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I believe the use of the NFPA 2012 life safety code 101 is a good move forward

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**2. How can the draft rule be improved?**

I believe that there should be a requirement that any person in charge of conducting fire drills and fire safety training i.e. use of fire extinguishers, evacuation procedures, disaster preparedness plans etc, in a nursing home or health care facility, should be required to complete formal training by experts in these fields annually and become certified by the state to assure some semblance of standardized training to facility staff. As it stands today, anyone and in most cases the maintenance supervisor is responsible for the enforcement and interpretation of life safety code rules without regard to having had any formal training or experience in these matters. In most cases the person in charge of these items learns thru on the job training which thru events like Hurricane Katrina and most recently Sandy is the wrong time to learn that at the time of a disaster the person entrusted with the safety of the patients, facility and proper training of staff, all though well meaning, was ill equipped to perform those tasks.

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**3. Has anything been left out that should be in the rule?**

Healthcare facility maintenance staff.

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