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**Respondent Type:** Normal Response

**Collector:** Health Care Institution Licensing  
Rulemaking (Web Link)

**Custom Value:** empty

**IP Address:** 65 73 173 187

**Response Started:** Monday, February 4, 2013 10:45:07 AM

**Response Modified:** Monday, February 4, 2013 10:49:19 AM

**1. If you have any comments or concerns about the rulemaking process or general comments about the rules, please provide your comments or concerns below:**

Regarding proposed R9-10-317 / R9-10-1020 rules for Observation/Stabilization Services: As a healthcare service provider serving a rural area, in a facility that is always at capacity and very much needed in this rural setting, I find the proposed rules for observation/stabilization services unreasonably difficult to comply with. Mandating that a medical practitioner be present in the facility at all times essentially excludes us from offering this service to our community. Just as, mandating the presence of an RN in the designated service area at all times will drive the costs of providing this service out of our reach. I understand that the motivation is to ensure the immediate availability of medical and nursing services to this recipients of care, but setting the standards for this service higher than those for inpatient services seems unreasonable. Please reconsider these requirements. Having a medical practitioner immediately available and having an RN immediately available would be more consistent with the goal of providing for recipient safety while enabling rural providers to meet these requirements cost effectively. Thank you for your consideration.