



**TESTIMONY OF
CONNECTICUT HOSPITAL ASSOCIATION
SUBMITTED TO THE
PUBLIC HEALTH COMMITTEE
Monday, March 13, 2017**

**SB 904, An Act Concerning The Department Of Public Health's
Recommendations Regarding Facilities Guidelines For
Technical Review Of Facility Construction And Renovation**

The Connecticut Hospital Association (CHA) appreciates this opportunity to submit testimony concerning **SB 904, An Act Concerning the Department of Public Health's Recommendations Regarding Facilities Guidelines For Technical Review Of Facility Construction And Renovation**. CHA has concerns about this bill.

Before commenting on the bill, it's important to point out that Connecticut hospitals provide high quality care for everyone, regardless of ability to pay. Connecticut hospitals are finding innovative solutions to integrate and coordinate care to better serve patients and communities, as well as achieve health equity. These dynamic, complex organizations are working to build a healthier Connecticut. That means building a healthy economy, community, and healthcare system. By investing in the future of Connecticut's healthcare and hospitals, rather than continuing to cut away at them, we will strengthen our economy, put communities to work, and deliver affordable care that Connecticut families deserve.

CHA and the Department of Public Health have been engaged in ongoing efforts to improve the effectiveness and efficiency of the plan review process conducted by the Department. We look forward to continuing our work with the Department to achieve improvements in this area.

Construction and renovation in Connecticut hospitals is becoming increasingly complex and intricate, involving the incorporation of the latest electronic and digital technology with state-of-the-art medical devices and equipment, often housed in buildings that must be constantly and accurately regulated with respect to sterility, temperature, humidity, and air flow to facilitate the delivery of healthcare by the licensed clinicians and to ensure the quality of healthcare provided to patients. These activities are subject to an array of statutes, regulations, guidelines, and protocols.

CHA asserts that the Commissioner of the Department of Public Health has sufficient discretion under current law to establish the guidelines applicable to technical review of healthcare facility construction and renovation in Connecticut. We question the need to establish a statutory requirement to comply with guidelines established by organizations that operate independently from and are not subject to direction or input from the Department.

The bill would require healthcare providers to comply with nationally established guidelines for healthcare construction as identified by the commissioner. The discretion afforded to the commissioner under the statute to determine whether a set of guidelines is in fact established as a national standard is absolute in this regard. CHA believes that the commissioner should be amenable to accommodating all applicable nationally established guidelines for healthcare facility construction and renovation.

The bill should also specify that the scope and applicability of the technical review to be conducted by the Department on a project shall be limited only to those matters addressed in the nationally established guidelines posted by the commissioner.

Finally, CHA believes that if adopted, the statute should specify that any guidelines posted by the Department shall include an effective date, and that the guidelines applicable to the technical review of any project shall be those that were posted on the date the project plan was submitted to the Department. This will ensure that the goal of affording providers with guidance as to the standards for technical review of a project is known at the time a project is submitted for review.

Thank you for your consideration of our position. For additional information, contact CHA Government Relations at (203) 294-7310.