



March 18, 2025

The Honorable Susan R. Donovan, Chairwoman
House Health and Human Services Committee
State House
Providence, RI 02903

Re: H.5253, An Act Relating to Insurance – Autism Spectrum Disorders
H.5432, An Act Relating to Insurance – Insurance Coverage for Mental Illness and Substance Use Disorders
H.5850, An Act Relating to Insurance – Insurance Coverage for Mental Illness and Substance Use Disorders
H.5854, An Act Relating to Businesses and Professions – Pharmacies
H.6061, An Act Relating to Insurance – Insurance Coverage for Mental Illness and Substance Use Disorders

Dear Chairwoman Donovan,

The undersigned members of the Rhode Island Business Coalition have concerns relative to the passage of the above-mentioned health care bills that would enact additional health insurance mandates and restrictions on insurer cost containment initiatives.

For the past several years, the Coalition has expressed concerns on bills such as these because they increase the number of new health insurance mandated benefits and costs to Rhode Island's health system. These costs are disproportionately borne by small employers, their employees as well as Rhode Islanders who purchase coverage through the individual market, who are often least able to afford the premium increases. The reason for this is larger employers who self-insure their health benefit plans are not subject to state health insurance mandates.

Affordability is a significant concern for Rhode Island small employers. An analysis of National Association of Insurance Commissioners (NAIC) data by the Rhode Island Business Group on Health, showed the Rhode Island small employer market has seen a 53 percent drop in covered lives from 2012 to 2022. A recent analysis of the Rhode Island health insurance market by Oliver Wyman conducted for the Office of the Health Insurance Commissioner (OHIC) showed significant decreases in membership in both the large and small group fully insured markets since 2020. The large group market experienced the largest overall decrease of 18.4% while small group saw an 11.1% during this period.

The Coalition believes that new proposed health insurance mandates should be accompanied by a cost-benefit analysis conducted by OHIC. The bills outlined below could be studied to provide the legislature with an analysis of the efficacy of new mandates while also providing a cost impact.

The Rhode Island Business Coalition represents 50 industries and 6,280 businesses that employ 231,200 people throughout Rhode Island.

- H.5253 removes the age restriction for benefits coverage and requires, for health insurance policies issued or renewed on or after January 1, 2026, that coverage must include reimbursement for applied behavior analysis provider services.
- H.5432 prohibits health insurance providers from requiring preauthorization for in- network mental health or substance use disorder services.
- H.5850 requires every individual or group health insurance plan on or after January 1, 2026, that provides benefits to reimburse child service providers for therapy services offered through EOHHS certified Kids Connect/Therapeutic Services.
- H.5854 adds new sections that set forth conditions for pharmacists to prescribe tobacco cessation drug therapies, including education approved by state board of pharmacy. The cessation therapies to be covered by all health insurance carriers on or after January 1, 2026.
- H.6061 amends the provisions for insurance coverage of mental health, mental illness, and substance use disorders.

While we appreciate the desire to assist individuals facing difficult health challenges, we do not know the number of individuals that would be covered under all these new programs, the costs associated with the benefits, and the potential impacts on the availability of services to groups already covered should any of these mandates pass into law. Approaching healthcare and health insurance policy in a piecemeal fashion leads to increased costs for businesses and individual subscribers. For many years, the Rhode Island General Assembly has passed legislation adding mandated health insurance benefits that have increased the cost of individual, small and large group health insurance premiums across the state.

As mentioned above, the Rhode Island Business Coalition urges the General Assembly to create a mandated benefits review committee, comprised of experts from various stakeholder groups. That group could then evaluate all the submitted proposals and provide meaningful data to assist the General Assembly in its health care policy deliberations.

Sincerely,

Associated Builders and Contractors – Rhode Island

National Federation of Independent Business

Rhode Island Business Group on Health

Rhode Island Manufacturers Association

Rhode Island Staffing Association

Small Business Economic Summit Regulations Committee

cc. House Health and Human Services Committee members