[For consistency, add SPECIALTY CLINICS to distinguish types of clinics. Add HSC references similar to 1226.5]

# PCC Title 24 Regulations

## Table - Overview

**Compare Title 24 and Title 22:** OSHPD developed a T-24 & T-22 comparison table and shared it with the CA Primary Care Association. We receives feedback and incorporate that information into the OSHPD Comment column.

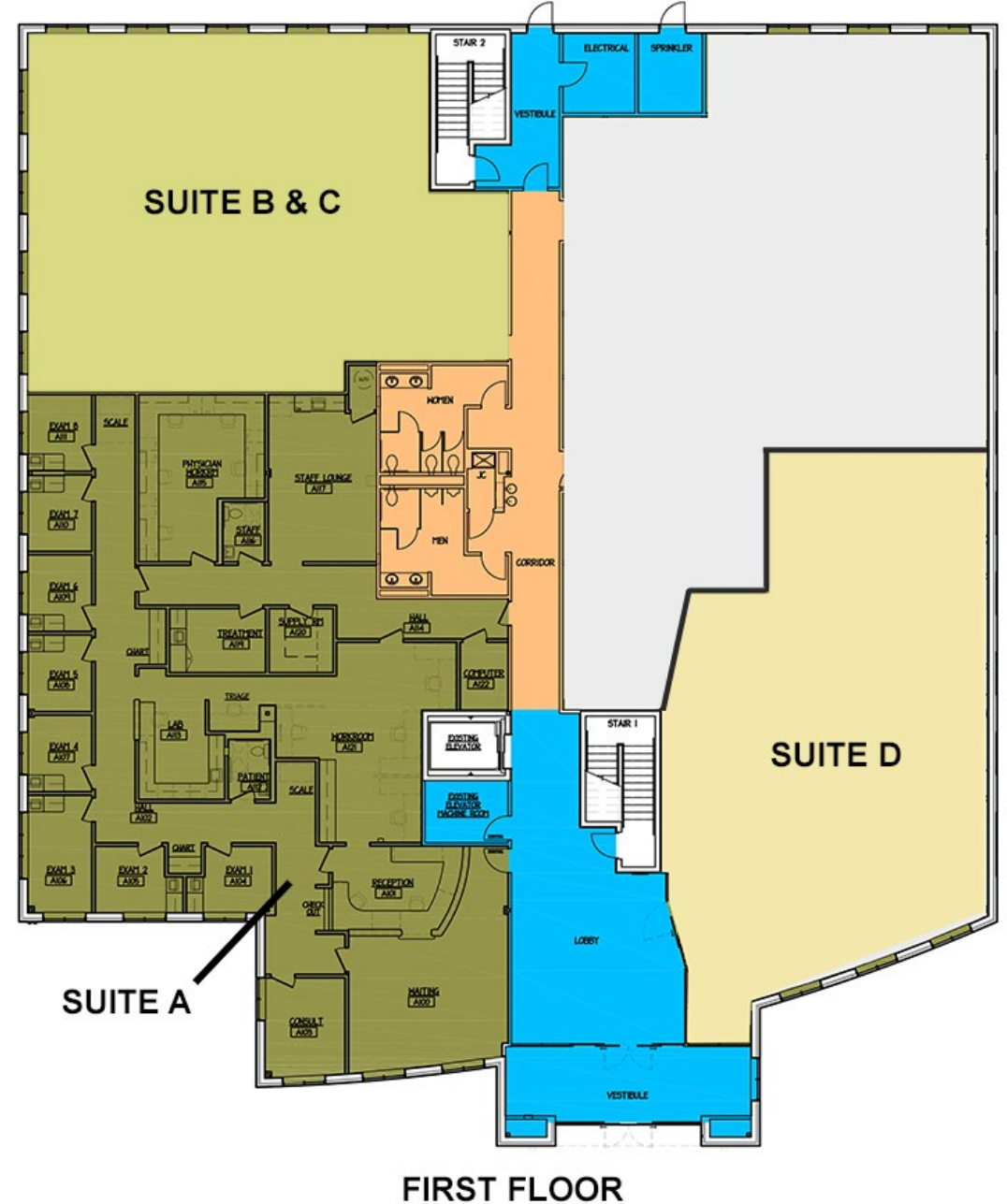
**Table includes:**

- CBC (California Building Code)
- CMC (California Mechanical Code)
- CPC (California Plumbing Code)
- CEC (California Electrical Code)




# Architectural Features California Building Code

## Sections 1226.4 and 1226.6

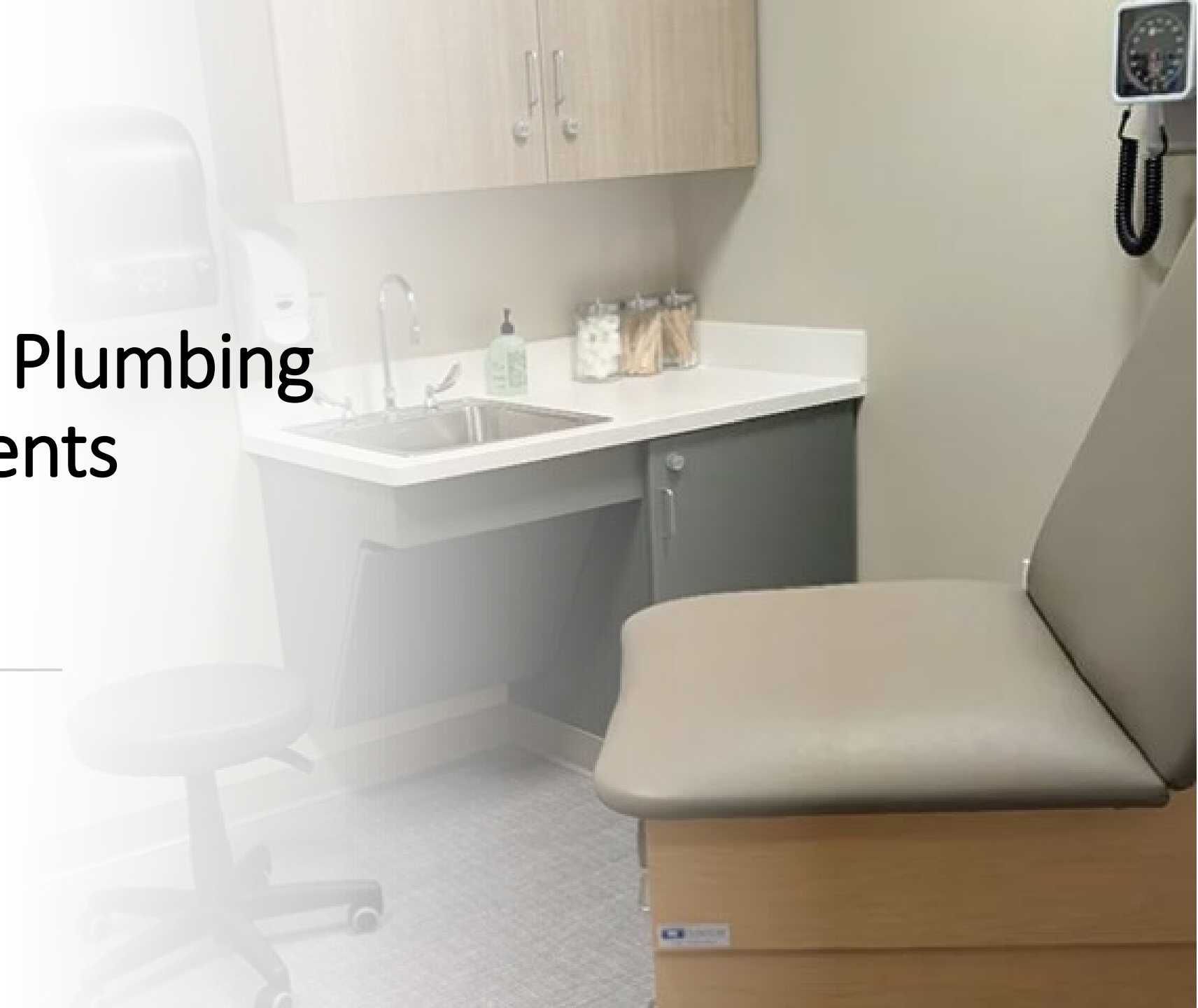






# California Mechanical and Plumbing Code Requirements

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# Mechanical and Plumbing Code Requirements

**Mechanical Code** items in research for 2025 Intervening Code

- Reduced Filtration for lower acuity functions in clinics
- Possible use of plenums for low acuity spaces

**Plumbing Code** items in research for 2025 Intervening Code

- Fixture counts for toilet facilities
- Shared staff toilet for 5 or less staff



# California Electrical Code Requirements

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# Electrical Code Requirements

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

*Standard GFCI protection required*

*Patient care ground fault current path required - metallic raceway and ground wire*

*Lighting intensity shall meet ANSI/IES RP-29 Recommended Practice for Lighting in Hospitals and Healthcare Facilities*

*Mobile medical facilities and X-ray circuiting requirements included. (nothing exceptional)*

*Nurse call systems per Table 1224.4.6.5 shall be required if imaging exam/procedure rooms are present*

# CEC 210.8(B)

## Ground-Fault Circuit-Interrupter Protection for Personnel

**210.8 Ground-Fault Circuit-Interrupter Protection for Personnel.** Ground-fault circuit-interruption for personnel shall be provided as required in 210.8(A) through (C). The ground-fault circuit-interrupter shall be installed in a readily accessible location.

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(B) Other Than Dwelling Units. All 125-volt, single-phase, 15- and 20-ampere receptacles installed in the locations specified in 210.8(B)(1) through (8) shall have ground-fault circuit-interrupter protection for personnel.

(1) Bathrooms

(2) Kitchens

(3) Rooftops

(4) Outdoors

(5) Sinks - where receptacles are installed within 1.8 m (6ft) of the outside edge of the sink.

(6) Indoor wet locations

(7) Locker rooms with associated showering facilities

...

# Part I - General (definitions)\*

**Patient Care Area** - Where patients are intended to be examined or treated.

- ***Category 3 (Basic Care) Space.***

- Typically, where basic medical or dental care, treatment, or examinations are performed. Examples include, but are not limited to, examination or treatment rooms in clinics, medical and dental offices, nursing homes, and limited care facilities
- Space in which failure of equipment or a system is not likely to cause injury to the patients, staff, or visitors but can cause patient discomfort.

- ***Category 2 (General Care) Space.***

- Patient beds, exam rooms, treatment rooms, etc., where patients will come in contact with ordinary appliances.
- Space in which Failure of equipment or a system is likely to cause minor injury to patient, staff, or visitors.

**\*CEC: 517.2**

# Part II - Wiring and Protection

## Grounding requirements of receptacles and fixed equipment in Patient Care Areas

- **Wiring method** – In metal raceway system or cable having metallic armor or sheath assembly that qualifies as an equipment grounding conductor in accordance with 250.118 [517.13(A)]  
-and-
- **Insulated copper grounding conductor** - connected to ground terminals of all receptacles, metal junction boxes and fixed equipment. [517.13(B)]

## ***517.22 [OSHPD 1, 2, 3, 4 & 5] Artificial Lighting.***

***(A) Rooms and Passageways.*** All rooms and passageways shall be provided with artificial illumination.

### ***(B) Illumination.***

***(1) [OSHPD 1, 3, 4 & 5] Illumination intensity.*** Illumination intensity values in each area shall meet the recommended values in the latest edition of ANSI/IES RP-29, Recommended Practice: Lighting Hospital and Healthcare Facilities.

## **Mobile Medical Facilities**

- Requirements in 517.124
- No exceptional requirements

## **Part V - X-Ray Installations:**

- Requirements in 517.70 – 517.78
- No exceptional requirements

# CBC Section 1226 – Table 1224.4.6.5

<b>2022 CBC TABLE 1224.4.6.5</b> <b>LOCATION OF NURSE CALL DEVICES FOR FACILITIES UNDER CBC 1226</b> <b>CLINICS</b>						
X=Required						
Area Designation	Patient Station	Bath Station	Staff Emergency Station	Code Call Station	Nurse Master Station	Duty Station
<b>Support Areas</b>						
Nurse/control station					X	
<b>Diagnostic and Treatment Areas</b>						
Operating room/Cesarean			X	X		
Delivery room/birthing room			X	X		
Pre-op patient care	X		X	X		
Post-op patient care/PACU	X		X	X		
Imaging exam/procedure room			X	X		
Procedure Room, including Endoscopy			X	X		
Patient toilet room		X (1)				

Note 1: not required for Primary Care, Chronic Dialysis, Rehabilitation or Psychology Clinics.





# HOMework: Feedback

**We need feedback June 30.**

Send to: [RegsUnit@hcai.ca.gov](mailto:RegsUnit@hcai.ca.gov)

Use subject line: *PCC public meeting*

PCC meeting materials available:

<https://hcai.ca.gov/facilities/building-safety/pre-cycle-public-meetings/>

# HCAI/OSHDPD TIMELINE

- June 12 – PCC public meeting
- June-August – Prioritize and draft PCC code changes
- August – email draft regulations to interested parties
- August – second PCC public meeting
- June-August – Draft and publish PCC guidance documents
- October – Complete 2025 Intervening code changes
- Dec. 2025 – July 2026 – Formal rulemaking process with CBSC
- July 2027 – New regulations effective

# PCC Guidance Document and Checklist

Update CAN 1-7-2100 Clinics

Separate out different types of clinics

Update the checklists

Available late summer

[OSHDP 3 Clinics Webpage](#)

## OSHDP 3 Clinics

The Department of Health Care Access and Information is responsible for writing regulations pertaining to licensed clinics. These regulations are identified in the California Building Standards Code as “OSHDP 3”. OSHDP 3 requirements for clinics shall only be applied to clinics that are licensed pursuant to Health and Safety Code (H&S) Section 1200 (which includes primary care clinics and specialty clinics) or outpatient services of a hospital licensed pursuant to H&S Section 1250.

The following documents are intended to assist designers, building officials, and clinic operators in applying OSHDP 3 requirements and determining which jurisdiction has authority over the plan review, certification, and construction inspection of clinic facilities.

- [CAN 1-7-2100 Clinics](#)  
(Includes “Plan Review, Approval, Inspection and Certification” flowchart with explanatory notes)
- [Health Facility Checklist – Section 1226.6 Primary Care Clinics](#)
- [Health Facility Checklist – Section 1226.8 Surgical Clinics](#)
- [Health Facility Checklist – Section 1226.9 Chronic Dialysis Clinics](#)

\*Due to the complexity of the data, technical expertise is needed in order to interpret this content. If you have trouble reading please contact [RegsUnit@hcai.ca.gov](mailto:RegsUnit@hcai.ca.gov).

# PCC Guidance Document and Checklist

The **checklist** provides a list of the applicable building code sections.

Compliance Checklist: [OSHPD 3] Primary Care Clinics

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ARCHITECTURAL REQUIREMENTS		PLUMBING/MECHANICAL/ ELECTRICAL REQUIREMENTS
1226.6	<b><u>Primary Care Clinic</u></b> ___ Clinic licensed by CDPH under CH&S Section 1200 or Section 1250	
1226.6.1	<b><u>Examination and treatment areas</u></b>	
1226.6.1.1	<b><u>Examination rooms</u></b>	
1224.4.4.1.1	Space requirements ___ 80 sf min clear floor area, exclusive of ___ Fixed or wall-mounted cabinets, built-in shelves; and ___ Alcoves with a dimension of less than 8', anterooms or vestibules ___ 8' minimum clear dimension, clear of cabinets, etc.	Plumbing*: ___ Handwashing fixture located in exam room, convenient for use by staff entering & leaving room 1224.14.1.6 CPC ___ Wrist/elbow blades are permitted Table 4-2 ___ ABS & PVC drainage piping are 210.0 (1) a, i not permitted 701.1-2(b)
11B-404.2.4	___ *60" maneuvering clearance inside the room, perpendicular to the door ___ *18" min clearance beyond latch side of the door	Mechanical*: ___ Ventilation: Neutral pressure balance at corridor CMC ___ Min 2 air changes/hr OSA Table 4-A ___ Min 6 air changes/hr total ___ (2) Filter banks 30% & 90% Table 4-B
11B-805.4.1	___ *36" wide clear space along at least one side of the exam table	
11B-805.4.3	___ *Clear turning space may be either: ___ 60" diameter circle; or ___ "T" shape within a 60" square w/ arms and base with 36" min width	Other OSHPD 3 requirements ___ Space above a ceiling may not be utilized as an exhaust-air, or CMC return-air plenum 407.4.1.4 ___ Concealed building spaces/ independent construction within buildings may not be used as ducts or plenums ___ Flexible ducts may not exceed 10 CMC
1226.6.1.1	Required fixtures	
1224.4.4.1.1	___ Accommodation for written or electronic documentation ___ Handwashing Station w/ following	

THANK YOU for participating today!

[regsunit@hcai.ca.gov](mailto:regsunit@hcai.ca.gov)