



POLICY INTENT NOTICE

PIN: 72

SUBJECT

Emergency Work Authorization

Effective: 06/15/2022

Revised: 12/02/2025



PURPOSE

Emergency work may be necessary due to permanent equipment failure, natural disaster, or other occurrences that require immediate repair or replacement to ensure jobsite or building occupant health or safety.

The Department of Health Care Access and Information (HCAI), also known as the Office of Statewide Health Planning and Development (OSHPD) and referred to as “Office”, recognizes that emergency temporary construction and installation of temporary equipment is sometimes required to accommodate construction or to provide transitional solutions.

Note that an emergency is not maintenance to prevent something from failing. A true emergency is the actual disaster, event, or failure of equipment.

BACKGROUND

Most work in a hospital requires a permit. This includes construction as well as replacement of equipment. HCAI recognizes there are situations where an emergency exists that corrections must be made quickly in order to keep the hospital functioning and occupants safe. Emergency authorizations have been around since the early days of this requirement but there has been inconsistency in what was required and how it was implemented. This Policy Intent Notice (PIN) will standardize expectations so that requirements are known prior to an emergency.

APPLICABLE CODE SECTIONS

**2025 California Administrative Code, California Code of Regulations, Title 24, Part 1
 CHAPTER 7, SAFETY STANDARDS FOR HEALTH FACILITIES
 ARTICLE 2, DEFINITIONS**

EMERGENCY REPAIR [OSHPD 1, 2, 3, & 5] Repair to, or replacement of, an element of a building, structure, utility system, or equipment that is essential to the continued safe occupation and operation of a facility. May include repairs needed after a disaster.

MAINTENANCE [OSHPD 1, 2, 3, & 5] The routinely recurring work required to keep a facility (plant, building, structure, utility system, etc.) in such condition that it may be continuously utilized, at its original or designed capacity and efficiency, for its intended purpose. Actions necessary for retaining or restoring an existing element or component of a building, piece of equipment, machine, or system to the specified operable condition to achieve its maximum useful life, including corrective

maintenance and preventative maintenance. (See also HCAI [“A Guide for Field Review FR Projects, Excluded \(E\) from OSHPD Plan Review, and Expedited Review \(ER\) FREER MANUAL](#), Section X:(f): Maintenance Criteria).

**2025 California Administrative Code, California Code of Regulations, Title 24, Part 1
CHAPTER 7, SAFETY STANDARDS FOR HEALTH FACILITIES
ARTICLE 20, REPAIR OF DAMAGE AFTER AN EMERGENCY**

7-300. Plan review and approval.

- (a) All repair projects are subject to prior plan review, plan approval and construction permit by the Office except as noted in subsection (b).
- (b) For emergency repairs carried out without the Office plan review and permit in the aftermath of an emergency, an application for plan review must be submitted with construction documents, fees and a letter of transmittal stating the reasons for emergency repairs within 10 business days of the temporary authorization. Back checks shall be resubmitted within 10 business days of receiving comments. Photographs, if available, and reports of damage and repairs should also be submitted with the application. Additional repairs may be required if the emergency repairs do not comply with the code. For alternate fee payment methodology, see Section 129787 of the Health and Safety Code.

**2025 California Building Code, California Code of Regulations, Title 24, Part 2, Volume 1
DIVISION II – SCOPE AND ADMINISTRATION
PART 2—ADMINISTRATION AND ENFORCEMENT
SECTION 105—PERMITS**

[A] 105.2 Work exempt from permits. ...

[A] 105.2.1 Emergency repairs. Where equipment replacements and repairs must be performed in an emergency situation, the permit application shall be submitted within the next working business day to the building official.

**2025 California Building Code, California Code of Regulations, Title 24, Part 2, Volume 1
CHAPTER 2, DEFINITIONS, SECTION—202 DEFINITIONS**

EQUIPMENT. *[DSA-SS, DSA-SS/CC, OSHPD 1, 2, 4 & 5] Equipment as used in this part and all applicable parts of the California Building Standards Code shall be classified as fixed equipment, mobile, movable, countertop, interim, temporary or other equipment.*

INTERIM EQUIPMENT *[OSHPD 1, 2, 4 & 5] means equipment that will be in use for the duration of the need for equipment, not to exceed the duration of the construction project that it is related to.*

TEMPORARY EQUIPMENT *[OSHPD 1, 2, 4 & 5] means fixed, movable, countertop or other equipment that is used during replacement, maintenance or repair for a time of services as defined in Section 108. (also see HCAI Code Application Notice (CAN) CAN 2-108)*

POLICY

HCAI will consider and may issue an Emergency Authorization to Proceed (EAP) with emergency repair work prior to plan approval and building permit based on emergency conditions and necessity.

Even where an EAP is granted, the design for permanently repairing or replacing building systems, components, or equipment must be eventually approved and permitted as required by California Administrative Code, Chapter 7, Article 3, APPROVAL OF CONSTRUCTION DOCUMENTS.

All emergency repair projects must adhere to the general emergency authorization requirements noted herein for permanent equipment and building components or temporary equipment and building components. Temporary equipment or temporary building components may have special requirements.

PROCEDURE

Where an emergency situation arises, the facility shall take the following actions:

I. Immediate Action

The facility may take the necessary emergency actions to abate and make safe the emergency condition that poses an imminent danger to life, injury, or property damage. Such emergency actions may proceed prior to contacting HCAI, and the Regional Compliance Officer (RCO) must be contacted immediately thereafter.

For existing approved projects, the facility and/or their contractor, may take the necessary actions to abate and make safe the emergency conditions arising at a project or construction site that poses an imminent danger to life, injury, or property damage.

Such emergency actions may proceed prior to contacting HCAI, and all changes to active permitted projects shall be documented by a subsequent Amended Construction Document (ACD) with Inspector of Record (IOR) inspections documenting all emergency work performed. The IOR shall apply reasonable diligence to maintain the normally required on-site documentation including material tests and special inspection reports.

Beyond emergency actions to abate the emergency conditions and to make safe the emergency conditions, emergency repairs, restoration, or replacement of an element of the building, structure, utility system, or equipment shall be authorized by the Office prior to proceeding with work.

The review of the emergency repair work requires a new project. The first step is to apply for a new project through the online application portal, eCA. Select "Yes" on the "Project Includes Emergency Work" field on the Emergency Work page. When the application is submitted, a project is created with a prefix of "E" in the project number. Note this is required as the RCO is unable to process the EAP until the "E" Project Number is obtained by the applicant.

A separate "H" or "S" project may be required to be submitted to the Office for the permanent replacement of equipment, or other work required to permanently repair or mitigate the emergency

II. Notification to HCAI and Request for EAP

Immediate e-mail notification shall be provided to the RCO regarding the emergency condition. An additional e-mail notification shall be sent to the RCO with the "E" Project Number which will allow the RCO to review, make the determination, and issue the EAP results letter.

For all emergency repair work projects, the Permit Application and complete [Testing Inspection Observation \(TIO\)](#) Program shall be submitted within the next working business day as required per California Building Code, Part 2, Volume 1, Section [A] 105.2.1 Emergency repairs.

It is the facility's responsibility to notify the California Department of Public Health (CDPH) Licensing and Certification of the emergency condition and affects to the facility's operations and the facility's request to HCAI to approve the emergency repair, replacement, or temporary equipment project.

Because each emergency condition is unique, the RCO will review each EAP request on an individual basis and decide if it can be granted.

III. When an EAP is Denied, Construction May Not Proceed Until Plan Approval and Building Permit has been Issued by HCAI

If the RCO determines the request does not meet the requirements for EAP, the request will be denied. If the approval for emergency authorization is denied, the "E" project created will be cancelled and a new "H" or "S" project will be required to be created and will proceed as a traditional submittal and construction work may not proceed until written plan approval and the issuance of a building permit.

Emergency repair does not include the ongoing replacement, upgrading of equipment, or corrective/preventive maintenance.

Replacement of equipment that is not critical to the safety of occupants or continued operations of facility will not be approved as an emergency replacement. An example is replacement of failed imaging equipment; this is not an emergency unless the imaging equipment is a required basic service.

IV. When an EAP is Approved, Construction May Commence Prior to Plan Approval and the issuance of a Building Permit in accordance with the Requirements and Conditions of the Emergency Authorization Approval

An Emergency Authorization to Proceed Approval Letter will be issued by the RCO for the specific work that may be performed with conditions and restrictions noted. Emergency authorization is not an expedited review and start of construction should begin as soon as authorization to proceed is granted.

An Emergency Authorization Banner will be applied to the project in Office's project logging software (eSevicesPortal or eSP) to indicate the issuance of the EAP.

The following apply to each Emergency Project:

A. The Design Professional(s) of Record (DPOR(s)) shall provide all necessary direction to perform the work of construction and inspection of the work in the form of plans, notes, sketches, installation instructions and/or drawings, TIO program, etc., to the Contractor and the IOR. This direction is required to allow the work to proceed while preparing the required construction documents and prior to the Office's plan approval.

B. The emergency project plan submittal and building permit must be carried out in an expeditious manner to ensure that the emergency work conforms with the California Building Standards Code requirements.

Complete construction plans for emergency repair work, including what was or will be done to abate the emergency must be submitted to the Office within 10 days of the Emergency Authorization to Proceed Approval Letter issued by the RCO. Extension requests of up to 10 days may be submitted to the RCO with justifiable cause.

For emergency projects, all returns and backcheck submittals shall be resubmitted within 10 days of the Office return date.

C. The construction work on the emergency project must be carried out to completion without undue delay. Notification to the Office must be provided when construction actually begins with the IOR notifying field staff of the start of work.

D. If the plan approval and/or permit is delayed without justifiable cause or valid reasons, an Unauthorized Construction Project may be applied in accordance with California Administrative Code (CAC), Section 7-128 Work performed without a permit. The Building Permit Application is required to be submitted within 10 days from the issuance of written plan approval per CAC 7-300.

E. The DPOR is responsible for submitting the TIO with the plans submittal and maintaining the TIO with all required testing and inspection for field approval during performance of emergency work.

If special testing and/or special inspections are required, the DPOR shall submit the TIO to the project Field Staff for review and approval prior to work being performed.

The accepted TIO shall be distributed to the contractor and IOR with all required test and/or special inspection to be performed listed.

F. Inspection of the Work: All emergency authorized work must be continuously inspected by an IOR approved by the Office. The IOR will continuously inspect the work during its placement to verify that the work performed prior to plan approval complies with the California Building Standards Code and the final HCAI OSHPD approved construction documents. The IOR shall notify the Regional Compliance Officer and the Compliance Officer (CO) in writing when work is started as required by the California Administrative Code, Section 7-145(a)5 Continuous inspection of the work. The required IOR Start Notice shall be uploaded at the start of construction to the assigned project number documents in the eServicesPortal. The IOR shall coordinate required field observation with all necessary Field Staff.

The IOR shall submit their daily field records of construction progress for this *Emergency Authorization* for each day or any portion of a day that they are present at the project site location to the Compliance Officer, Fire Life Safety Officer (FLSO), and Regional Compliance Officer. Submission of the daily field report shall be without delay and may be via email or uploaded to the project record using the eServicesPortal. Submission of IOR daily field records of construction progress shall be received by Field Staff or uploaded to eSP within one day of the field inspection date. The daily field record shall state the time of arrival, time of departure, a summary of work in progress and noted deficiencies in the construction. The daily field record shall document the date, time, and method of correction for any noted deficiencies or deviations (California Administrative Code, Section 7-145 Continuous inspection of the work.). No work shall be covered, concealed, or placed into service without authorization by the Office. Failure of the IOR to provide the IOR Field Records within one day of the field inspection date may result in the IOR not being approved/considered for future EAP projects.

- G. Substantial Compliance (SC): An SC Milestone must be added on the TIO for any work, equipment, or area that will be placed into temporary or permanent use or service. All applicable listed professionals shall submit a Verified Compliance Report ([VCR](#)) for the SC Milestone for HCAI review and approval of the SC.

Conditional Substantial Compliance (CSC) may be granted prior to plan approval or submittal of complete plans for plan review. Preliminary plans and other documents may be required to be submitted for preliminary review prior to issuance of a CSC.

- H. Additional repairs or corrections may be required if the authorized emergency work does not comply with the conditional approval and the final HCAI OSHPD approved construction documents.
- I. EAP projects are not eligible for extensions of time as set forth in CAC, Section 7-129 Time limitations.

V. Special Conditions and Exceptions for Emergency Projects involving Permanent Equipment and/or Building Components

The RCO in consultation with the Field Staff may classify the emergency repair work as maintenance based on the scope of construction work and exempt the emergency project from plan approval and building permit. Projects exempted under maintenance will be closed by the RCO under an administrative closure.

VI. Special Conditions and Exceptions for Emergency Projects involving Temporary Equipment and/or Building Components

Temporary equipment and systems may be required to protect occupant safety and maintain services during the repairs. Temporary equipment installed under an emergency authorization must comply with the requirements of CAN 2-108. The time duration of use is measured from the date the equipment is first placed into service until removal from site.

The additional structural load of any equipment that is placed or mounted on the structure must be verified that it can be supported by the structure.

POLICY INTENT NOTICE (PIN)

The additional electrical or mechanical load of any equipment that is placed on existing service must be verified that the existing system can support the added load. Special consideration must be given to additional electrical load on the emergency electrical branch. (Refer to CAN 2-108).

All emergency temporary equipment is required to be removed prior to project closure.

The RCO may, at their discretion, exempt the submittal of plans for temporary equipment in place less than 30 days. The 30 days start when the equipment is in service and ends when disconnected and removed from the site. If temporary equipment is left in place longer than 30 days, a permit or ACD must be submitted to show this equipment as either temporary (less than 180 days), interim, or permanent.

Emergency projects exempted from plan approval may be closed under typical closure requirements or may be closed administratively as determined on a case-by-case basis of each project.

If temporary conditions approved under an Emergency Authorization to Proceed are not addressed per the California Building Standards Code and this PIN, an Investigative (INV) record will be created for Unauthorized Construction, and the facility will have restrictions placed for future construction projects until it comes into compliance.

Original signed _____ 12/02/2025
Chris Tokas, Deputy Director Date

REVISION HISTORY

12-02-2025	First Revised
	Clarification that the Emergency Work Authorization Project is to address the emergency measures taken to abate the emergency.
	Reference to permanent fixes have been removed.
	Minor editorial corrections.
06-15-2022	First Issued