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April 30, 2018

Senator Jason M. Lewis, Senate Chair
Representative Kate Hogan, House Chair
Joint Committee on Public Health
State House
Boston, MA 02133

Re: Letter in opposition to House bills 4112 and 4113, both titled *An Act relative to patient safety and hospital transparency*

Dear Chairs Lewis and Hogan and Members of the Committee:

Associated Industries of Massachusetts (AIM) wishes to be recorded in **opposition** to two mandatory staffing ratio bills currently in your committee: ***House bills 4112*** and ***4113***. AIM has consistently opposed the misguided policy of one-size fits all mandatory staffing ratios and we wish to share our concerns regarding similar proposals before your Committee.

According to a recent study, the proposed bills are projected to add over \$1B the first year of implementation, and \$900M annually thereafter to the cost of health-care delivery in the Commonwealth. Adding hundreds of millions in costs in a short time frame – with no proven effect on patient care or the public’s health – is directly contradictory to our collective goal, of creating lasting cost containment strategies.

Codifying staffing levels for any entity in government regulation is misguided, counterproductive, and costly. Undeniably, the complexity of determining appropriate nurse staffing levels for any health-care institution involves myriad factors and expert judgments that cannot be adequately reflected in regulation. For all employers, appropriate staffing levels are best determined at each respective workplace.

Mandating staffing ratios will also hurt the state’s reform efforts to control health-care costs. Much of the focus in Massachusetts health-care policy is on changing the way we pay for care. Rather than paying doctors and hospitals for the number of patients they see or the tests they order, we have entered an era of reimbursing for patients’ over health outcomes. The premise of payment reform is to incent coordinated, integrated care that leads to healthier patients, less use of services, and improved quality. The proposed bills are projected to increase overall costs of care but provide no demonstrated guarantee of improved quality or health outcomes.

On behalf of our members, AIM urges the Committee to give these two bills an unfavorable report. Thank you for the opportunity to provide these comments. Please call me at (617) 262-1180 if you have any additional questions.

Sincerely,

A handwritten signature in cursive script that reads "Katherine E. Holahan".

Katherine E. Holahan

Vice-President, Government Affairs

Associated Industries of Massachusetts