1. What parts of the draft rules do you believe are effective?
   No Response

2. How can the draft rules be improved?
   No Response

3. Has anything been left out that should be in the rules?
   - There is requirement for personnel records to be available w/i 4 hours and Quality Reports w/i 2 hours of request by the Department. There are no time parameters identified for the facility to provide Medical Records or policies and procedure and since availability has, upon occasion, been an issue and it would be helpful to have a prescribed time line. To be consistent with the draft changes to the OSC rules the time line for each area would be w/i 2 hours. Also, in the OSC rules R9-10-1702 Administration Section B 4 “Ensure that all the policies and procedures are available to all employees and contractors” would be an improvement. Upon occasion when surveyors find that the facility policies and procedures are not available to the Department it means that the employees also do not have access to the P&Ps.