

October 28, 2016

Via E-Mail: Reg.Testimony@state.ma.us

Ms. Catrice Williams

Office of the General Counsel

Department of Public Health

250 Washington Street

Boston, MA 02108

Re: Clinic Licensure Regulations

Dear Ms. Williams:

I am writing on behalf of Partners HealthCare System to commend and thank the Department of Public Health (the “Department”) for the significant amount of time and effort that it has spent on modernizing the regulations governing the Licensure of Clinics (the “Regulations”).

In particular, we support the addition of a definition of “Urgent Care,” as none exists in the current Regulations. However, we would encourage the Department to consider further clarifications and modifications that we believe would ultimately enhance the proposed rules, while continuing to promote the health and safety of Massachusetts residents. To that end, we would echo the comments that have been submitted by the Massachusetts Health and Hospital Association (“MHA”). (We also support many of the comments that MHA and the Conference of Boston Teaching Hospitals have submitted regarding the Department’s Hospital Licensure Regulations.)

In addition, we would like to point out that neither the current Regulations, nor the proposed amendments, expressly permit the filing of a single Plan Review application and/or a single Licensure application that covers separate projects across multiple locations. As you are certainly aware, the health care sector has grown increasingly complex in recent years, and it is important for providers to have sufficient flexibility to meet the challenges of state and federal health reform. Having a regulatory mechanism that permits or even encourages applicants to combine projects into single Plan Review and/or Licensure applications would greatly benefit both providers and the Department alike, in this regard.

Allowing for the submission of single Plan Review and Licensure applications covering multiple projects – urgent care clinics, for instance – would enable providers to plan for and implement projects in a more strategic, efficient and expeditious fashion. This would not only help to reduce the costs and administrative burden associated with the preparation of multiple applications, but also avoid delays, which often result from separate applications being submitted or reviewed at different points in time.

Likewise, by reviewing single Plan Review and Licensure applications that cover more than one project, the Department would be spared duplicative efforts in reviewing separate applications for individual projects, which taken collectively, represent a single strategic initiative by the applicant. In doing so, the Department will also have a clearer picture as to how an applicant’s proposed projects cohesively fit together.

Therefore, we respectfully request that the Department revise its proposed rules such that they expressly allow for clinic applicants to submit single Plan Review and/or Licensure applications covering multiple projects and locations. Thank you for the opportunity to submit comments on this matter and for your consideration of this request.

Sincerely,



Joseph D. Alviani, Esq.

Vice President for Government Affairs

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