



March 10, 2025

Committee on Corporations
State of Rhode Island General Assembly

Re: Support HB 5569 Relating to Pet Insurance with Amendment

Dear Representative Solomon and Committee Members:

Good afternoon. Thank you for the opportunity to provide testimony today on behalf of the North American Pet Health Insurance Association (NAPHIA) in support of HB 5569 and to recommend one minor modification to the bill. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

NAPHIA is the voice and vibrant forum for a trusted and growing pet insurance industry in the U.S. and Canada. NAPHIA members comprise the overwhelming majority of pet health insurance providers in North America. As the trade association for providers of highly valued pet health insurance related products and services, we are relied upon by pet families and veterinary teams to facilitate optimal pet healthcare and significantly improve pet health outcomes.

HB 5569 builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both consumers and the industry will benefit from a consistent nationwide approach for pet insurance that ensures clear and consistent regulation of pet insurance products.

Specifically, the proposed legislation:

- allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies;
- clarifies permissible and prohibited sales practices, and the applicability of the state’s unfair trade practices law;
- requires important consumer disclosures; and
- establishes uniform meanings of key terms for better understandability.

NAPHIA supports the bill as drafted and respectfully requests the following change from the introduced version of HB 5569, which will make this bill even more consumer friendly:

- Section 27-83-5. Policy conditions. – On page 6, line 8 the bill still states “as such policy effectuation date is clearly disclosed and no premium is charged...” this sentence needs to be amended to replace charged with earned and should read " no premium *is earned*"

With this change, the provision would be the same as the version of the bill that passed the Assembly last year.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the proposed revision, the legislation will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance. This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market.

The language before you today has been thoroughly vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and ensures the marketplace operates fairly. The legislation is based on the Pet Insurance Model Act adopted by the National Association of Insurance Commissioners (NAIC). Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

NAPHIA respectfully requests that you approve this important legislation with the requested amendments. Thank you for your consideration of NAPHIA's views.

Very truly yours,

A handwritten signature in blue ink, appearing to read "John P. Fielding".

John P. Fielding
Fielding Strategies, LLC