

October 28, 2016

Mr. William Anderson

Office of the General Counsel

Department of Public Health

250 Washington Street

Boston, MA 02108

RE: Proposed Amendments to 105 CMR 140.000, *Licensure of Clinics*

Dear Mr. Anderson,

On behalf of the Massachusetts Association of Health Plans (MAHP), which represents 17 member health plans that provide coverage to more than 2.6 million Massachusetts residents, we appreciate the opportunity to submit testimony on the proposed amendments to 105 CMR 140.000, *Licensure of Clinics*. MAHP applauds the Department of Public Health’s (the Department) efforts to review, update and clarify regulations under the Department’s jurisdiction.

Urgent Care Clinics

The proposed amendments to 105 CMR 140.000 would add the definition of “Urgent Care” as a health care delivery model and require licensure of urgent care clinics. In addition, the amendments would, under 105 CMR 140.302 (H), require that these clinics provide a copy of the patient’s record to their primary care physician with the patient’s consent. MAHP supports the licensure of clinics to help ensure standards for quality of care in clinics while encouraging the expansion of this model which can help expand access to care while easing pressure on emergency rooms. We also support the sharing of patient records, upon consent, with the patient’s primary care physicians. This is an important piece in providing continuity of patient care.

Dental Surgery

The proposed amendments to section 105 CMR 140.405 define dental surgery clinics and would require a clinic that performs dental surgical procedures to be licensed to provide surgical services. MAHP supports this change which will allow only those clinics that are licensed to perform dental surgical services.

Mental Health Outreach Programs

The proposed amendments, under 105 CMR 140.560, would remove the cap on mental health outreach visits and eliminate the percentage limit on a mental health clinic’s outreach clients. MAHP supports this change which will provide greater flexibility for clinics providing mental health services in community settings and improve access to mental health services.

MAHP supports the changes outlined above which update regulations to coincide with the current health care environment and will help to ensure high quality care and provide consumer protections for those receiving care at clinics.

Thank you again for the opportunity to provide comments on the proposed amendments to the Hospital Licensure regulations. Please feel free to contact me if you wish to discuss this matter further.

Sincerely,

Lora M. Pellegrini

President & CEO