



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Division of Public and Behavioral Health
Helping people. It's who we are and what we do.



November 23, 2020

Memorandum

To: Jon Pennell, DVM, Chairperson
State Board of Health

From: Lisa Sherych, Administrator
Division of Public and Behavioral Health

RE: Renown South Meadows Medical Center

Subject: Case #713: Renown South Meadows Medical Center's Request for Variance to NAC 449.3154.2, *Guidelines for Design and Construction of Hospitals*, Sections 2.2-2.2.2.6 Patient Toilet Room. See Section 2.1-2.2.6 for requirements. Section 2.1-2.2.6(2) Toilet Room Features. A handwash station. See Section 2.1-2.8.7 for requirements.

Staff Review

NAC 449.3154.2 states, "Except as otherwise provided in this section, any new construction, remodeling or change in the use of a hospital must comply with the applicable provisions of the guidelines adopted by reference in paragraphs (c) and (d) of subsection 1 of NAC 449.0105, unless the remodeling is limited to refurbishing an area of the hospital, including, without limitation, painting the area, replacing the flooring in the area, repairing windows in the area and replacing window or wall coverings in the area."

NAC 449.0105.1.(c) states, "The State Board of Health hereby adopts by reference:

(c) *Guidelines for Design and Construction of Hospitals*, in the form most recently published by the Facility Guidelines Institute, unless the Board gives notice that the most recent revision is not suitable for this State pursuant to subsection 2. A copy of the guidelines may be obtained from the Facility Guidelines Institute AHA Services, Inc., P.O. Box 933283, Atlanta, Georgia 31193-3283, at the Internet address <http://www.fgiguideines.org/> or by telephone at (800) 242- 2626, for the price of \$200."

Guidelines for Design and Construction of Hospitals (2018 Edition):

- Sections 2.2-2.2.2.6 Patient Toilet Room. See Section 2.1-2.2.6 for requirements.
- Section 2.1-2.2.6(2) Toilet Room Features. A handwash station. See Section 2.1-2.8.7 for requirements.

The 2018 Edition of the *Facility Guidelines Institute* (FGI Guidelines) requires there be a hand wash station in both the patient room and in the patient bathroom. Renown South Meadows Medical Center (RSMMC) is a 115 bed licensed hospital in Reno, Nevada. RSMMC is reclaiming space on the first floor (39 of the 115 beds) that was recently vacated by a former tenant (hospital within a hospital) at this campus. RSMMC originally applied for a license December 1998. The requirement at that time only required that a hand wash station be available either in the patient room or in the patient bathroom. The patient rooms on the first floor are equipped with hand wash station in the rooms and not in the bathrooms. The building's first floor layout for adding an additional

hand wash station within the patient bathrooms would require considerable remodeling and expense. Thus, the request for variance from adding another sink into the patient room bathrooms.

The definition of a hand wash station per the FGI Guidelines is “An area that has a sink with a faucet that can be operated without using hands; cleansing agents; and means for drying hands.”

Intent of the Regulation:

The intent of the regulation in having hand wash station readily available in both the patient’s bedroom and in the patient’s bathrooms are to allow for hand hygiene for staff, the patient(s) and any visitors to limit the spread of infections from one room to another and between persons.

Degree of risk to public health and safety:

The risk of transmission of pathogens is ever present in hospitals. Some estimates range the transmission between 5% to 10%, with the most common organism including Staphylococcus aureus, Pseudomonas aeruginosa, and E. Coli per Centers for Disease Control and Prevention (CDC). Typical infections occurring with the urinary tract, pneumonia, bacteremia, gastrointestinal, skin, and surgical site wounds. Hand hygiene is known to help in the prevention of these transmissions. The health care industry has migrated towards including more sinks, with specific sinks sizes and features to address nosocomial infections.

Exceptional and undue hardship:

The facility indicated to include the bathroom sinks were estimated to be approximately \$32,000.00 per patient room (24 rooms) with an overall cost of \$768,000.00. The facility also indicated an opportunity cost exists for not have the patient room available for patients when a sink is installed for each patient room (single or double occupancy).

Staff Recommendation

Staff recommends that the Board of Health approve Variance #713 with stipulations for Renown South Meadows Medical Center’s (RSMMC) request to NAC 449.3154.2, *Guidelines for Design and Construction of Hospitals*, Sections 2.2-2.2.2.6 Patient Toilet Room. See Section 2.1-2.2.6 for requirements. Section 2.1-2.2.6(2) Toilet Room Features. A handwash station. See Section 2.1-2.8.7 for requirements.

Staff recommends approval of RSMMC variance request to not install the bathroom hand wash stations with the following stipulations:

- 1) The facility modifies the first floor patient bathroom doors’ hardware to allow for hands free operations to open the doors outward into the patients’ rooms, where there is a sink; and
- 2) The door hardware to be acceptable to both RSMMC and the Division of Public and Behavioral Health.

Public Comments: None

Presenter: Steve Gerleman, Health Facilities Inspection Manager, Bureau of Healthcare Quality and Compliance

Attachments: None.