

ELECTRONIC HEALTH RECORDS AND WRITING SURFACES

BIN 9

Author: Bill Zellmer AIA, CASp	Issue Date: January 9, 2015	Sutter Health - Physical Access Compliance
Sutter PAC Group	Revisions: March 7, 2022	Barrier Interpretation Notice (BIN)

Topic No.	Topic Name	Brief Description	2019 CBC - Code Text:	2010 ADA Standards - Text:	Sutter Guidance	Additional Information
1	Code Text -1224	Building code requirements to provide a location for written or <u>electronic documentation at exam and treatment rooms</u> . This new requirement was approved by the CBSC and became effective as of July 1, 2015.	<p>1224.4.4 Support Areas for patients.</p> <p>1224.4.4.1 Examination and treatment rooms .</p> <p>1224.4.4.1.1 Examination room. Unless specified elsewhere, if an exam room is provided, it shall have a minimum clear floor area of 80 square feet, the least dimension of which shall be 8 feet. The room shall contain a handwashing fixture and <u>accommodations for written or electronic documentation shall be provided.</u> 1224.4.4.1.2 Treatment room. Unless specified elsewhere, if a treatment room is provided, it shall have a minimum clear floor area of 120 square feet, the least dimension of which shall be 10 feet. A minimum of 3 feet is required between the sides and foot of the bed/gurney/table and any wall or other fixed obstruction. The room shall contain an examination light, work counter for medical equipment, a handwashing fixture, cabinets, medication storage <u>and counter space for writing or electronic documentation.</u> Multi-bed treatment rooms shall have separate patient cubicles with a minimum clear floor area of 80 square feet per cubicle. Each cubicle shall contain an examination light, counter and storage facilities. In multi-bed treatment rooms, a handwashing fixture shall be provided in the room for each three or fewer cubicles.</p>	N/A	This requirement in 1224 requires that a means must be provided for <u>written or electronic documentation</u> at exam and treatment rooms. These elements must be 'accessible' as further required in chapter 11B (see below).	See Detail Page 9.1
2	Equipment Consoles	HCAI / OSHPD has provided guidance on page 31 of their Code Application Notice "CAN 2-11B" that the writing surfaces whether they are countertops, or 'equipment consoles' must be 'accessible'. The document further explains the requirements for 'equipment consoles'.	See Detail Page 9.2	N/A	The technical requirements for Electronic Health Record installations are simply a 30" x 48" clear floor space in front of the electronic device. It is understood that this type of installation is inherently adjustable, therefore, issues of installation at a 34" height and with adequate knee space are not an issue.	See Detail Page 9.2

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Topic No.	Topic Name	Brief Description	2013 CBC - Code Text:	2010 ADA Standards - Text:	Sutter Guidance	Additional Information
3	Protruding Object: Side Approach	Wall hung Electronic Health Record fixtures may constitute a 'Protruding Object' hazard to the sight impaired.	CBC Section 11B-307.2 Protrusion limits. Objects with leading edges more than 27 inches and not more than 80 inches above the finish floor or ground shall protrude <u>4 inches maximum</u> horizontally into the <u>circulation path</u> .	Same.	All EH-R Installations will protrude far beyond 4". Therefore, if the installation can be approached from the side, then it must be placed in a manner that it will be <u>protected</u> from a side approach. Some exceptions will be made depending on floor plan layout and direction of travel.	See Detail Page 9.3
4	Protruding Object: Front Approach	Wall hung Electronic Health Record fixtures may constitute a 'Protruding Object' hazard to the sight impaired.	CBC Section 11B-307.3 Post-mounted objects. Free-standing objects mounted on posts or pylons shall overhang circulation paths <u>12 inches maximum</u> when located 27" inches minimum and 80 inches maximum above the finish floor or ground.	Same.	When it is only possible to approach the EH-R installation from the front, then the maximum protrusion distance allowed is <u>12"</u> . It is considered as reasonable that the folding, adjustable nature of the fixtures is sufficient to allow reduction to a 12 inch maximum protrusion. <u>No further mitigating measures are required.</u>	See Detail Page 9.4
5	Circulation Path Defined	The definition of 'Circulation Path' has been interpreted by the Access Board and most experts in a very broad manner.	CBC Section 202 Definitions (DSA-AC): Circulation Path. An exterior or interior way of passage provided for pedestrian travel, including but not limited to, walks, hallways, courtyards, elevators, platform lifts, ramps, stairways, and landings.	Same.	In alignment with the US Access Board, Sutter Health accepts that in most exam and treatment rooms, the circulation areas within the room will be considered as meeting the definition of a 'circulation path'. Note: HCAI / OSHPD interpretation in CAN 2-11B page 24 interprets 'Circulation Path' in a way that is more lenient.	See Detail Page 9.5

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9.1 – Code Text

A. Code Text: 1224.4.4 Support Areas for patients.

1224.4.4.1 Examination and treatment rooms.

1224.4.4.1.1 Examination room. Unless specified elsewhere, if an exam room is provided, it shall have a minimum clear floor area of 80 square feet the least dimension of which shall be 8 feet. The room shall contain a handwashing fixture and **accommodations for written or electronic documentation** shall be provided.

1224.4.4.1.2 Treatment room. Unless specified elsewhere, if a treatment room is provided, it shall have a minimum clear floor area of 120 square feet, the least dimension of which shall be 10 feet. A minimum of 3 feet is required between the sides and foot of the bed/gurney/table and any wall or other fixed obstruction. The room shall contain an examination light, work counter for medical equipment, a handwashing fixture, cabinets, medication storage and **counter space for writing or electronic documentation**. Multi-bed treatment rooms shall have separate patient cubicles with a minimum clear floor area of 80 square feet per cubicle. Each cubicle shall contain an examination light, counter and storage facilities. In multi-bed treatment rooms, a handwashing fixture shall be provided in the room for each three or fewer cubicles.

B. New Code – Enforceable starting July 1, 2015.

The text shown above is an approved amendment to the CBC , with an enforcement date set for July 1, 2015. Technically speaking, OSHPD cannot enforce this code section until July 2015, but it nonetheless identified in OSHPD’s CAN 2-11B pages 17 and 18.

C. Writing Surfaces - Accessible.

The central point of concern is that starting July 1, 2015, all examination and treatment rooms in medical facilities will be required to provide either:

1. A writing surface, which actually translates to a *work surface* meeting the **accessibility** requirements of 11B-902; which has a maximum height of 34” and is required to provide compliant toe and knee space per 11B-306. or
2. An electronic means of documentation, accessible per CAN 2-11B (See Detail page 9.2 of this document).

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9.2 – Equipment Consoles

A. Code Text: CBC Section 11B-805.7 Built-in Cabinets and Work Surfaces.

B. OSHPD CAN 2-11B Page 18:

“INTERPRETATION:

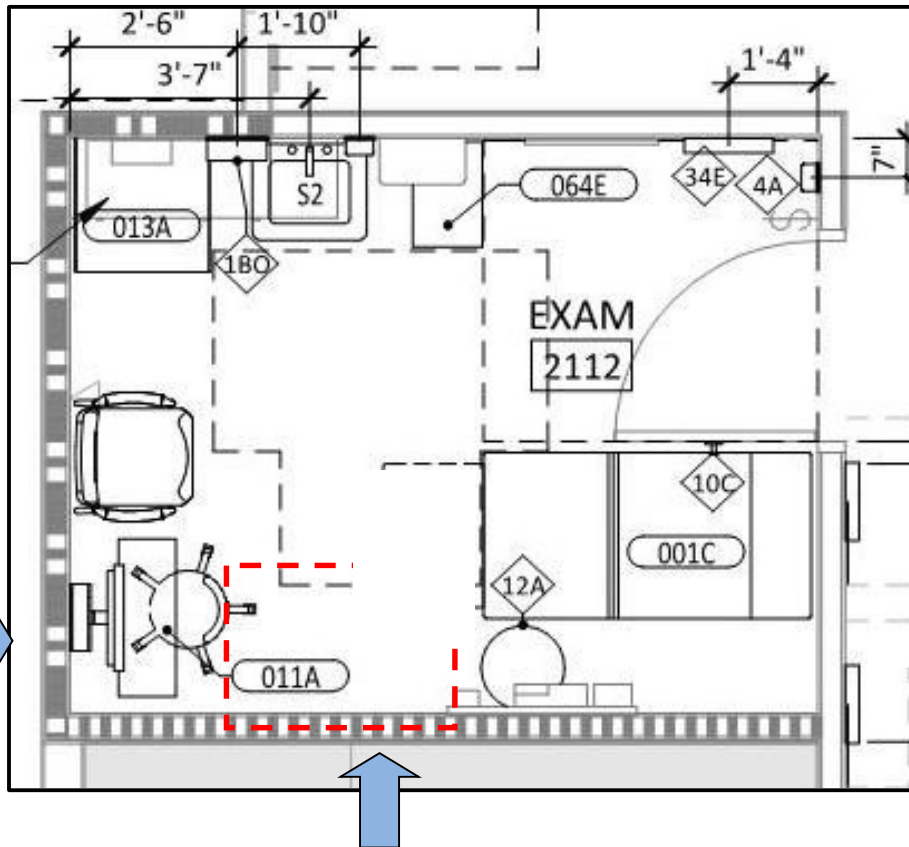
Built-in equipment consoles include recessed or wall mounted Electronic Medical Record (EMR) systems. These units must also comply with US Access Board Section 508 Standards for Electronic and Information Technology. **A 30 inch by 48 inch clear floor space**, in compliance with Section 11B-305, shall be centered in front of the display screen. Wall-mounted units shall comply with protrusion limits prescribed in Section 11B-307.2. Touch screen units shall be allowed to be vertically mounted with the centerline of the display screen no more than 52 inches above the floor in compliance with Section 11B-707.7.1.1. These units will need the capability of an alternate input method such as a wireless keyboard made available to those who would need it.”



30" x 48" Clear Floor Space

				9.3 – Protruding Objects - Side
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- A. Code Text: CBC Section 11B-307.2 Protrusion limits.** Objects with leading edges more than 27 inches and not more than 80 inches above the finish floor or ground shall protrude 4 inches maximum horizontally into the circulation path.
- B. Protection from SIDE.** All Electronic Health Record Installations will protrude far beyond 4". Therefore, if the installation can be approached from the side, then it must be placed in a manner that it will be protected from a side approach.



The Electronic Healthcare Records fixture is positioned so that it cannot be approached from the side, and therefore it does not constitute a 'protruding object'.

Note: OSHPD CAN 2-11B requires a 30" x 48" space in front of the fixture.

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9.4 – Protruding Objects - Front

- A. Code Text: CBC Section 11B-307.3** Post-mounted objects. Free-standing objects mounted on posts or pylons shall overhang circulation paths 12 inches maximum when located 27" inches minimum and 80 inches maximum above the finish floor or ground.
- B.** The front approach to the Electronic Health Records requires compliance with a 12" maximum protrusion.



The Electronic Healthcare Records fixture is positioned so that it can only be approached from the front, therefore the 12" maximum 'Protruding Object' standard is applicable.

Note: While the 12" maximum protrusion limit is exceeded, it is also clear that the keyboard could be pushed back or folded up if needed. Additionally, the chair (or stool in many cases) provides additional cane detectable protection.

No further work is needed. This installation would be considered as compliant.

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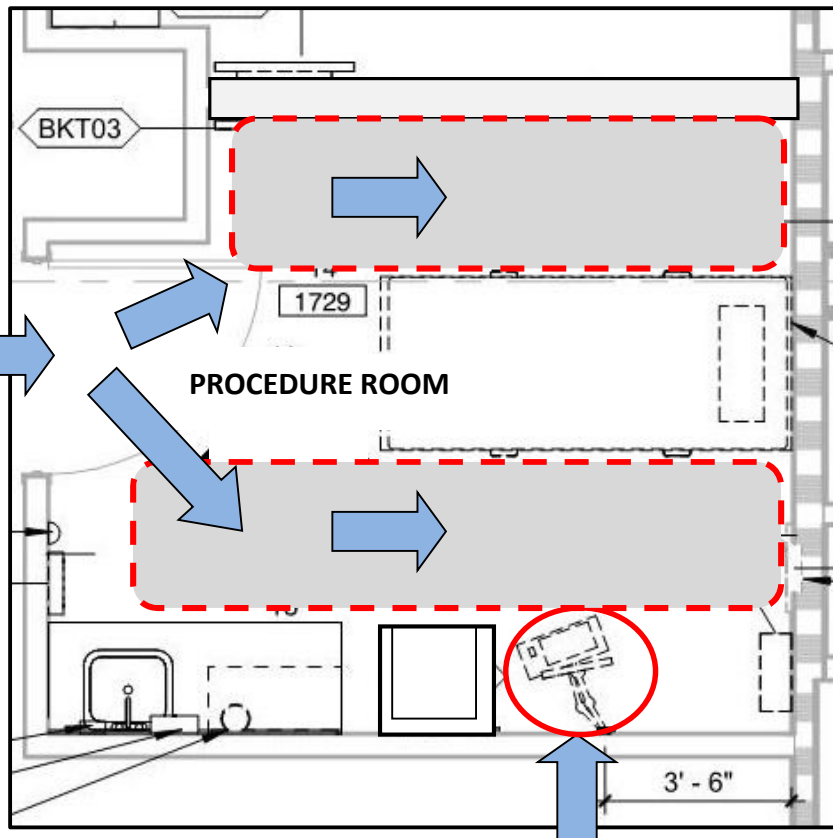
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9.5 – Circulation Paths

A. Code Text: CBC Section 202 Definitions (DSA-AC):

Circulation Path. An exterior or interior way of passage provided for pedestrian travel, including but not limited to, walks, hallways, courtyards, elevators, platform lifts, ramps, stairways, and landings.

B. Protruding Objects exist only to the extent that they occur at a 'Circulation path'. The definition of a 'circulation path' is interpreted to include the aisles along patient beds, exam tables and gurneys.



In the figure shown, the Electronic Health Record fixture is positioned so that it does not intrude on the shaded 'circulation paths'.

In this situation, the 'circulation path' is defined by the face of the base cabinet and adjacent chair, and the alcove is not considered as part of the circulation path.

No further work is needed. This installation would be considered as compliant.