

CLEARANCES AT EXAMINATION, DIAGNOSTIC, AND TREATMENT ROOMS

BIN 6

Author:	Bill Zellmer AIA, CASp	Issue Date:	November 7, 2014	Sutter Health - Physical Access Compliance		
	Sutter PAC Group	Revisions:	March 3, 2022	Barrier Interpretation Notice (BIN)		
Topic No.	Topic Name	Brief Description	2019 CBC - Code Text:	2010 ADA Standards - Text:	Sutter Guidance	Additional Information
1	General	The 2019 CBC has specific clearances required at Examination, Diagnostic and Treatment Rooms.	CBC Section 11B-805.4 Examination, diagnostic and treatment rooms. 11B-805.4.1 Beds, exam tables, procedure tables, gurneys and lounge chairs. A 36" minimum wide clear space shall be provided along the full length of each side of beds, exam tables, procedure tables, gurneys and lounge chairs. Exception: General exam rooms in a non-emergency setting may provide clear space on only one side of beds, gurneys, and exam tables.	N/A The 2019 CBC requirements for this item match, or are more restrictive than the 2010 ADA Standards for this item.	These requirements must be incorporated into all new Sutter construction work that is governed by the 2019 CBC.	See Detail Page 6.1
2	Application	It is understood that these requirements are applicable at hospitals and skilled nursing facilities under HCAI / OSHPD jurisdiction, however, due to the text of 11B-223.4, these requirements are also applicable at clinics and medical office buildings.	CBC Section 11B-223 Medical care and long-term care facilities 11B-223.4 Professional offices of health care providers. Professional offices of health care providers shall comply with Section 11B-805.	N/A The 2019 CBC requirements for this item match, or are more restrictive than the 2010 ADA Standards for this item.	Sutter will require compliance with the clearance requirements of 11B-805.4 in Sutter Hospitals, skilled nursing facilities, clinics and medical office buildings.	See Detail Page 6.2
3	Exam Rooms	At most exam rooms, a 36" aisle is required along the full length of <u>one side</u> of the exam table. However, in some situations, there is a requirement for a 36" aisle on <u>both</u> sides of an exam room table.	CBC Section 11B-805.4.1 Beds, exam tables, procedure tables, gurneys and lounge chairs. A 36" minimum wide clear space shall be provided along the full length of each side of beds, exam tables, procedure tables, gurneys and lounge chairs. Exception: General exam rooms in a non-emergency setting may provide clear space on only one side of beds, gurneys, and exam tables.	N/A The 2019 CBC requirements for this item match, or are more restrictive than the 2010 ADA Standards for this item.	1. Exam Rooms: There must be a 36" clear aisle along the full length of <u>one-side and Foot</u> of exam room tables except as noted in items 2 and 3 below. 2. Exam Rooms in an Emergency Setting: There must be a 36" clear aisle on <u>both sides and Foot</u> of exam tables in exam rooms in an 'Emergency Setting'. 3. Specialty Exam Rooms: There must be a 36" clear aisle on <u>both sides and Foot</u> of exam tables in 'Specialty' exam rooms.	See Detail Page 6.3

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Topic No.	Topic Name	Brief Description	2019 CBC - Code Text:	2010 ADA Standards - Text:	Sutter Guidance	Additional Information
4	Procedure Tables, Gurneys, and Lounge Chairs	At all procedure tables, gurneys and lounge chairs, the code requires a 36" aisle along the full length of <u>both sides</u> of the procedure table, gurney or lounge chair.	CBC Section 11B-805.4.1 Beds, exam tables, procedure tables, gurneys and lounge chairs. A 36" minimum wide <u>clear space</u> shall be provided along the full length of each side of beds, exam tables, procedure tables, gurneys and lounge chairs. (emphasis added)	None.	A 36" clear aisle is required along the full length of <u>both sides and Foot</u> of procedure tables, gurneys and lounge chairs. (See topic 3 of this BIN for Exam Rooms)	See Detail Page 6.4
5	Furniture and Equipment	The requirements call for 'clear space' but do not specifically address furniture and equipment.	CBC Section 11B-805.4.1 Beds, exam tables, procedure tables, gurneys and lounge chairs. A 36" minimum wide <u>clear space</u> shall be provided along the full length of each side of beds, exam tables, procedure tables, gurneys and lounge chairs. (emphasis added)	None.	Sutter Preference: All furniture and equipment shall have a ' <u>Home Base</u> ' location that is not within the required clear space.	See Detail Page 6.5
6	Wall-mounted objects	This section of code does not address the disposition of wall-mounted objects that hang over the required clear space.	CBC Section 11B-805.4.1 Beds, exam tables, procedure tables, gurneys and lounge chairs. A 36" minimum wide <u>clear space</u> shall be provided along the full length of each side of beds, exam tables, procedure tables, gurneys and lounge chairs. (emphasis added)	None.	Sutter Preference: Objects may be mounted on the wall and protrude up to <u>4" into/over</u> the clear space required at beds, exam tables, procedure tables, gurneys and lounge chairs.	See Detail Page 6.6

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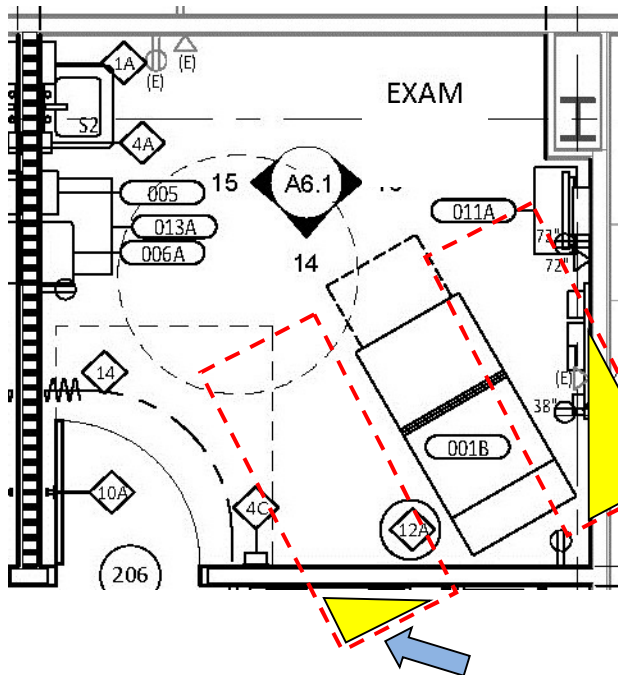
6.1 – Hospitals, Clinics, MOB's

A. Code Text: 11B-805.4 Examination, diagnostic and treatment rooms.

11B-805.4.1 Beds, exam tables, procedure tables, gurneys and lounge chairs. A 36" minimum wide clear space shall be provided along the full length of each side of beds, exam tables, procedure tables, gurneys and lounge chairs.

Exception: General exam rooms in a non-emergency setting may provide clear space on only one side of beds, gurneys, and exam tables.

B. This building code requirement significantly changes the traditional layout for examination and treatment rooms, which frequently locate the head of the exam/treatment table near the corner of the room at an angle. The corner- arrangement may not satisfy the new requirements for a 36" aisle along the **'Full Length'** of the bed or table.

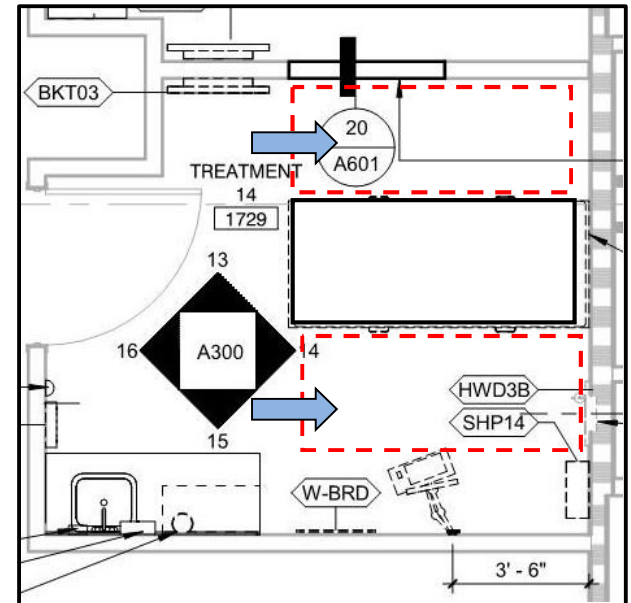


Corner Arrangement:

Triangular portions of the required 36" clear space are obstructed by the side walls.

Orthogonal Arrangement:

The entire required 36" clear space is available on both sides of the procedure table.



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6.2 – Hospitals, Clinics, MOB’s

- A. It is understood that the requirements of 11B-805 are applicable to projects under HCAI / OSHPD jurisdiction (hospitals and skilled nursing facilities)
- B. A few years ago there was some controversy regarding the application of these requirements to clinics and medical office buildings which are not under the jurisdiction of HCAI / OSHPD, but rather are under the jurisdiction of the local Authority Having Jurisdiction (AHJ) (most frequently City and County building departments). In some cases, the local AHJ may not be aware of these requirements or may not believe them to be applicable to projects under their jurisdiction.
- C. Sutter has consulted directly with HCAI / OSHPD on multiple occasions and has confirmed that in the opinion of HCAI / OSHPD these requirements do apply to clinics and medical office buildings, and will render this same opinion to any AHJ (or others) who may ask.
- D. Sutter has also consulted directly with DSA on multiple occasions and has confirmed that in the opinion of DSA, Code Section 11B-223.4 does apply to medical office buildings and does indeed require compliance with 11B-805.
- E. The heading of the CBC ‘Scoping’ section 11B-223 supports this position. 11B-223 is titled “**Medical care and long-term care facilities**”.
- The 2019 CBC defines ‘**Medical Care**’ as: “Care involving medical or surgical procedures, nursing or for psychiatric purposes.” Sutter has concluded that it would be difficult to argue that Sutter’s clinics and medical office buildings are not ‘Medical Care’ facilities.
- F. The text of 11B-223.4 further supports this position. “**11B-223.4 Professional offices of health care providers.** Professional offices of health care providers shall comply with Section 11B-805.”
- Again, it would be difficult for Sutter to claim that our clinics and medical office buildings do not constitute the ‘Professional offices of health care providers’.
- G. It should be noted that the authority for writing accessibility-related code sections belongs to the Division of the State Architect (DSA), who allowed HCAI / OSHPD to submit 11B-805 under DSA authority and under DSA oversight. Therefore, technically, DSA was responsible for submitting these new code changes (originally submitted for the 2013 CBC code cycle at the request of HCAI / OSHPD.

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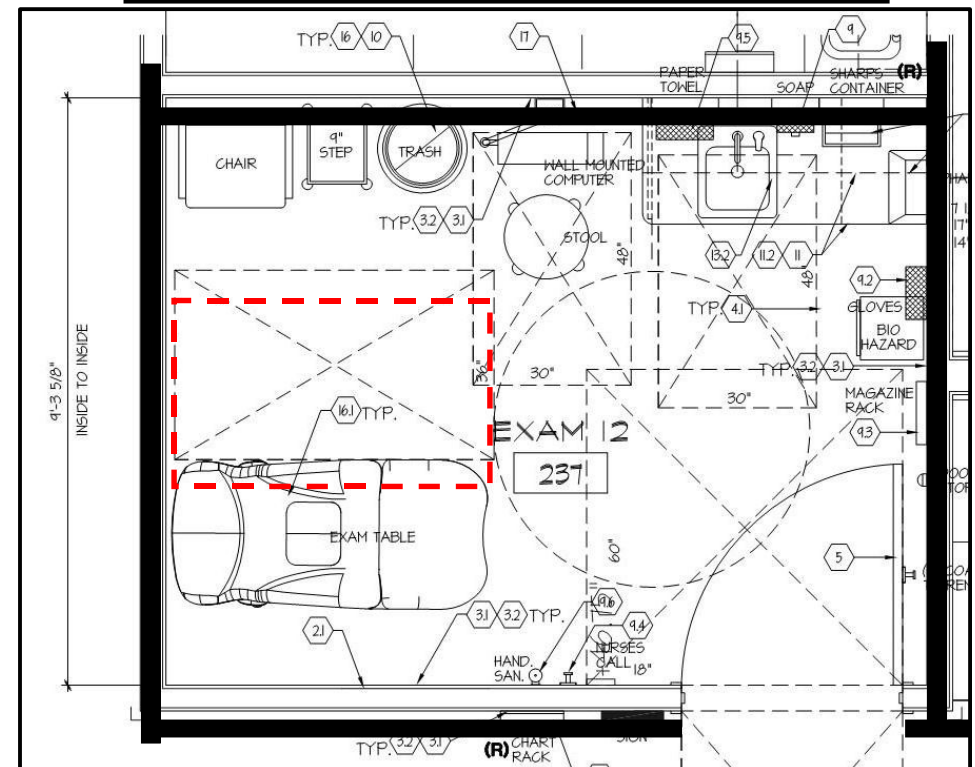
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6.3 – Examination Rooms

- A. Exam Rooms.** There must be a 36" clear aisle along the full length of one-side of exam room tables.
- B.** The vast majority of Sutter exam rooms qualify as 'general' exam rooms and are not located in an 'emergency setting' and are therefore eligible for the exception which requires the 36" aisle at only one-side of the exam table.
- C. Exam vs. Diagnostic and Treatment:** Rooms are generally classified either as 'examination' rooms, 'treatment' rooms, or 'diagnostic' rooms (diagnostic room examples: X-ray, CT scan, MRI etc.) Rooms that are designed strictly as 'examination' rooms are considered to be less intensive, and are therefore held to a lower standard than 'diagnostic' and 'treatment' rooms and thus are allowed to have the 36" aisle at one-side only.

It is understood that the function of an exam room involves a small degree of 'treatment' which might cause confusion about when a room is considered to be an 'exam' room, and when it is considered to be a 'treatment' room. It is commonly accepted that 'breaking the skin' is only allowed in 'procedure rooms'. Giving shots, taking blood samples, applying an ointment, and other similar non-invasive procedures are generally allowed in an 'examination room' without changing the designation to a 'procedure room'.

The floor plan shown below illustrates a 36" aisle on one-side of the exam room table.



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D. The term '**Emergency Setting**' is not defined in the code, but essentially refers to examination rooms that are within the Emergency Department, or are deemed by HCAI / OSHPD to constitute an 'emergency setting' (similar in nature to an emergency room or emergency service space).

Note: It is uncommon for a pure 'examination' room to be provided as part of an Emergency Department, or in a location where HCAI / OSHPD or an AHJ may deem it as an 'emergency setting'. A triage area within an Emergency Department may be considered as an exam room in an 'emergency setting', however, it depends on the specific situation. Any unresolved questions regarding such disposition will be determined by HCAI / OSHPD or the AHJ.

E. The term '**General Exam Room**' is not defined in the code but is identified in HCAI / OSHPD Code Application Notice CAN 2-11B to be an examination room that fits the definition of an 'examination room', and as such is not outfitted with specialized equipment. 'Standard' equipment in a 'general exam room' would include a 'standard' exam table, a hand washing fixture, a blood-pressure gauge, etc. The 2019 CBC definition of an 'examination room' is shown below:

"A room with a bed, stretcher, or examination table and capability for periodic monitoring (e.g., measurement of blood pressure or pulse oximetry) in which procedures that do not require a specialized suite can be performed (e.g., pelvic examination, blood transfusion).

F. '**Specialty Exam Rooms**' while not defined in the code are understood to be those exam rooms that have specialized equipment and/or function. The following are examples of 'Specialty Exam Rooms' that would not qualify for the exception, and would thus require an aisle on both sides:

EEG Testing – Neurology
EMG Testing – Neurology
Echo Testing Room
EKG Testing

Ultrasound
Vascular Lab / Testing
Pulmonary Function
Audio Testing
Etc. Etc. Etc.

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6.3 – Examination Rooms

G. Special Considerations: Some types of exam, diagnostic and treatment rooms need special consideration due to the nature of the medical treatment and/or equipment, and will not function properly with an aisle on both sides. Furthermore, some exam, diagnostic and treatment rooms do not have an exam table, bed, gurney or lounge chair; in which case, this code section does not apply at all, but rather Section 11B-805.4.2. is applicable, which simply requires:

“Clear space complying with Section 11B-305.2 shall be provided as required for specific equipment.” (Requires a 30” x 48” space)

In any situation where the application of code section 11B-805.4 is either:

1. Unclear, or
2. When a literal application of this code section would change the way Sutter practices medicine,

Then, the project team should consult with the PAC group to determine appropriate locations for access aisles and to coordinate with the ‘authority having jurisdiction’.

(In some cases, when multiple stations are provided within the same room, it may be sufficient to provide a single compliant station.)

Room types that may need special considerations are listed below:

Head and Neck Exam Room
Optometry Exam
Ophthalmology Exam
Stress Testing
Injection Station
Phlebotomy Room
Mammography Testing



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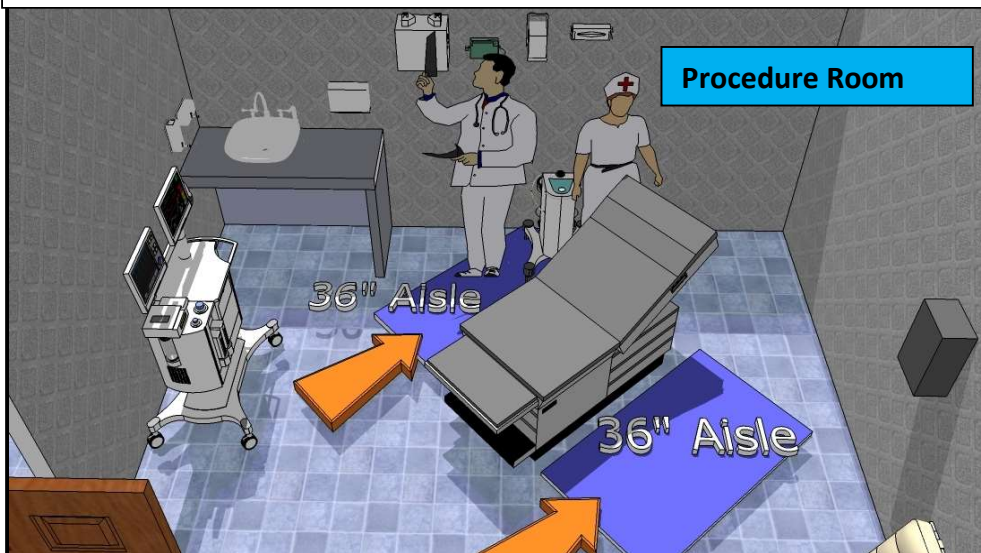
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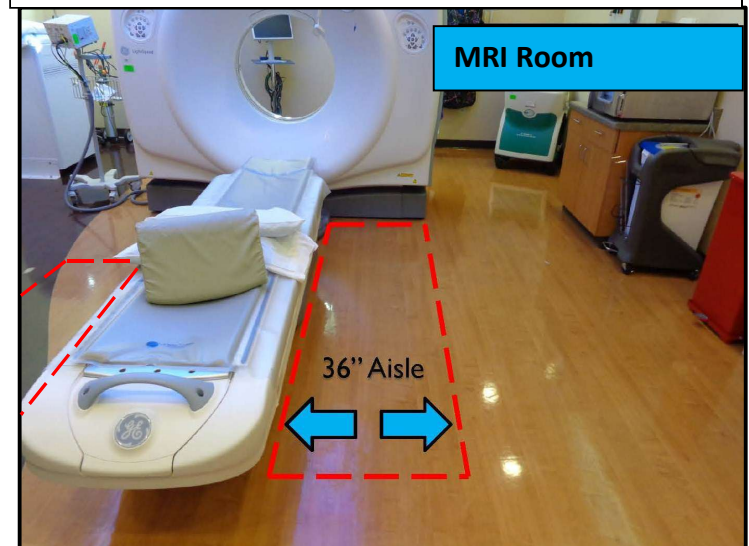
6.4 – Procedure Tables, Lounge Chairs, Gurneys

- A. **CBC Section 11B-805.4.1 Beds, exam tables, procedure tables, gurneys and lounge chairs.** A 36" minimum wide clear space shall be provided along the full length of each side of beds, exam tables, procedure tables, gurneys and lounge chairs.
- B. A 36" wide clear space must be provided on the full-length of both sides of said tables, gurneys and lounge chairs.
Note: HCAI / OSHPD interpretations in CAN 2-11B includes a 36" clearance at the FOOT of all exam / treatment tables.
- C. The list of 'beds, exam tables, procedure tables, gurneys and lounge chairs' is not an all-inclusive list, and is understood to apply to other similar items even if given a slightly different name or title.

In the rendering shown below, a 36" aisle is provided along the full length of both sides of a procedure table.



In the photo shown below, a 36" aisle is provided along the full length of both sides of the MRI.



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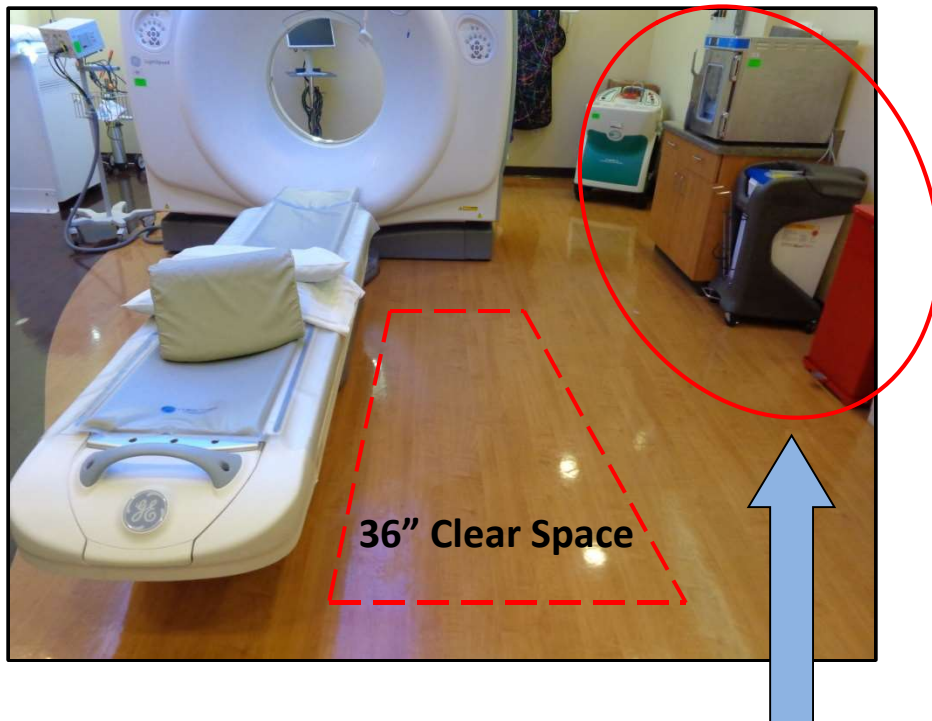
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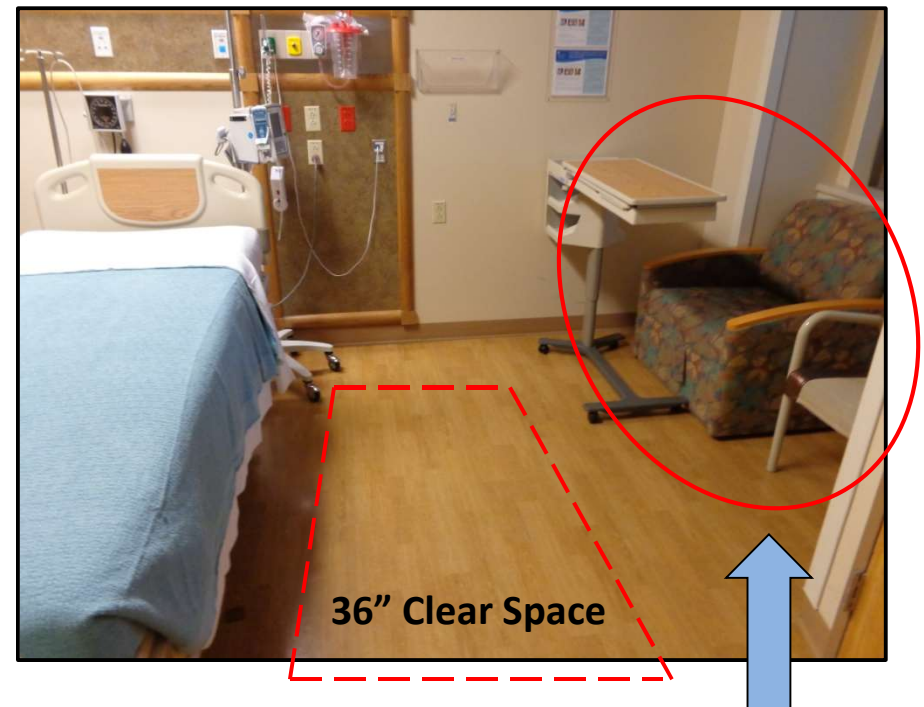
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6.5 – Furniture and Equipment

- A. Furniture and Equipment shall have a 'Home Base' location that is not within any required clear space.
- B. It is understood that the medical care of patients will unavoidably require temporary placement of medical equipment in the required clear space and is not considered to be a violation of this code requirement.



'Home Base' location for Furniture and Equipment



'Home Base' location for Furniture and Equipment

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6.6 Wall Mounted Equipment

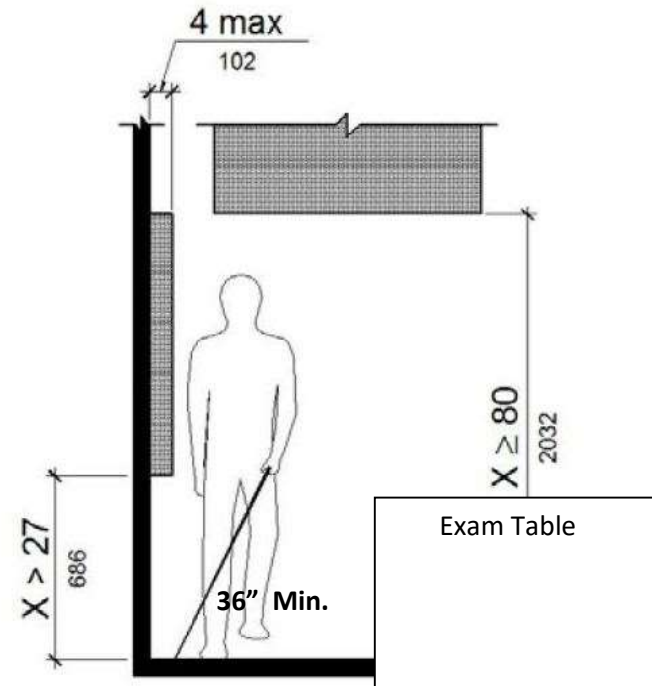
- A.** In many floor plan layouts, the 36" clear space requirement effectively creates an aisle between the room's wall and the bed, table, gurney or lounge chair, and as such, should be handled in a similar fashion.

Sutter PAC representatives have discussed this issue at length with HCAI / OSHPD staff that was responsible for writing code Section 11B-805.4.1. Sutter has concluded that it was not the intent of OSHPD to disallow any wall mounted objects that protrude into the 36" clear space.

- B.** Sutter has also concluded that wall-mounted objects must be interpreted on a case-by-case basis, and will be handled in a manner similar to wall-mounted objects that intrude into either 'circulation paths' or 'accessible routes'.

It is generally considered compliant to allow an object that protrudes no more than 4" from the wall surface, and is above a 34" height (to avoid wheelchair obstruction), but this is a matter that is open to interpretation.

- C.** Regardless of how deep an object projects from a wall surface, when an object is large enough that it effectively limits the useable space, it will be considered as defining the 'face of wall' from which the 36" clearance is measured. Thus, an object that is only 3" deep, but covers a large section of the wall will require a 36" clearance in addition to the 3" object depth.



Example: A wall-mounted object protrudes into the 36" clear space as required by 11B-805.4.1.

Allowance of such an element is subject to compliance with other applicable code requirements such as:

Protruding Objects – 11B-307.2

Accessible Routes – Clear width - 11B-403.5.1