

April 16, 2026

The Honorable Melissa Murray, Chair, Senate Committee on Health and Human Services
Via email to: SLegislation@rilegislature.gov

Senate Bill 2108, An Act Relating to Insurance

Dear Chairwoman Murray and Members of the Committee:

On behalf of Blue Cross & Blue Shield of Rhode Island (Blue Cross), I am writing to express opposition to this proposal relating to health plans' payment levels.

Blue Cross is committed to improving access to quality behavioral health care services and maintaining affordability for our members, including by collaborating with health care providers on innovative ways to deliver and pay for care. While we share the sponsors' interest in supporting a robust and appropriately compensated delivery system, we urge the Committee not to legislatively mandate payment floors and externally indexed payment methodologies, such as pegging the minimum rate to Medicaid.

Regarding setting rates in comparison to Medicaid, Blue Cross takes this payment level into consideration and believes its rates exceed those paid by Medicaid. However, requiring payments be indexed to Medicaid creates compliance and operational concerns. Medicaid may use different codes or payment arrangements. Commercial carriers should have flexibility to use different payment arrangements in order to improve access to quality, affordable care appropriate to their membership. Payment policy should remain flexible to support value-based arrangements.

Statutorily setting rates or a rate floor creates a problematic precedent. Legislators will be asked to do this for more services, and at increasing levels. Such legislative payment mandates, once begun, will remove the ability to negotiate based on access, capacity, and quality. Increased payments are unlikely to be tied to obligations on providers. Mandated rates at higher levels will increase premiums.

The Office of the Health Insurance Commissioner convenes a Payment and Care Delivery Advisory Committee to advance health care system performance and affordability. This committee, which includes payers, providers, consumers, and state agencies, is well positioned to take up these issues.

We appreciate your consideration.

Respectfully submitted,
Richard Glucksman,
Senior Government Affairs Counsel

Attached: Behavioral Health Resource Guide for BCBSRI Youth and Adult Members