Testimony of the
Urgent Care Association of America
before the
Public Health Committee
March 5, 2018
S.B. 303 AN ACT CONCERNING URGENT CARE CENTERS.

Senator Gerratana, Senator Somers, Representative Steinberg, and distinguished members of the Public Health Committee:

The Urgent Care Association of America (UCAOA) commends the Committee for its interest in establishing a definition for urgent care centers, and we are pleased to have this opportunity to provide testimony on the definition of urgent care centers as contained in S.B. 303.

Since the early 1980s, urgent care centers have been providing care to Americans throughout the United States. Today there are an estimated 8,100 urgent care centers in the United States. According to UCAOA’s most recent benchmarking survey, urgent care centers provide more than 88 million patient visits per year making these patient-centric destinations a dominant point of service for health care for millions of Americans.

The definition of urgent care center as contained in S.B. 303 lacks the specificity that would allow regulators, insurers and consumers to adequately distinguish between an urgent care center, a physician’s office with extended hours and retail walk-in clinics. We strongly urge you to modify and adopt a definition of urgent care center that more clearly characterizes the scope of urgent care and differentiates between other sites of service. A definition that provides a clearer delineation between urgent care centers and other sites of service is particularly important because S.B. 303 requires that “each outpatient clinic, urgent care center and freestanding emergency department shall display conspicuous signage on the outside of its facility that clearly indicates that it is an outpatient clinic, urgent care center or freestanding emergency department.” Under the definition of urgent care center and the signage requirement in S.B. 303, it is anticipated that the lines between an urgent care center and retail walk-in clinic would be blurred, leading to consumer confusion and potentially misleading advertising.

The UCAOA offers the following definition of urgent care center for the Committee’s consideration:

An urgent care center is a medical clinic with expanded hours that is specially equipped to diagnose and treat a broad spectrum of non-life and limb threatening illnesses and injuries. Urgent care centers are enhanced by onsite radiology and laboratory services and operate in a location distinct from a freestanding or hospital-based emergency department. Care is rendered under the medical direction of an allopathic or osteopathic physician. Urgent care centers accept unscheduled, walk-in patients seeking medical attention during all posted hours of operation.

UCAOA respectfully requests that the Committee abandon the definition of urgent care center as proposed in SB 303 and, instead, support the definition of urgent care center as suggested above. Furthermore, a clearer delineation of a urgent care center and a retail walk-in center is consistent with Medicare. By place of service (POS) code, Medicare differentiates between a walk-in retail health clinic and an urgent care facility. Medicare POS codes are as follows:
**POS 17 Walk-in Retail Health Clinic**
A walk-in health clinic, other than an office, urgent care facility, pharmacy or independent clinic and not described by any other Place of Service code, that is located within a retail operation and provides, on an ambulatory basis, preventive and primary care services. 
Location, distinct from a hospital emergency room, an office, or a clinic, whose purpose is to diagnose and treat illness or injury for unscheduled, ambulatory patients seeking immediate medical attention.

**POS 20 Urgent Care Facility**
Location, distinct from a hospital emergency room, an office, or a clinic, whose purpose is to diagnose and treat illness or injury for unscheduled, ambulatory patients seeking immediate medical attention.

Thank you for your consideration of UCAOA’s position. Should you require additional information, please contact Laurel Stoimenoff, CEO, at lstoimenoff@ucoa.org.