

March 3, 2026

The Honorable Susan Donovan, Chair, House Committee on Health and Human Services  
Via email to: [HouseHealthandHumanServices@rilegislature.gov](mailto:HouseHealthandHumanServices@rilegislature.gov)

**Re: House Bill 7537, Accident and Sickness Insurance Policies – Scalp Cooling**

Dear Chairwoman Donovan and Members of the Committee:

On behalf of Blue Cross & Blue Shield of Rhode Island (Blue Cross), I am writing to share concerns with this legislation relating to mandating coverage of scalp cooling services.

We share the goal of ensuring that individuals and families have meaningful access to appropriate medical care. We continuously review coverage and plan design to best serve our members. **For example, Blue Cross covers scalp cooling services related to the administration of chemotherapy.** However, we respectfully urge caution against new or expanded health insurance mandates that would increase costs for employers, workers, and taxpayers. Additionally, establishing a new mandate, to separately cover scalp cooling services, may subject patients to additional cost-sharing.

**Rhode Island residents and businesses are already facing a health insurance cost crisis, and new benefit mandates would only drive costs higher.** Mandates do not reduce the cost of care or coverage—they drive up the premiums for employers and workers. Many Rhode islanders are struggling to maintain coverage, and each new mandate increases the risk of reducing benefits, freezing wages, or dropping coverage altogether. At a time when premiums are already rising sharply, expanding mandated benefits would further strain families and undermine the stability of the fully insured market.

**State leaders have repeatedly warned against policies that drive up health insurance costs.** The Health Insurance Commissioner emphasized that rising health insurance costs place enormous pressure on employers and consumers. The Commissioner found rising premiums result in Rhode Islanders having less income to spend on housing, education, and other necessities.<sup>1</sup> The Governor cautioned that Rhode Islanders cannot afford higher premiums. He called for a temporary moratorium on new unfunded health insurance mandates, so as to not unintentionally raise premiums.<sup>2</sup>

**Federal rules impose a liability on states to defray the costs of new or expanded mandates.** Under the Affordable Care Act and implementing federal regulations (45 C.F.R. § 155.170), the state may be liable to defray the cost of new health insurance benefit mandates,

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<sup>1</sup> OHIC “[More Evidence That Rising Health Care Costs Crowd Out Wage Growth](#)”

<sup>2</sup> [Governor McKee letter to Office of the Health Insurance Commissioner, September 15, 2025](#)

shifting those costs directly to state taxpayers. Recent regulatory notices suggest more active oversight of state compliance with this rule.<sup>3</sup>

In this time of tight budgets, cost concerns across the economy, and rising health care costs, preserving access to coverage and protecting jobs requires lawmakers to resist new or expanded mandates.

Respectfully,



**Richard Glucksman**

Assistant General Counsel, Legal & Government Relations

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<sup>3</sup> 90 Fed. Reg. 4424, (Jan. 15, 2025) (final 2026 NBPP) (reaffirming State obligation to defray costs of benefits mandated in addition to EHB under 45 C.F.R. § 155.170 and CMS authority to oversee compliance through Exchange standards) [2025-00640.pdf](#)