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| AARP Massachusetts |
| Atrius Health |
| Beth Israel Deaconess Medical Center |
| Beth Israel Deaconess Hospital Needham |
| Beth Israel Deaconess Hospital Plymouth |
| Betsy Lehman Center |
| Beverly Hospital |
| Blue Cross Blue Shield of Massachusetts |
| Boston Children's Hospital |
| Boston Medical Center |
| Brigham & Women's Hospital |
| Cambridge Health Alliance |
| Cape Cod Healthcare System |
| Center for Health Information and Analysis |
| Centers for Medicare and Medicaid Services |
| Commonwealth Care Alliance |
| Connecticut Medical Insurance Company (CMIC Group) |
| Coverys |
| Dana-Farber Cancer Institute |
| Division of Health Professions Licensure |
| Emerson Hospital |
| Fairview Hospital |
| Group Insurance Commission |
| Hallmark Health System |
| Harvard Pilgrim Health Care |
| Harvard School of Public Health |
| Health Care for All |
| Healthcentric Advisors |
| Institute for Healthcare Improvement |
| Lahey Hospital & Medical Center  |
| Lawrence General Hospital |
| Massachusetts Association of Behavioral Health Systems |
| Massachusetts Association of Healthcare Quality |
| Massachusetts Board of Registration in Medicine |
| Massachusetts Board of Registration in Nursing |
| Massachusetts Board of Registration in Pharmacy |
| Massachusetts Department of Mental Health |
| Massachusetts Department of Public Health |
| Massachusetts Executive Office of Elder Affairs |
| Massachusetts General Hospital |
| Massachusetts Health Policy Commission |
| Massachusetts Hospital Association |
| Massachusetts Independent Pharmacists Association |
| Massachusetts Interlocal Insurance Association  |
| Massachusetts Medical Society |
| Massachusetts Nurses Association |
| Massachusetts Pharmacists Association |
| Massachusetts Senior Care Foundation |
| Massachusetts Society of Health-System Pharmacists  |
| MassHealth |
| Medically Induced Trauma Support Services (MITSS) |
| MetroWest Medical Center |
| Milford Regional Medical Center |
| Mount Auburn Hospital |
| National Patient Safety Foundation |
| Organization of Nurse Leaders, MA, RI & NH |
| Partners HealthCare System |
| Professional Liability Foundation  |
| Sturdy Memorial Hospital |
| Telligen |
| The Risk Management Foundation of the Harvard Medical Institutions (CRICO) |
| Tufts Health Plan |
| Tufts Medical Center |
| UMass Memorial Medical Center |

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Re: BORN: 244 CMR 3.00, 6.00, 7.00 and 10.00

October 11, 2016

Catrice C. Williams

Office of the General Counsel

Department of Public Health

250 Washington Street

Boston, Massachusetts 02108

Dear Ms. Williams,

Please consider this letter testimony from the Massachusetts Coalition for the Prevention of Medical Errors on the proposed amendments to the Board of Registration in Nursing to regulations at 244 CMR 3.00, 6.00, 7.00 and 10.00

The Coalition does not have specific comment on the proposed regulations at this time, but would like to highlight an issue related to the process for public comment.

We support the intent of reviewing existing regulations to assess for excessive burden and consistency with legislative requirements. We are concerned, however, that healthcare agencies are now issuing many proposed modifications to regulations for public comment over a short period of time. It can be difficult to thoughtfully review all these proposals, to ascertain the intent and impact of the proposals, and to comment effectively within the available public comment period.

We are concerned that the laudable goals of these regulatory reviews may be at risk, if there is not sufficient time and opportunity for clear communication and analysis among the affected parties.

The Coalition recommends that there should be substantial consultation with all parties after the public comment period to ensure that intent of regulations can be clarified, communication about impacts is clear, complete, and well understood, and opportunities for approaches that meet shared goals among the interested parties are pursued and achieved as much as possible.

We thank you for this opportunity to comment on the proposed regulations.

Sincerely,

Paula Griswold

Executive Director