



May 7, 2025

Representative Marvin L. Abney  
Chair  
House Finance Committee  
State House  
82 Smith Street  
Providence, RI 02903

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**David A. Balasco**  
*Vice President*

**RE: H-5076 - Governor's Budget Amendment 16 to Article 10 – Certificate of Need**

Dear Chairman Abney:

Brown University Health ("Brown Health") appreciates the opportunity to provide comments on the Governor's proposed amendment ("Amendment 16") to the Governor's proposed budget, Article 10, which amends the certificate of need ("CON") statute. As we stated in our prior comments to the Governor's original budget article, Article 10, Brown Health supports efforts to streamline and limit the CON process, reduce the administrative burdens and allow hospitals the flexibilities to respond to the dynamic healthcare environment to meet the needs of our patients. Since its enactment, the statute has been continuously amended resulting in increases in restrictions, costs and burdens on applicants, especially hospitals.

First, we applaud the Governor for identifying the issue of the one-for-one equipment replacement and addressing it through his Amendment 16. This was not only an issue that we raised with this Committee but also with the Governor's office, after which we understood that alteration to be unintended. Accordingly, we appreciate the openness with which the Governor's office listened to and addressed these concerns.

The second change in Amendment 16 further changes the definition of "new healthcare equipment" by adding back into statute magnetic resonance imaging (MRI) and computerized axial tomography (CT) to the CON process. Brown Health believes that Article 10 at the very least should only include linear accelerators and positron emission tomography (PET)s and reintroducing more to the CON process reinforces administrative burdens and complications to the healthcare system.

Finally, although not a part of Amendment 16, Brown Health also incorporates its prior comments regarding application fees and the review period from its letter dated February 26, 2025, and submitted to this Committee.

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Brown Health again appreciates the opportunity to provide our comments on Amendment 16 and looks forward to working with this Committee as it considers these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Balasco". The signature is fluid and cursive, with the first name "David" being more prominent.

David A. Balasco, Esq.  
Vice President, Government Relations