



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
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Tel: 617-624-6000
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To: DPH BSAS Licensed and/or Approved Providers

From: Deirdre Calvert, Director, Bureau of Substance Addiction Services

Date: April 30, 2025

Re: Updates to Notification of Key Personnel Changes to BSAS

As required under 105 CMR 164.035 (E), Licensed and Approved Providers must notify BSAS at least two weeks before a planned change to key personnel or within two business days of an unplanned change to personnel that include these functional titles or individuals performing these functions under a different title assigned by your organization:

Program Director	Access Coordinator
Clinical Supervisor/ Clinical Director/ Senior Clinician	Tobacco Education Coordinator
Medical Director	HIV/AIDS Coordinator
Nursing Director /Supervisor	License Administrator
Executive Director	VG Administrator
President/Chairperson	

For some organizations, a key personnel change may impact multiple BSAS licenses or approvals. In the notification, indicate all BSAS licenses and approval numbers impacted by the key personnel change. Please note that all the marked fields must be completed before the form's submission, including contact information for the reporter and all involved staff.

BSAS no longer accepts Key Personnel Change notifications by email.

To notify BSAS of a Key Personnel Change, please fax the completed form in the link below to the secure eFax: 617-887-8787. (Please reach out to your regional inspector if your fax doesn't appear to go through)

Including a Resume with a Key Personnel Change

For the Clinical Supervisor, Nursing Supervisor, and Medical Director, a resume is required with the key personnel change notification.

Nursing Supervisor is required to be a full-time registered nurse, or a Licensed Practical Nurse (LPN) or other Qualified Health Care Professional provider defined under 105 CMR 164.005 who possesses the skills and supervision experience as determined by program and/or meets the requirements under professional licensure; provided, however that the supervisor shall be educationally prepared at or above the level of the nursing staff under his or her supervision. (see staffing pattern in service setting requirements)

The Medical Director and Clinical Supervisor must meet the requirements for the position as outlined in 105 CMR 164.005 Definitions.

If the key personnel do not meet the qualifications, the program may apply for a waiver **prior to that staff member assuming the role**, pursuant to 105 CMR 164.023: Waivers.

Interim Coverage

If the incoming key personnel are temporary until a permanent replacement is hired, an interim coverage plan is required. An interim coverage plan will suffice when a program identifies a current staff member, who meets the regulatory definition of the key position if applicable, who shall temporarily (no more than 6 months) serve in the capacity of a vacant key regulatory required position. All interim coverage plans are subject to review by BSAS. BSAS may at its discretion request additional information, request that the provider complete a regulatory waiver application, or BSAS at its discretion may determine that an interim coverage plan is insufficient.

To see the BSAS Key Personnel Change Form please see here:

<https://www.mass.gov/doc/key-personnel-change-form/download>