



Indian Health Service
Office of Environmental Health & Engineering
Division of Engineering Services

Date: February 1, 2017
From: Director, Division of Engineering Services
Authority Having Jurisdiction
Subject: Dental Nitrous Oxide use and Building Occupancy
To: Health Facilities Advisory Committee

Background:

A workgroup comprised of IHS oral health, engineering, and institutional environmental health professionals has completed a review of the current IHS guidance to require dental patient treatment space to be classified as Ambulatory Health Care Occupancy if the NFPA 101 (Life Safety Code) criteria are met, including primarily if the facility is used to provide services or treatment simultaneously to four or more patients (see attached).

The workgroup concluded that IHS dental facilities that utilize nitrous oxide is considered minimal sedation and would not result in patients becoming incapable of self-preservation. Further, patients (including children) under minimal sedation would not require physical assistance from staff to travel through the route of egress. The workgroup has recommended to the Authority Having Jurisdiction (AHJ) that IHS dental facilities/departments using only minimal sedation be considered Business Occupancies and that future dental facilities be constructed as Business Occupancies, unless consultation between dental department management and facilities engineering management conclude that services beyond minimal sedation will be offered, which would necessitate the more protective Ambulatory Health Care Occupancy.

Decision:

As the AHJ for the IHS, per the IHS Technical Handbook, Chapter 24-2.5, the workgroup's recommendation that the use of minimal sedation in dental facilities not be construed to render patients incapable of self-preservation is accepted and approved. Pursuant to this AHJ approval, the HFAC is requested to update the respective IHS Technical Handbook chapters that define IHS dental facility space and consider the Business Occupancy designation be permitted when only minimal sedation is utilized unless consultation between the dental department management and the facilities department management conclude a more protective Ambulatory Health Care Occupancy is warranted.

/Michael Weaver/

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Attachments

cc:

Joseph Bermes, Deputy Director for Architecture and Engineering, DES
Nick Lu, DES, Chairperson, Codes Committee