

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 24, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 8, 2012

Date: 5 October 2012

From:

Carol Corr
(RB) Name (Print or type)


(Signature)

KAISER PERMANENTE

Agency, jurisdiction, chapter, company, association, individual, etc.

1800 Harrison Street Oakland CA 94612
Street City State Zip

I/We (do)(do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1224.4.4.2.1 sub item 1.

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

Suggested Revisions to the Text of the Regulations:

1224.4.4.2 Specimen and blood collection facilities.

1224.4.4.2.1 Specimen collection facilities. *When provided, specimen collection facilities shall comply with the following requirements:*

1. *Urine collection rooms shall be equipped with a water closet and handwashing station.*

Exception: the handwash station may be located immediately outside the collection room when the specimen is used for drug testing.

Reason:

For drug testing, urine collection must either be observed, or conducted in a room that does not allow the specimen to be diluted or otherwise contaminated. Allowing the proposed exception above avoids unnecessary cost for building collection toilets to accommodate direct observation, and mandating operational costs for observation, in situations where it wouldn't be strictly necessary. Although drug testing is an unusual function in most hospital services, this section must be modified because similar provisions in section 1226 (e.g. Primary Care Clinics, 1226.6.3.2) reference it.