

June 24, 2026

**Indiana Department of Health
Consumer Services and Health Care Regulatory Commission
Division of Acute Care and Continuing Care
Health Care Engineering Program**

Deemed Approval for Hospital Temporary Use of Class 1 Mobile Radiology Units

IDOH CSHCRC: Limited Waiver: Plan Review for Class 1 Mobile Units

Number: **AC-2026-01 Hospital**

Effective Date: June 24, 2026

Created: June 24, 2026

Cancels: None

Reviewed: n/a

Revised: n/a

PROGRAM ADVISORY SUMMARY

- **Effective Date: June 24, 2026**
- **410 IAC 15-1.5-8(c)(7) As early in the construction, addition, or renovation project as possible, the functional and operational description shall be submitted to the division. This submission shall consist of, but not be limited to, the following:**
 - (A) Functional program narrative as established in the Guidelines.**
 - (B) Schematics, based upon the functional program, consisting of drawings (as single-line plans), outline specifications, and other documents illustrating the scale and relationship of project components is waived for the implementation of Class 1 mobile radiological units in the following situations:**
 - 1. Unplanned, unscheduled loss of a radiological service; or**
 - 2. During the down time of a scheduled replacement of the existing equipment.**
- **To use the waiver for the plan review, a Class 1 mobile radiology unit and the associated 'pad' must comply, without waiver, to the 2018 Edition of the FGI Guidelines for the design and construction of Hospitals and Outpatient Facilities as defined herein.**

Background:

Indiana hospital rules require the submission of plans for a plan review for any new construction or renovations to existing licensed structures. The plan review process does not provide for an expedited review or a means to place certain projects ahead of others awaiting review. The agency recognizes that situations exist wherein existing equipment can malfunction and cause a cessation of service without notice which impacts patient care and hospital revenue. To reduce wait time for an approval of a class 1 mobile radiology unit, the IDOH is issuing a limited waiver to the requirement for plan review which applies to only mobile radiology units and sets forth the requirements for use of the waiver. Traditionally, through the plan review process, facilities may seek a waiver from a FGI guideline resulting in implementation of an alternate means of compliance. However, that process requires additional time and communication between the agency and the design team. The waiver process defined herein eliminates the waiving of an FGI guideline applicable to a class 1 mobile radiology unit. In addition to the FGI requirements, all hospital structures must meet certain life safety code requirements established in NFPA 101 (2000 edition). Specifically, Class 1 Mobile Units fall under NFPA 101 (2000 edition) Chapter 18 if the unit provides services to inpatients of the host facility.

Requirements for utilization of this waiver:

1. The facility shall submit an attestation that the class 1 mobile radiology unit being brought onto the licensed hospital site meets without waiver or modification the following FGI Guidelines for the Design and Construction of Hospitals and Outpatient Facilities (2018 edition) applicable to Class 1 Mobile Units:
 - a. 2.8-1 Application
 - b. 2.8-3 Diagnostic and Treatment Locations
 - c. 2.8-6 Public and Administrative Area
 - d. 2.8-7 Design and Construction Requirements
 - e. 2.8-8 Building Systems
2. All applicable requirements of NFPA 101 2000 edition) Chapter 18 are met
3. The hospital shall submit the attestation no fewer than 72 hours prior to patient use.
4. The duration of the waiver is limited to 90 days from the date the unit is placed in service. Should a hospital, for good cause, require more than 90 days of service, the hospital may request 1 extension.
5. Upon receipt of the attestation, the agency will issue the hospital a notice of 'deemed approval' for use of the class 1 mobile radiology unit.
6. In the event of an onsite inspection by the agency resulting in a finding of non-compliance with one or more of the required FGI Guidelines, the 'deemed approval' shall be voided retroactively to the date the class 1 mobile unit was placed into service.



Questions:

Questions about this limited waiver may be addressed to Randy Snyder, Division Director, (317) 233-1286, email: rsnyder1@health.in.gov.

Approved by:

/s/

Jessica Krug, Assistant Commissioner
Consumer Services and Health Care Regulatory Commission
Indiana Department of Health

Attachment: Hospital Attestation for Temporary Use of Class 1 Mobile Radiology Units and Request for Deemed Plan Approval



Attachment: Hospital Attestation for Temporary Use of Class 1 Mobile Radiology Units and Request for Deemed Plan Approval

To submit a Hospital Attestation for Temporary Use of Class 1 Mobile Radiology Units and Request for Deemed Plan Approval, copy the language on the following page below onto facility letterhead. Replace the bold fields with the facility's information and submit the attestation electronically to rsnyder1@health.in.gov

REMAINDER OF PAGE LEFT BLANK INTENTIONALLY

ATTESTATION LANGUAGE TO BE COPIED BEGINS ON THE NEXT PAGE



Hospital Attestation for Temporary Use of Class 1 Mobile Radiology Units and Request
for Deemed Plan Approval

Hospital Name

Hospital Address

City, State, Zip

Facility State ID Number: **xxxxxxx**

Address where Class 1 Mobile Radiology Unit is located (on an approved off-site location of the above
licensed facility) if different from the address above (if same, indicate 'same as above':

Address

City, State Zip Code

I, ***(printed name)***, being duly authorized by the above-named facility attest that:

1. A Class 1 Mobile Radiology Unit will be placed in patient use on ***(date)*** and will not be in service more than 90 consecutive days unless an extension is requested from the IDOH and the extension is granted.
2. The location of the Class 1 Mobile Radiology Unit is on the campus of the above-named facility or an approved off-site location thereof.
3. The Class 1 Mobile Radiology Unit and all structures connected to the unit meet, in entirety, the FGI Guidelines for the Design and Construction of Hospitals and Outpatient Facilities (2018 edition) applicable to Class 1 Mobile Units:
 - a. 2.8-1 Application
 - b. 2.8-3 Diagnostic and Treatment Locations
 - c. 2.8-6 Public and Administrative Area
 - d. 2.8-7 Design and Construction Requirements
 - e. 2.8-8 Building Systems
4. All applicable requirements of NFPA 101 (2000 edition) Chapter 18 are met.

Signature, Title

Date

