

inseparable

March 12, 2026

Rhode Island House Health and Human Services Committee
82 Smith St.
Providence, RI 02903

Via electronic submission

RE: Support for HB 7946 (The Protect Mental Health Act)

Chair Donovan, Vice Chairs Giraldo and Potter, and Members of the Committee:

On behalf of Inseparable, a national nonprofit organization focused on closing the treatment gap for people with mental health and substance use conditions, I write in **strong support of House Bill 7946**, legislation to codify key protections from the 2024 federal Mental Health Parity and Addiction Equity Act (MHPAEA) rule into Rhode Island law.

Why HB 7946 Is Necessary Now

Mental health parity has been federal law for more than 15 years, yet too often it exists only on paper. Rhode Island families are told that mental health and substance use services are “covered,” but then encounter inequitable barriers to care. Federal agencies have repeatedly found that insurers have failed to demonstrate compliance with parity requirements, particularly for nonquantitative treatment limitations such as prior authorization, network design, and medical necessity criteria.

The 2024 federal parity rule, which was finalized by the Biden administration, was adopted to improve parity compliance by clarifying obligations around meaningful benefits, data-driven oversight, and nondiscriminatory standards. That rule is now under threat at the federal level after the Trump administration said it will not enforce current law – a precursor to likely undoing current parity protections. HB 7946 ensures that Rhode Islanders’ parity rights are maintained, if the federal regulations are rolled back.

Ensuring Meaningful Mental Health and Substance Use Benefits

HB 7946 makes clear that, when a health benefit plan provides medical/surgical benefits within a parity classification (e.g. in-network outpatient), it must also provide meaningful mental health and substance use benefits within that same classification. This includes coverage of core treatments – the standard, clinically accepted treatments for mental health and substance use conditions, such as nutritional counseling to treat eating

disorders and psychotherapy and medications for opioid use disorder. Too often, plans technically cover mental health or substance use conditions while excluding such core treatments, leaving Rhode Islanders without equitable mental health and substance use coverage.

Using Data to Identify and Address Access Disparities

A key strength of HB 7946 is its focus on real-world access. The bill requires carriers to collect and evaluate data to assess how non-quantitative treatment limitations affect access to mental health and substance use benefits compared to medical/surgical benefits within the same parity classifications. When this data shows material differences in access, those disparities are treated as strong indicators of noncompliance. Importantly, carriers must then take reasonable actions to address identified disparities, ensuring that parity enforcement is grounded in outcomes for patients, not just written policies.

Prohibiting Discriminatory Standards

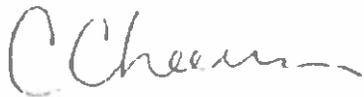
HB 7946 reinforces a core principle of parity: insurers may not rely on biased or discriminatory factors, evidence, or information when setting limits on mental health or substance use care. This common-sense provision prevents insurers from justifying unfair restrictions by pointing to sources that are themselves biased against mental health or substance use conditions.

Precedent in Other States

We commend Rep. Tanzi for her leadership in introducing this legislation. Importantly, Rhode Island would not be acting alone. In 2025, both Washington and Colorado enacted legislation to codify the 2024 federal parity rule into state law.

We respectfully urge the Committee to issue a favorable report on House Bill 7946. If you would like to discuss this issue further, please reach me at david@inseparable.us.

Sincerely,



Cara Cheevers
Vice President of Coverage Policy
Inseparable