



Date: April 2, 2025

To: Chair Lyons & Members of Senate Health & Welfare Committee

From: Susan Ridzon, HealthFirst Executive Director, sr@vermonthhealthfirst.org

Re: H. 96 An act relating to increasing the monetary thresholds for certificates of need

Thank you for the opportunity to testify on Certificate of Need Reform bill H.96 under consideration by your committee. For the record, I'm Susan Ridzon, Executive Director of HealthFirst, an independent practice association representing approximately 215 clinicians working at 62 physician-owned primary care and specialty care practices located across Vermont.

HealthFirst **fully supports** H.96 for the following reasons:

- Encourages development of free-standing centers that will increase patient access to lower cost options for healthcare.
- Thresholds are the same for non-hospital and hospital entities, helping to level the playing field for those who want to bring cost-effective healthcare options to Vermont but have fewer resources to navigate the CON requirement.
- Applies the higher thresholds to entities such as ambulatory surgery centers (ASC) instead of automatically subjecting them to CON process regardless of project cost.

Suggested minor changes/clarifications:

- We agree with Laura Beliveau's suggestion that the language related to ASCs be clarified to better reflect the intent of having ASCs subject to the same thresholds as other entities, i.e. \$10M /\$5M /\$3M for construction, equipment, operating budget, respectively.
- Consider changing the effective date to upon passage instead of July 1st as there appears to be no reason for the delay.
- Lastly, we suggest that page 5, line 11-12 of the bill be amended as follows to ensure thresholds are regularly adjusted: "The Board ~~may~~ shall periodically adjust the monetary jurisdictional thresholds contained in this section."

As I testified in House Health Care committee^{1,2}, 50 years of data show that Certificate of Needs laws are associated with worse access, higher costs, and lower quality. Vermont has serious cost and access issues, and quality is worsening. Passing H.96 is low hanging fruit that can help to address Vermont's most pressing issues. We ask for the Committee's support in passing H.96 as passed by the House, with consideration of our suggested changes. We thank you for your work on this issue.

¹[https://legislature.vermont.gov/Documents/2026/Workgroups/House%20Health%20Care/Bills/H.96/Witness%20Documents/H.96~Susan%20Ridzon~Certificate%20of%20Need%20\(CON\)%20Reform%20H.96~2-14-2025.pdf](https://legislature.vermont.gov/Documents/2026/Workgroups/House%20Health%20Care/Bills/H.96/Witness%20Documents/H.96~Susan%20Ridzon~Certificate%20of%20Need%20(CON)%20Reform%20H.96~2-14-2025.pdf)

² <https://youtu.be/4C35dYPvRgc>