



April 13, 2026

The Honorable Joseph J. Solomon, Jr.
Chair, House Corporations Committee
82 Smith St
Providence, RI 02903

RE: House Bill 7722 – Relating to Insurance – Accident and Sickness Insurance Policies – Dental Insurance Coverage – OPPOSE

Dear Chair Solomon, Vice Chairs O’Brien and Caldwell, and Members of the Committee,

On behalf of the National Association of Dental Plans (NADP)¹, and the American Council of Life Insurers (ACLI)², we appreciate the opportunity to provide comments in opposition to H. 7722, which would undermine the structure and value of dental networks, and could lead to higher out-of-pocket expenses for patients while threatening the accessibility and affordability of dental care in Rhode Island.

Dental networks are essential to delivering affordable, high-quality oral health care. Networks function through negotiated reimbursement rates that reflect a mutual benefit between plans and participating dentists. In-network providers accept discounted rates and agree to limit patient charges in exchange for patient volume and simplified administration. This contracting framework helps ensure that dental coverage remains accessible and affordable for patients and employers.

H. 7722 would erode these incentives by requiring dental plans to reimburse non-participating providers at the highest reimbursement rate paid to any participating provider category for the same service. Such a policy would allow out-of-network dentists to receive the most favorable in-network reimbursement levels without agreeing to the contractual obligations that participating providers accept. This requirement would destabilize the

¹ NADP is the largest non-profit trade association focused exclusively on the dental benefits industry. NADP’s members provide dental HMO, dental PPO, dental indemnity and discount dental products to more than 200 million Americans with dental benefits. Our members include the entire spectrum of dental carriers: companies that provide both medical and dental coverage, companies that provide only dental coverage, major national carriers, regional, and single state companies, as well as companies organized as non-profit plans.

² The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI’s member companies are dedicated to protecting consumers’ financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI’s 275 member companies represent 93 percent of industry assets in the United States.

contracting framework between providers and plans and expose patients to significantly higher charges above in-network rates.

Providers choose to participate in networks because they value the stability, patient access, and streamlined administration that come with participation. If out-of-network providers can receive the same, or higher, reimbursement than participating dentists while retaining the ability to charge patients additional amounts, the incentive to enter or remain in network is significantly weakened. Over time, this dynamic would erode network participation, leaving patients with fewer in-network options, higher costs, and reduced access to care. The resulting decline in participation would also undermine the cost-control mechanisms that help keep premiums and patient expenses affordable.

Access to dental care through insurance is essential for maintaining oral health through routine preventive treatment. Dental patients are highly price sensitive, and when faced with higher costs or fewer in-network options, they are more likely to postpone or forgo routine care. Delayed care increases the risk of more complex and costly oral health problems over time, ultimately leading to poorer oral and overall health outcomes.

For these reasons, we respectfully oppose H. 7722 and urge the Committee not to advance the bill in its current form. We appreciate your consideration and welcome the opportunity to provide additional information or support your deliberations in any way.

Respectfully submitted,



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