



August 22, 2022

Washington State Department of Health  
[facilitiesfeedback@doh.wa.gov](mailto:facilitiesfeedback@doh.wa.gov)  
101 Israel Road SE  
Tumwater, WA 98501

**RE: Proposed Uniform Facility Enforcement Framework**

Dear Christie Spice:

On behalf of the Washington State Hospital Association (WSHA), thank you for the opportunity to provide feedback on the Uniform Facility Enforcement Framework draft bill language. WSHA represents more than 100 hospitals and health systems in our state, and our hospital members range from large statewide health care delivery systems to small rural hospitals that are the only health care safety net serving rural, remote communities. We offer the following recommendations for the draft bill language.

**Prohibit Multiple Enforcement Actions for the Same Violations**

Many facilities, including hospitals, hold multiple license types. Hospitals are already subject to enforcement actions and fines under RCW 70.41.130 or 71.12.710. This proposed bill could lead to duplicative fines and enforcement actions for the same or similar violations under each license a facility holds. We do not believe the goal of the legislature in directing the Department of Health (DOH) to draft this bill was to punish facilities holding more license types most severely. Because of this, we recommend adding a new section to RCW 43.70 as follows:

**NEW SECTION Sec. X.** A new section is added to chapter 43.70 RCW to read as follows:

If the department takes enforcement action against a license holder as authorized under this act, RCW 70.41.130, or RCW 71.12.710, the department may not impose additional enforcement actions against that license holder based on the same or similar violation under a different chapter of this act, RCW 70.41.130, or RCW 71.12.710. Nothing in this section shall limit the department from taking enforcement action for separate violations.

Thank you again for the opportunity to comment on the Commission's proposed bill language. Should you have additional questions on WSHA's recommendations, please contact Cara Helmer via email at [CaraH@wsha.org](mailto:CaraH@wsha.org).

Sincerely,

A handwritten signature in black ink that reads "Cara Helmer".

Cara Helmer  
Policy Director, Legal Affairs  
Washington State Hospital Association