



CORPORATE OFFICE
200 South Wells Road, #200
P.O. Box 4669
Ventura, CA 93007

tel (805) 659-1740
fax (805) 659-9959
www.clinicas.org

VENTURA
200 South Wells Road, #100
Ventura, CA 93004
tel (805) 647-6322
fax (805) 647-7164

OXNARD
650 Meta Street
Oxnard, CA 93030
tel (805) 487-5351
fax (805) 487-2599

FILLMORE
355 Central Avenue
Fillmore, CA 93015
tel (805) 524-4926
fax (805) 524-4137

OJAI
1200 Maricopa Highway
Ojai, CA 93023
tel (805) 640-8293
fax (805) 640-1410

SANTA PAULA
500 East Main Street
Santa Paula, CA 93060
tel (805) 933-0895
fax (805) 933-3836

MARAVILLA
450 West Clara Street
Oxnard, CA 93033
tel (805) 488-0210
fax (805) 488-0510

OCEAN VIEW
4400 Olds Road
Oxnard, CA 93033
tel (805) 986-5551
fax (805) 986-5556

NORTH OXNARD
1200 N. Ventura Road, #E
Oxnard, CA 93030
tel (805) 988-0053
fax (805) 988-0554

PEDIATRICS
1300 N. Ventura Road, #5
Oxnard, CA 93030
tel (805) 988-1225
fax (805) 278-7186

WOMEN'S HEALTH CENTER
1300 N. Ventura Road, #6
Oxnard, CA 93030
tel (805) 988-1180
fax (805) 485-6828

NEWBURY PARK
1000 Newbury Road, #150
Newbury Park, CA 91320
tel (805) 498-3640
fax (805) 498-3641

EL RIO
221 Ventura Blvd., #126
Oxnard, CA 93036
tel (805) 436-3444
fax (805) 485-4160

MOORPARK
4279 Tierra Rejada Road
Moorpark, CA 93021
tel (805) 222-2323
fax (805) 222-2333

SIMI VALLEY - MADERA
1424 Madera Road
Simi Valley, CA 93065
tel (805) 522-5722
fax (805) 915-4141

November 4, 2013

State of California
State and Consumer Services Agency
California Building Standards Commission
2525 Natomas Park Dr., Suite 130
Sacramento, CA 95833
Email: cbssc@dgs.ca.gov

Re: Agenda Items 5, 7, and 8- REJECT THIS PROPOSAL

Dear Madam Chair and Members of the Commission,

On behalf of Clinicas del Camino Real, Inc. serving 75,000 women, men and families we are writing to alert you to our grave concerns with the revised OSHPD proposal to eliminate the OSHPD 3SE plumbing standards that were adopted in April by the Building Standards Commission. We are requesting the Commission reject this proposal.

Our association and membership participated in months of stakeholder meetings and worked with OSHPD staff to develop a new category of plumbing requirements for licensed community clinics that reflect the need for differing construction standards for hospitals versus community clinics and health centers (CCHCs).

We were deeply disappointed and surprised to learn that as a result of a lawsuit these codified common sense buildings standards are at risk. The commission met in April, applied the criteria set forth by your mandate and ruled that these standards are appropriate. This decision should be allowed to stand.

Private physician offices and county clinics currently operate outside of the hospital-based construction requirements without any documented risk to public health and safety or environmental protections.

On average, CCHCs operate on a 2 to 3 percent financial margin. The financial impact on CCHCs, if they are forced to adhere to the previous plumbing standards, will range from \$50,000 to upwards of \$250,000 for new construction and/or renovations that do not improve the quality of care to our patients and that other similarly situated providers are not subject to. These costly and unnecessary changes effectively result in barriers to access for patient care because we are required to utilize our funds for unnecessary construction costs rather than opening additional sites in underserved areas.

We applaud the leadership of Governor Jerry Brown to prioritize streamlining overly burdensome regulations. OSHPD 3SE plumbing standards are the perfect response to Governor Brown's commitment to reducing unnecessary regulatory burdens on Californians. Equally important, we applaud the Governor's commitment to the Affordable Care Act to meet the needs of California to provide quality medical care to the millions of uninsured Californians and addressing the basic health care needs of the thousands of Californians who have lost jobs or cannot afford insurance coverage.

From their inception in the 1960s, CCHCs have worked to provide high quality medical and behavioral health services, reduce health disparities, improve patient safety, coordinate care; and ultimately through this work have improved population health. CCHCs have become the medical home for the majority of low-income, uninsured and medically underserved individuals in California. Our health center is a non-profit corporation and provides services to patients regardless of their ability to pay.

At a time when we collectively stand ready to serve millions of new patients in just a few short months, these onerous regulations will significantly impede our ability to meet the needs of California uninsured and underinsured communities.

The commission met in April, applied the criteria set forth by your mandate and ruled that these standards are appropriate. This decision should be allowed to stand. We therefore respectfully urge the Building Standards Commission to reject this proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Christina M. Velasco', with a long horizontal flourish extending to the right.

Christina M. Velasco
Chief Financial Officer