

Good afternoon,

Thank you for the opportunity to provide testimony on S.189, an act relating to establishing a process for reducing or eliminating hospital services. During my testimony on Thursday April 2, 2026, I provided several suggested edits to S.189. I have provided written testimony below that reflects those suggested edits:

- Section 1: Under subsection (b), provide clarity on the timing for AHS's review of a hospital's notice of intent to reduce or eliminate a service. The current language is unclear if AHS's nonbinding recommendation is meant to inform a hospital's decision. It seems implied but the timing is unclear. There is also not a clear timeline for how quickly and when AHS must complete the analysis of the proposed reduction or elimination.
- Section 2: Clarify that the Board's budget review shall be after receipt of the hospital's notice as well as AHS's analysis:
 - "Upon receipt of AHS' nonbinding recommendation and notification from a hospital and pursuant to subsection 9405d(b) of this title that the hospital intends to reduce or eliminate a service following its completion of the process set forth in subsection 9405d(a)..."

I also testified to removal of (e)(3) in Section 2, related to collaboration with DFR.

Thank you and GMCB is happy to provide any additional testimony on this bill as needed.

Emily Brown, JD
Executive Director
[Green Mountain Care Board](#)
112 State Street, 5th Floor
Montpelier, VT 05633-3601
(802) 505-1708