

Study N-300

September 11, 1996

First Supplement to Memorandum 96-65**Administrative Rulemaking: Comments of California Nurses Association**

Attached to this memorandum is a letter from the California Nurses Association commenting on the proposed revisions of the rulemaking procedure set out in Memorandum 96-65. CNA supports the proposed revisions.

Respectfully submitted,

Nathaniel Sterling
Executive Secretary



CALIFORNIA
NURSES
ASSOCIATION

Shaping Tomorrow's Health Care

Law Revision Commission
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VIA US MAIL & FACSIMILE

September 9, 1996

Nathaniel Sterling
Executive Secretary
California Law Revision Commission
4000 Middlefield Road, Room D-1
Palo Alto, CA 94303-4739

RE: Revision of Rulemaking Procedure - Memorandum 96-65

Dear Mr. Sterling:

On behalf of the California Nurses Association (CNA), I would like to thank you for the opportunity to comment on the above referenced matter. In general, the CNA is pleased to hear that the California Law Revision Commission (Commission) has elected to focus on specific problems identified in the existing rulemaking statute, instead of a comprehensive review of the rulemaking process. As highly regulated profession, we find the existing procedure to be of great benefit because it affords a clear and concise procedure to analyze and evaluate a proposed rule/regulation that affects the nursing profession.

With regard to the proposed revisions, we have assessed the amendments/additions to be technical and not substantive, and are supportive of your tentative recommendations. Specifically, we support the suggestions of the Office of Administrative Law (OAL) regarding section 11346.8, and are pleased to know that the Commission has amended this section accordingly. As you know, public input, in the rulemaking process is germane to the APA, thus it is crucial that the public be given the opportunity to provide comment, both oral and written, on new or revised regulations.

In summary, the CNA is pleased with the Commissions proposed legislation. If I may be of any assistance to you, or if you have any questions or comment regarding the above, please feel free to contact me at (916) 446-5019, ext. 15.

Sincerely,

Shannon Sutherland, RN, JD.
Regulatory Policy Specialist

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