

Pfeiffer, Nadine

From: Eli Powell <EPowell@leachwallace.com>
Sent: Friday, September 01, 2017 2:09 PM
To: Rulescoordinator, Dhsr
Subject: Comment on Proposed Repeal of Hospital Construction Rules 10A NCAC 13B

To Whom It May Concern;

I am writing to comment on the proposed repeal of the hospital construction rules 10A NCAC 13B (10A NCAC 13B .6001, .6002, .6104, .6201-.6206 and .6208-.6227.). My name is Eli Powell. I am a licensed professional engineer engaged in the design and construction of many healthcare facilities throughout the State. These rules directly impact my day to day work.

I am writing today to respectfully request that changes made to 10A NCAC 13B (Hospital facilities rules) also be enacted to 10A NCAC 13C (Licensing of Ambulatory Surgical Facilities). These regulations are similar in many respects, and the proposed temporary rules (FGI Guidelines for Design and Construction of Hospitals and Outpatient Facilities) include applicable guidelines for facilities regulated under 10A NCAC 13C. Implementing this request would greatly simplified the design and construction of healthcare facilities in the State, while at the same time providing suitable, high quality, effective, safe facilities. Further, this change would simplify the review and enforcement of healthcare regulations in the State as both 10A NCAC 13B and 10ANCAC 13C would reference a common standard.

To be clear, I am not advocating that Hospitals and Ambulatory Surgical Facilities be designed and constructed equally. The proposed temporary rules (FGI Guidelines) include separate sections for Hospitals and Ambulatory Surgical Facilities, and I am requesting these sections be enforced as applicable.

The enclosed comments represent my personal opinions and should not be construed as an official position of my employer. Thank you for your time and consideration.

Sincerely,

Eli Powell, P.E., LEED AP
Mechanical Project Engineer
Licensed in NC

Leach Wallace Associates, Inc.
CONSULTING ENGINEERS
2201 South Boulevard, Suite 230, Charlotte, NC 28203
P: 704.335.0485 C: 303.775.7118 F: 704.335.0482
www.leachwallace.com | [Facebook](#) | [LinkedIn](#)

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