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Director and State Public Health Officer

Gavin Newsom  
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Dec 18, 2025

Anka Ung  
Rady Children's Hospital Orange County  
1201 W La Veta Ave  
Orange, CA 92868

**FACILITY: Rady Children's Hospital Orange County, LICENSE # 060000011**

**APPROVAL OF PROGRAM FLEXIBILITY FOR FLEX-12882**

Dear Anka Ung,

This letter is in response to the request submitted by **Rady Children's Hospital Orange County** for program flexibility for California Code of Regulations T22 DIV5 CH1 ART8-70805.

The alternative means of compliance with T22 DIV5 CH1 ART8-70805 include

- **Overall Plan:** If approved, RCHOC will continue to use the lobby and admitting space, known as the Purple Zone, as Emergency Department (ED) overflow to care for up to 12 ED medically-screened fast track (ESI levels 4 and 5) patients. The surge/overflow Purple Zone may be activated when the ED has greater than 40 patients registered and/or ED leadership and House Supervisor or Nursing leadership determine collaboratively to open/close the Purple Zone area. The ED Purple Zone will be staffed by a dedicated team of ED nurses, technicians, and attending physicians, ensuring continuity with the department's established standards of care



and policies. Oversight of the Purple Zone will be provided by the ED Charge Nurse and the ED leadership including the ED manager and the ED director.

- **Patient Flow Process for ED Purple Zone:** All patients presenting to the Emergency Department (ED) will enter through the main ED entrance, where they will be checked in and triaged. Patients identified as appropriate for the Purple Zone, those requiring clinic-level care (ESI levels 4 and 5), will be escorted approximately 150 feet down the hall to the Purple Zone waiting area. From there, patients will be called into one of two Medical Screening Evaluation (MSE) rooms by one of the attending ED physicians. Following the screening, patients will return to the waiting area. If medications, minor treatments, or procedures are indicated, they will be brought to the RN treatment room to receive care, then returned to the waiting area while awaiting results. Once results are available, patients will be called back to the treatment area for final evaluation. After Care Instructions (ACI) will be provided, and patients will be discharged home. If at any point a patient's acuity level increases, they will be promptly transferred back to the main ED and placed in a horizontal bed for higher-level care.

- **Hours of Operation:** 0900-0200 daily.

- **Capacity:** Maximum capacity of 12 patients at one time.

- **Patient Classification:** All patients presenting to the ED who are triaged with ESI levels 4 or 5.

- **Age of patient population served in the Purple Zone:** 0 to 21 years old.

- **Inclusion Criteria:** ED Fast Track patients triaged with ESI levels 4 and 5 who are clinically stable and ambulatory. Patients requiring a wheelchair due to minor injuries may also be included.

- **Exclusion Criteria:** Patients triaged with ESI 1 or 2, isolation patients, behavioral health patients, patients requiring oxygen saturation and cardiac monitoring. No sedative medications will be administered in these areas.

- RCHOC will use internal ED waiting area identified as B1, B2, B3, B4 areas (up to 4 patients) for provider in triage (PIT) evaluation.

- RCHOC will ensure signage is visible placed to clearly designate the flexed space.
- RCHOC will conduct a comprehensive unit orientation for all assigned staff, maintain documentation of completed training, and ensure staff competency through ongoing evaluation and support.
- RCHOC will adhere to ED licensed nurse-to-patient staffing ratios per Title 22 Section 70217.
- RCHOC will adhere to licensed nurse-to-patient staffing ratios per Title 22 Section 70217.
- RCHOC will continue to provide necessary care in accordance with patient needs and make all reasonable efforts to act in the best interest of patients.
- RCHOC will ensure patient privacy and HIPPA is maintained at all times. Private and sensitive conversations will be conducted in a private area.
- RCHOC will ensure a safe rapid response/Code Blue response and maintain an age-appropriate crash cart readily available at all times.
- RCHOC will ensure necessary supplies are maintained and readily available for this space.
- RCHOC will adhere to hospital and unit specific policies and procedures.
- RCHOC will ensure pharmacy regulations and policies and procedures are followed, including safe (a) storage, (b) ordering/prescribing, (c) transcribing and verifying, (d) dispensing and delivering, (e) administering, and (f) monitoring and reporting.
- RCHOC will be in compliance with Basic Emergency Medical Services requirement as indicated in Title 22, Sections 70411-70419.

Your request for program flexibility of **T22 DIV5 CH1 ART8-70805** is approved under the following conditions:

- Hospital is approved to use internal ED waiting area identified as B1, B2, B3, B4 areas (up to 4 patients) for provider in triage (PIT) evaluation.

- Hospital is approved to use requested lobby and admitting space as Purple Zone to care for up to 12 Emergency Department (ED) Fast Track patients. The surge/overflow Purple Zone may be activated when the ED has greater than 40 patients registered and/or ED leadership and House Supervisor or Nursing leadership determine collaboratively to open/close the Purple Zone area.
- Inclusion criteria: Triage ED fast track patients (ESI levels 4-5). ED patients who are deemed stable and ambulatory (injuries needing wheelchair is ok).
- Exclusion criteria: ESI patients 1 or 2, isolation patients, behavioral health patients, patients requiring oxygen saturation and cardiac monitoring. No sedative medications will be administered in these areas.
- Hospital will adhere to ED licensed nurse-to-patient staffing ratios per Title 22 Section 70217.
- Hospital will ensure ED leadership oversight for ED patients cared for in the approved space.
- Hospital will adhere to licensed nurse-to-patient staffing ratios per Title 22 Section 70217.
- Hospital will provide a unit orientation, provide documentation of this orientation and ensure competence of the staff.
- Hospital will continue to provide necessary care in accordance with patient needs and make all reasonable efforts to act in the best interest of patients.
- Hospital will ensure signage is visible placed to clearly designate the flexed space.
- Hospital will ensure necessary supplies are maintained and readily available for this space.
- Hospital will adhere to hospital and unit specific policies and procedures.
- Hospital will ensure patient privacy and HIPPA is maintained at all times. Private and sensitive conversations will be conducted in a private area.

- Hospital will ensure a safe rapid response/code blue response and maintain an age appropriate crash cart readily available at all times.
- Hospital will ensure pharmacy regulations and policies and procedures are followed, including safe (a) storage, (b) ordering/prescribing, (c) transcribing and verifying, (d) dispensing and delivering, (e) administering, and (f) monitoring and reporting.
- Hospital will be in compliance with Basic Emergency Medical Services requirement as indicated in Title 22, Sections 70411-70419.

Either this letter or a true copy thereof shall be posted immediately adjacent to the facility's license.

This approval shall remain in effect from Dec 18, 2025 until Dec 17, 2026.

**NOTE:** The Department may revoke the program flexibility if the licensee does not comply with the conditions set forth in the approval or if the department determines the proposed alternative does not adequately meet the intent of the regulations.

If you have any questions, please contact Centralized Program Flex Unit at (916) 323-5053 or by email at [CentralizedProgramFlex@cdph.ca.gov](mailto:CentralizedProgramFlex@cdph.ca.gov).

Sincerely,

*Danielle Boles*

Danielle Boles, Program Manager  
Centralized Program Flex Unit