

# Proposal Summary

## Healthcare Exceptions

Updated Wednesday, July 24, 2025

Prepared by: Dong-Hyeon Joh (Energy Solutions)

## Measure Description

The proposal seeks to eliminate selected exceptions for healthcare facilities in the building energy code. Specifically, for new construction, it would remove or revise exceptions in Sections 120.2(e), 140.4(d), and 140.4(m) in Title 24, Part 6. For existing buildings, the exceptions would be modified or removed in Sections 141.0(b)2.

For new construction, the removal or modification of exceptions is centered around HVAC system requirements. However, as healthcare facilities must comply with other national standards, state codes and the requirements of California Department of Health Care Access and Information (HCAI), (formerly the Office of Statewide Health Planning and Development (OSHPD)), the changes impacting Sections 140.4(d) and 140.4(m) would modify the exceptions to comply with standards called out in ASHRAE 90.1 (Section 6.5.3.2.4), and the California Mechanical Code (CMC) Table 4A, to maintain the required pressure and air flow for these spaces.

For existing buildings, exceptions for healthcare facilities are centered around building envelope, HVAC, and lighting requirements. However, rather than a wholesale approach to removal of all exceptions, threshold limits would be studied to allow for a cost effective update for alterations and additions for healthcare facilities.

Table 1 summarizes the scope of the proposed code change.

**Table 1: Scope of Proposed Code Change**

An "X" indicates the proposed code change is relevant.

<b>Building Type(s)</b>		single family	<b>Construction Type(s)</b>	X	new construction
		multifamily		X	additions
	X	nonresidential		X	alterations
<b>Type of Change</b>	X	mandatory	<b>Updates to Compliance Software</b>		no updates
	X	prescriptive		X	update existing feature
	X	performance		X	add new feature

Third Party Verification		no changes to third party verification	
	X	update existing verification requirements	
	X	add new verification requirements	

## Justification for Proposed Change

The proposed code changes would have positive impacts in both energy savings and compliance improvement. By removing exceptions or modifying them, healthcare designers and builders have a more consistent building energy code requirement across the non-residential spaces.

Energy savings would come from allowing HVAC systems to turn down to more efficient levels in zones and sections of the healthcare facility where it would be safe to do so. Improving building envelopes, lighting, and HVAC requirements for existing buildings without compromising occupant safety by aligning with relevant CMC requirements.

The proposed measure would have an added benefit of aligning the HCAI requirements with Title 24, Part 6 requirements, which in turn helps to reduce code complexity and potential for conflicting code requirements.

There are exceptions for healthcare facilities throughout the Title 24 Part 6 requirements, and this has been an interest to both the California Energy Commission (CEC) and HCAI to bring an alignment for building energy codes in healthcare facilities. By focusing on a few large energy saving exceptions, this would hopefully be the first step in addressing all exceptions to healthcare facilities in subsequent code cycles.

## Data Needs / Information Requests

The Statewide CASE Team is seeking the following information to inform the code change proposal. Data may be provided anonymously. To participate or provide information, please email Dong-Hyeon Joh, [djoh@energy-solution.com](mailto:djoh@energy-solution.com) directly and copy [info@title24stakeholders.com](mailto:info@title24stakeholders.com).

New Construction and Existing Buildings:

- Are the testing requirements should be in compliance with Title, Part 6, in addition to the HCAI's testing and inspection requirements?
- Should there be one compliance form dedicated to healthcare facilities?
- Should there be a dedicated mechanical system for critical spaces?
- Should there be multiple baseline systems for hospitals and skilled nursing home facilities?
- Should there be performance credit for hospital facilities?
- Should the 300 TR threshold limitation for air-cooled chillers be the same as for other NR buildings?
- What should be the building area threshold for removing/modifying existing building exceptions? Meeting Title 24, Part 6 requirements for small facilities may not be cost-effective.
- Looking for information on current compliance practice under the performance path. What improvement should be made to improve compliance and reduce the burden on enforcement?
- Should there be a renewable energy and battery storage requirement for healthcare facilities?
- What is the cost for air leakage testing and verification in hospital buildings?
- How common is it to see simultaneous heating and cooling in healthcare buildings?
- What are the typical supply air and supply water reset temperatures used in healthcare facilities?
- Is ASHRAE Guideline 36 typically followed in newly constructed buildings? what are some control strategies are used in existing buildings?

## Draft Code Language

---

### 1.1 Guide to Marked Up Language

The proposed changes to the Standards and Reference Appendices are provided below. Changes to the 2025 documents are marked with blue underlining (new language) and ~~strikethroughs~~ (deletions).

### 1.2 Title 24, Part 1

There are no proposed changes to Title 24, Part 1.

### 1.3 Title 24, Part 6

#### 120.2(e) Shut-off and reset controls for space-conditioning systems.

~~Exception to **Section 120.2(e)**: Systems serving healthcare facilities.~~

#### 140.4(d) Space-conditioning zone controls.

~~Exception 5 to **Section 140.4(d)**: Systems serving healthcare facilities.~~

#### 140.4(m) Fan control.

~~Exception 2 to **Section 140.4(m)**: Systems serving healthcare facilities.~~

### SECTION 141.0 – ADDITIONS, ALTERATIONS, AND REPAIRS TO EXISTING NONRESIDENTIAL, AND HOTEL/MOTEL BUILDINGS, TO EXISTING OUTDOOR LIGHTING, AND TO INTERNALLY AND EXTERNALLY ILLUMINATED SIGNS

**Exception to Section 141.0:** Alterations to healthcare facilities shall not be required to comply with the provisions of this Section, except where explicitly specified in Section 141.0(b)2.

#### Section 141.0(b)2

**Exception 1 to Section 141.0(b)2:** The requirements of Section 120.2(i) shall not apply to alterations of space-conditioning systems or components.

**Exception 2 to Section 141.0(b)2:** The requirements of section 141.0(b)2 shall apply to healthcare facilities when the total square feet of alterations or additions is 10,000 sq ft or greater.

### 1.4 Reference Appendices

There will be updates to the reference appendices, but the full scope of the change is currently being evaluated.

1.5 Proposed Code Change Appendix

Section	Description	Code Requirement	ES Proposal
141	The whole section is currently exempted (Alterations to healthcare facilities are not required to comply with this Section).	Alterations to healthcare facilities are not required to comply with this Section.	Spaces in healthcare buildings similar to nonresidential space types, such as office space, shall meet T24.  Central Hydronic/DX systems in healthcare buildings shall meet T24.
141.0(b)1	Alterations: Roof/Ceiling, Wall and floor insulation	Mandatory: Altered components shall meet the minimum requirements in this Section:  Roof: If existing insulation is less than R7, it shall meet the new construction requirement (in the current proposal). The current minimum requirement is R14 or R8.  Wall: R-value shall be R4, R11, R13, R13 or U values of 0.28, 0.11, 0.217, 0.113 based on wall type (Spandrel, Wood, Metal Framed, and Metal building). No requirement for mass walls  Floor: Raised floor - Minimum R11. No minimum requirement for mass floors	Roof: Concerns about removing exceptions previously raised.  Similar concerns for walls and floor?
141.0(b)1	Alterations: Envelope Lighting (indoor, outdoor and sign) Any newly installed HVAC Power distribution Water heating system	Shall meet the new construction mandatory requirement	Remove exceptions
141.0(b)2.A	Fenestration U and SGHC	Shall meet 0.47 and 0.31 for U and RSGHC respectively. Some climate zones may require higher U and RSGHC values.	Remove exceptions
141.0(b)2.B.ii	Cool Roof Solar reflectivity and thermal emissivity	Shall meet new construction requirement. If U-Factor meets TABLE 141.0-B, then cool roof is not required.  Applies for lesser of 2,000 sq. ft. or 50% of roof area.	Remove exceptions
141.0(b)2.B.iii	Roof Insulation	Shall meet new construction requirement if existing roof is of lower R Value(<R7) or U Factor (<0.089)	To discuss.
141.0(b)2.C	New or Replacement HVAC system or component	Shall meet the New Construction prescriptive requirements.  For compliance with this section, additional fan power adjustment credits are available as specified in Table 141.0-D. *MERV 9 through 12: 0.5 in. of water *MERV 13 through 15: 0.9 in. of water	Remove exceptions
141.0(b)2.D	Altered Duct System	When new or replacement space-conditioning system ducts are installed to serve an existing building, the new ducts shall meet the requirements of Section 120.4.	Remove exceptions

		If the space conditioning system meets the criteria of Section 140.4(l)1, the duct system shall be sealed as confirmed through field verification and diagnostic testing in accordance with the procedures for duct sealing of an existing duct system as specified in Reference Nonresidential Appendix NA2	
<b>141.0(b)2.E</b>	Altered Space-Conditioning Systems	<p>i. A demand responsive thermostat that complies with Section 110.12 shall be installed for existing thermostat replacement and new thermostat.</p> <p>ii. Ducts connecting to the replacement or existing units shall meet duct sealing requirements per Reference Nonresidential Appendix NA2 and applicable leakage compliance criteria in Section 141.0(b)2D.</p>	Remove exceptions
<b>141.0(b)2.F</b>	New Lighting	Spaces with lighting systems installed for the first time shall meet the NC's mandatory and prescriptive requirements	<p>Power density: Remove exceptions, except for specific types of spaces to be defined.</p> <p>Lighting controls: Needs discussion</p>
<b>141.0(b)2.I</b>	Altered Lighting	<p>Alterations to indoor lighting systems that include 10% or more of the luminaires serving an enclosed space shall meet the requirements of any one of the three:</p> <p>1. shall meet the NC prescriptive LPD and controls requirements</p> <p>2. shall not exceed 80% of the indoor LPD and shall comply with lighting control requirements</p> <p>3. shall be a one-for-one luminaire alteration within a building or tenant space of 5,000 square feet or less, the total wattage of the altered luminaires shall be at least 40% lower compared to their total pre-alteration wattage, and the alteration shall comply with the lighting control requirements</p>	Remove exceptions, except for specific types of spaces to be defined.
<b>141.0(b)2.N</b>	Service Water heater	Service water-heating systems shall meet the requirements of Section 140.5, except for the solar water heating requirements.	
<b>141.0(b)2.O</b>	envelope	A building shell for which interior walls or ceilings are installed for the first time shall meet the requirements of Section 140.3(c).	Remove Exception
<b>141.0(b)2.P</b>	Electrical Power Distribution Systems.	Alterations to electrical power distribution systems shall meet the applicable requirements of Section 130.5	Remove Exception
<b>141.0(b)2.Q</b>	Air leakage	Existing building envelope wall where at least 25% or more of the wall area is being altered must comply with Section 140.3(a)9. Where the building is tested in accordance with the procedures for whole building air leakage in NA2.45.1 and the tested leakage rate exceeds 0.4 cfm/ft2 of building shell at 75 pa. A Visual Inspection and Diagnostic Evaluation shall be done in accordance with NA2.4.75.7 and all observed leaks shall be sealed where such sealing can be made without destruction of existing building components.	Remove Exception
<b>141.0(b)2.R</b>	Exterior doors.	Alterations that add exterior door area shall meet the U-factor requirements of Section 140.3(a)7.	Remove Exception