

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

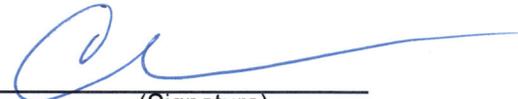
PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 24, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 8, 2012

Date: 5 October 2012

From:

Carol Corr
(KY) Name (Print or type)


(Signature)

KAISER PERMANENTE

Agency, jurisdiction, chapter, company, association, individual, etc.

1800 Harrison Street Oakland CA 94612
Street City State Zip

I/We do not agree with:

The Agency proposed modifications As Submitted on Section No. 1226.4.13.2.1

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

Suggested Revisions to the Text of the Regulations:

1226.4.13.2.1 Medicine preparation room or area. ~~When provided, the medicine preparation room or area shall be under the visual control of the staff.~~ When a medicine preparation room or area is to be used to store self-contained medicine dispensing units, the room shall be designed with adequate space to prepare medicines with the self-contained medicine-dispensing units present.

Reason:

(6) The proposed building standard is unnecessarily ambiguous or vague, in whole or in part.

Recommend striking statement for medication prep room under visual control; The statement is vague and unclear and will be subject to interpretation. It is not consistent with inpatient medication preparation areas. This requirement also does not currently exist for inpatient facilities (1224.14.2.8). To establish one for OSHPD 3 facilities is unreasonable and unfair.