



RI Department of Health  
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TTY: 771  
[www.health.ri.gov](http://www.health.ri.gov)

January 23, 2024

The Honorable Evan P. Shanley  
Chair, Committee on House State Government and Elections  
State House  
82 Smith St.  
Providence, RI 02903

**RE: H 7178 – An Act Relating to State Affairs and Government – Administrative Procedures**

Dear Chair Shanley:

Please accept this letter of opposition regarding H 7178, legislation that would require that all State agencies' final rules, promulgated under the *Administrative Procedures Act*, be approved by General Assembly action, but in no case later than December 31 of the year it is promulgated, before it can become effective.

The Rhode Island Department of Health (RIDOH) is responsible for promulgating more than 100 regulations and is concerned about the impact this bill will have on the operation of the department and the healthcare system as a whole. Many regulations are needed to guide the conduct and standards of care within our healthcare system. These regulations many times require swift actions. RIDOH regulations cannot and should not be dependent upon General Assembly action.

The current Office of Regulatory Reform process is designed to offer strong requirements for ensuring maximum levels of public participation. As part of this process, members of the General Assembly are both invited and welcome to provide input on all proposed regulations. The current State-mandated process serves the public's interests well. We are happy to answer any questions the members of the Committee or the sponsors may have about the regulatory process from RIDOH's perspective. Thank you for the opportunity to comment on this proposed legislation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Utpala Bandy" followed by a flourish and the word "for".

Utpala Bandy, MD, MPH  
Interim Director

CC: The Honorable Members of the House State Government and Elections  
The Honorable Arthur J. Corvese  
Nicole McCarty, Esquire, Chief Legal Counsel to the Speaker of the House  
Lynne Urbani, Policy Director

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