

May 28, 2026

The Honorable Susan R. Donovan, Chair
House Committee on Health & Human Services
Rhode Island State House
Providence, RI 02903

RE: Opposition to H8500 – Healthcare Entity Fiscal Integrity, Transparency, and Accountability Act

Dear Chair Donovan and Members of the Committee,

On behalf of the 44 member organizations of the Rhode Island Coalition for Children and Families (RICCF), we respectfully submit this testimony in opposition to H8500.

RICCF represents community-based providers and advocacy organizations that deliver behavioral health treatment, child welfare services, residential care, prevention services, educational supports, and other essential programs for Rhode Island's children and families. Many of our members already operate within highly regulated environments and are subject to extensive fiscal, operational, and programmatic oversight from multiple state and federal agencies.

We appreciate the intent behind H8500 and support the broader goals of fiscal integrity, transparency, and accountability within Rhode Island's healthcare system. However, we are concerned that the legislation creates a new and expansive reporting and oversight structure without sufficient consideration of the administrative burden, duplication of existing oversight mechanisms, and potential unintended consequences for community-based providers already operating under significant financial strain.

The organizations impacted by this legislation already submit substantial financial documentation through existing state and federal processes, including audited financial statements, Uniform Reports, Medicaid cost reporting, licensing reviews, federal grant compliance, and IRS Form 990 filings. State agencies currently have broad authority to review financial conditions, monitor provider stability, and require corrective action when concerns arise.

We recognize that the state has an interest in ensuring providers are financially healthy, but this is the work of their independent boards of directors. H8500 risks encroaching on their organizational independence and would add a layer of additional quarterly reporting requirements and broad discretionary oversight authority onto providers that are already managing workforce shortages, rising insurance costs, increasing Medicaid compliance obligations, and significant operational pressures.

We are also concerned about the broad authority granted to EOHHS to make findings of "financial risk" or "imminent financial jeopardy" based on criteria that would later be established through regulation. While provider stability is critically important, these determinations could create uncertainty for



organizations, employees, lenders, and philanthropic partners without clear statutory standards or protections regarding how findings would be interpreted, communicated, or resolved.

Additionally, the legislation appears to contemplate a level of centralized financial oversight that may not adequately account for the complexity and diversity of Rhode Island's provider landscape. Community-based nonprofit organizations are not interchangeable entities. Many provide highly specialized services for children and families that cannot easily be replicated if organizations are destabilized by additional administrative mandates or public findings regarding financial risk.

At a time when Rhode Island is already experiencing significant challenges related to workforce shortages, behavioral health access, and provider sustainability, we believe the state should prioritize collaborative stabilization strategies and targeted investments in provider capacity rather than imposing new unfunded reporting structures and regulatory burdens.

RICCF supports transparency and accountability and would welcome continued conversations regarding reasonable approaches to monitoring provider stability and protecting access to care. However, we respectfully urge the Committee to carefully consider whether H8500, as drafted, may unintentionally increase administrative costs and operational instability for the very organizations the state relies upon to deliver essential services.

For these reasons, RICCF respectfully opposes H8500. Thank you for your consideration and continued commitment to Rhode Island's children and families.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tanja Kubas-Meyer".

Tanja Kubas-Meyer
Executive Director
Rhode Island Coalition for Children and Families