



May 4, 2018

Ms. Marguerite Salazar  
Executive Director  
Colorado Department of Regulatory Agencies  
1560 Broadway, Suite 110  
Denver, CO 80202

Dear Ms. Salazar:

The Urgent Care Association of America (UCAOA) welcomes the opportunity to comment on proposed network adequacy standards and reporting requirements for Affordable Care Act-compliant health benefit plans that are effective July 1, 2018. The UCAOA specifically offers its recommendation on the definition of an urgent care facility.

Since the early 1980s, urgent care centers have been providing care to Americans throughout the United States. Today there are an estimated 8,200 urgent care centers in the United States. According to UCAOA's most recent benchmarking survey, urgent care centers provide more than 100 million patient visits per year making these patient-centric destinations a dominant point of service for health care for millions of Americans.

The UCAOA believes that the definition of urgent care facility or center should contain enough specificity to allow regulators, insurers and consumers to adequately distinguish between an urgent care center, a physician's office with extended hours, retail walk-in clinics, free-standing emergency departments and hospital emergency departments. We therefore offer the following recommendation for the definition of an urgent care facility that more clearly characterizes the scope of urgent care and differentiates between other sites of service.

*"Urgent care facility" means, for the purposes of this regulation, 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. An urgent care facility does not have the facilities to handle emergency conditions, as defined under emergency services. Urgent care facilities are enhanced by onsite radiology and laboratory services and are 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 asks that you amend the current definition of urgent care facility, with proposed amendments, under Regulation 4-2-53 with the above recommended definition. Should you have any questions or require additional information on this or other matters pertaining to urgent care centers, please contact Camille Bonta, UCAOA policy consultant, at [cbonta@summithealthconsulting.com](mailto:cbonta@summithealthconsulting.com) or (202) 320-3658.

Sincerely,

A handwritten signature in black ink that reads "Laurel Stoimenoff".

Laurel Stoimenoff, PT, CHC  
CEO  
Urgent Care Association of America