



new jersey chapter
metropolitan philadelphia chapter

CERTIFICATE OF ATTENDANCE

*49th ANNUAL INSTITUTE
October 29th to 31st, 2025*

Thursday, October 30th, 1:00pm to 1:50pm
Brighton Ballroom 2

**A Discussion of the New Jersey Supreme Court's Decision in
Englewood Hospital & Medical Center v. State of New Jersey: Is
NJ's Mandate that Hospitals Provide Care to Any Patient
Regardless of Ability to Pay an Unconstitutional Taking of
Hospital Property**

Presenter(s):

Paul Croce & James Robertson, Greenbaum Rowe Smith & Davis LLP

ATTENDEE: _____

Lewis D. Bivona, Jr.

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NJ HFMA CPE Coordinator

*Based on our understanding of the New Jersey State Board of Accountancy's continuing education requirements, Sponsor Number 185, this course qualifies for **One (1)** continuing professional education credit in **Specialized Knowledge**. For Pennsylvania licenses, the Sponsor Number is PX748, this course qualifies for **One (1)** continuing professional education credit in **Professional Development**.