



SUBJECT

Treatment and Class 1 Imaging

PIN: 73

Effective: 8/03/2022



PURPOSE

Exam Rooms and Operating Rooms have been defined in the California Building Code (CBC) since the 2010 edition. Procedure Rooms and Class 1, 2 and 3 Imaging Rooms were added to the 2022 CBC. 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”, does not make the decision on the types of procedures to be performed in each of these rooms. The California Department of Public Health (CDPH) makes that determination. HCAI does require a Functional Program listing the procedures to be performed in those rooms to be submitted with the project and accepted by CDPH.

Table 1224.4.11.4a, identifying the use, room type, location and finish surfaces for these rooms was included in the 2022 CBC. At a point after the California Building Standards Commission (BSC) approved the proposed language, the Use defined in the new table was reevaluated and found to be too restrictive for Treatment Rooms and Class I Imaging Rooms. The purpose of this PIN is to clarify the Use of these rooms.

BACKGROUND

HCAI had initially worked with CDPH to identify the Uses for the Exam/Treatment and Class I Imaging Room to be “services that use natural orifice entry and do not pierce or penetrate natural protective membranes” as defined in the Facilities Guidelines Institute (FGI) *Guidelines for Design and Construction of Hospitals* as the national standard. After approval of the code language revisions, it was noted that this language was more restrictive than current medical practices allowed. After continued meetings with CPDH it was decided to revise this language to be aligned with current practice.

While exam rooms are generally diagnostic in nature, treatment rooms *may be used for a variety of functions, including patient examinations, wound packing, suture placement, or casting* [2018 FGI Glossary]. The common summary “a room designated for the performance of patient care activities that may require high-level disinfected or sterile instruments but do not require the environmental controls of a procedure room” is used in Table 1224.4.11.4a and was actually intended to apply to Class 1 imaging rooms as well. Class 2 imaging rooms would then be equivalent to procedure rooms “designated for the performance of patient care that requires high-level disinfection or sterile instruments and some environmental controls but not required to be performed with the environmental controls of an operating room.”

APPLICABLE CODE SECTIONS

From the **California Building Code, California Code of Regulations, Title 24, Part 2 Chapter 2, DEFINITIONS:**

INVASIVE PROCEDURE. *means a procedure that is performed in an aseptic surgical field and penetrates the protective surfaces of a patient's body (e.g., subcutaneous tissue, mucous membranes, cornea). An invasive procedure may fall into one or more of the following categories:*

- *Requires entry into or opening of a sterile body cavity (i.e., cranium, chest, abdomen, pelvis, joint spaces)*
- *Involves insertion of an indwelling foreign body*
- *Includes excision and grafting of burns that cover more than 20 percent of total body area*
- *Does not begin as an open procedure but has a recognized measurable risk of requiring conversion to an open procedure*

PROCEDURE ROOM. *means a room designated for the performance of patient care that requires high-level disinfection or sterile instruments and some environmental controls but is not required to be performed with the environmental controls of an operating room.*

RESTRICTED AREA. *Applies to a designated space contained within the semi-restricted area and accessible only through a semi-restricted area. The restricted area includes operating and other rooms in which operative or other invasive procedures are performed. Such space has one or more of the following attributes: specific signage, physical barriers, security controls and protocols that delineate requirements for monitoring, maintenance, attire, and use.*

SEMI-RESTRICTED AREA. *Applies to peripheral areas that support surgical services or intermediate level procedures or imaging. These areas may include storage for equipment and clean and sterile supplies; work area for processing instruments; sterile processing facilities; hand scrub stations; corridors leading from the unrestricted area to the restricted area of the surgical suite; and entrances to staff changing areas; pre- and postoperative patient care areas, and sterile processing facilities. The semi—restricted area of the surgical suite is entered directly from the unrestricted area past a nurse station or from other areas. Public access is controlled.*

UNRESTRICTED AREA. *Applies to any area of the surgery or medical department that is not defined as semi-restricted or restricted. These areas may include a central control point for designated personnel to monitor the entrance of patients, personnel, and materials into the semi-restricted areas; staff changing areas; a staff lounge; offices; waiting rooms or area; pre- and postoperative patient care areas; or access to procedure rooms. Public access may be limited.*

California Building Code, Part 2, Volume 1, Section 1224.4:

1224.4.11 Interior finishes. *For imaging, examination/treatment, procedure and operating rooms, also see Table 1224.4.11.4a.*

From Table 1224.4.11.4a Examination/treatment, imaging, procedure and operating room classification:

Class 1 imaging room: Diagnostic radiology, fluoroscopy, mammography, computed tomography (CT), ultrasound, magnetic resonance imaging (MRI) and other imaging modalities. Services that use natural orifice entry and do not pierce or penetrate natural protective membranes

California Building Code, Part 2, Volume 1, Section 1224.18:

1224.18 RADIOLOGICAL/DIAGNOSTIC IMAGING SERVICE SPACE. *Space and equipment shall be provided to accommodate all required elements, and any additional imaging modalities included in the service space, as required in this section. To differentiate the design and construction requirements needed to achieve the environmental controls and other requirements that support the amount of intervention to be provided, imaging rooms shall be classified as described in Table 1224.4.11.4a (Examination/Treatment, Imaging, Procedure, and Operating Room Classification). Where an imaging room will be used for Class 1 and Class 2 procedures, the more stringent requirements for the higher class room shall apply. Where imaging procedures meeting Class 3 criteria are performed, rooms that meet the requirements for the applicable imaging suite and for an operating room per Section 1224.15.2.1 or hybrid operating room per Section 1224.28.5 shall be provided. If Class 3 interventional or image-guided procedures are performed in the imaging services area, additional provisions shall be as described in Section 1224.28 Supplemental Surgery and other Special Procedure Services. If nuclear medicine is provided in the imaging services area, spaces shall also comply with the requirements described in Section 1224.34 Nuclear Medicine.*

POLICY

Exam rooms, treatment rooms and Class 1 imaging rooms are equated in Table 1224.4.11.4a as unrestricted spaces that may be accessed from unrestricted spaces. They do not require the environmental controls of a procedure room.

HCAI will follow the guidance of CDPH when interpreting the uses for a Class 1 imaging room as follows: Diagnostic radiology, fluoroscopy, mammography, computed tomography (CT), ultrasound, magnetic resonance imaging (MRI), and other imaging modalities. Services that either:

- a) use natural orifice entry and do not pierce or penetrate natural protective membranes or
- b) are low-risk needle-based procedures that do not require a sterile field.

Procedure rooms and Class 2 imaging rooms are semi-restricted spaces that may be accessed from either unrestricted or semi-restricted spaces. They require some environmental controls but are not required to be performed with the environmental controls of an operating room.

Operating rooms and Class 3 imaging rooms are restricted spaces that must be accessed only from semi-restricted spaces. The environmental controls are specific to the procedures intended and finish requirements are more restrictive than in procedure rooms and Class 2 imaging rooms.

All imaging projects will be submitted to CDPH during plan review for their concurrence on the proposed procedures for the procedure or imaging rooms within the project. It is not HCAI's

POLICY INTENT NOTICE (PIN)

position to make a determination on the appropriateness of any procedures but only to ensure that the room complies with the California Building Standards Codes requirements.

<u>Original signed</u>	<u>8/03/2022</u>
Chris Tokas	Date