



**Rhode Island Partnership
for Home Care**

Advancing quality healthcare at home

September 10, 2025

VIA E-MAIL AND USPS MAIL: zachary.garceau@health.ri.gov

Zachary Garceau
Chief of Program Development
Department of Health
State of Rhode Island
3 Capitol Hill
Providence, RI 02903

Re: Proposed Amendments for 216-RICR-40-10-11 Applicable to Hospice and Palliative Care Services and Supports

Dear Mr. Garceau,

On behalf of the Rhode Island Partnership for Home Care (The Partnership), which represents licensed hospice providers, I submit the following public comment for consideration related to the proposed amendments issued by the Rhode Island Department of Health (DoH) on September 8, 2025.

We request that the following definition within 216-RICR-40-10-11.3(A)(20) be revised to more accurately and positively explain the importance of palliative care offered to a patient and emphasizes the patient's liberties and options while accepting palliative care services and supports:

"Palliative care" means specialized medical care that focuses on relieving the symptoms, pain and stress associated with serious, chronic or life-threatening illnesses. It shall have patient and family-centered goals and may be provided alongside curative or life-prolonging treatments. Services and supports shall be offered regardless of the patient's age or stage of illness. Palliative care aims to improve quality of life through a holistic, multidisciplinary approach that addresses individual physical, intellectual, emotional, spiritual and psychosocial needs and facilitates patient autonomy, access to information and prioritizes patient's voice and choices.

Because the definition within the current regulation varies from its corresponding statutory definition within G.L. § 23-89-3(a)(3), we believe that it is within the authority of DoH to codify a revised definition for palliative care, so long as the regulatory definition neither conflicts or significantly varies from the intent of the statutory definition as prescribed within *"The Rhode Island Palliative Care and Quality of Life Act of 2013"* or DoH's statutory authority pursuant to G.L. § 23-17-2(12) related to *"Licensing of Healthcare Facilities"*.

The Partnership otherwise supports the proposed amendments to this regulation and hopes that DoH will adequately address our aforementioned concern related to the definition of palliative care within this regulation. If you have any questions regarding the content of this letter, please contact me directly at (401) 351-1010 or director@riphc.org.

Sincerely,

Nicholas Oliver, MPA, CAE
Executive Director