

**Associated Industries of Massachusetts
Greater Boston Chamber of Commerce
Massachusetts Business Roundtable
Massachusetts Taxpayers Foundation**

July 11, 2006

To: Members of the Massachusetts Senate

Re: Business Community Opposition to H.4988

Dear Senator:

Associated Industries of Massachusetts, the Greater Boston Chamber of Commerce, the Massachusetts Business Roundtable and the Massachusetts Taxpayers Foundation oppose H.4988, which would require the Department of Public Health to establish specific nurse staffing ratios for the Commonwealth's hospitals.

The employer community believes hospitals should not be micro-managed by mandating staffing levels either through General Law or, by extension, through state agency regulation. The bill before you, while avoiding the use of a general law, would put the determination for registered nurse staffing levels in the hands of the Department of Public Health.

We oppose this legislation from a strongly held belief that codifying in government regulation staffing levels for any entity is ill advised, counterproductive and costly. It is undeniable that the complexity of determining appropriate nurse staffing levels for any health care institution involve myriad factors and expert judgments that cannot be adequately reduced to regulation.

We believe that the most appropriate parties with the knowledge, skill and experience to make those staffing decisions are not state regulatory agencies but hospital managers who in every instance are responsible for providing competent care for their patients. The provisions in the legislation related to hardship and to the Department's inability to create certain regulations are a testament to the complexity and difficulty in pursuing a regulatory approach mandating nursing staff levels, which only confirms why such an approach is the wrong path and why this bill should not be adopted.

Having recently passed a landmark health insurance reform bill, members of the Senate surely realize that the issue of adequate health care coverage is a complex and costly one. We urge you to reject H.4988.

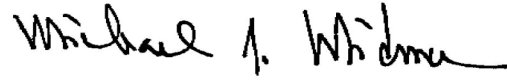
Sincerely,

Richard C. Lord
President and CEO
Associated Industries of Massachusetts

Paul Guzzi
President and CEO
Greater Boston Chamber of Commerce



Alan G. Macdonald
Executive Director
Massachusetts Business Roundtable



Michael J. Widmer
President
Massachusetts Taxpayers Foundation, Inc.