



April 16, 2026

The Honorable Melissa Murray
Chairperson, Senate Committee on Health and Human Services
Rhode Island State House
82 Smith Street
Providence, RI 02903

RE: Letter of Education regarding S2108 – AN ACT RELATING TO INSURANCE – ACCIDENT AND SICKNESS INSURANCE POLICIES

Dear Chairperson Murray:

I write on behalf of the State of Rhode Island Office of the Health Insurance Commissioner (OHIC) regarding [Senate Bill 2108](#). OHIC understands the intent of this legislation is to require commercial health insurers to reimburse providers at rates not less than the Medicaid fee-for-service fee schedule rates set by the Executive Office of Health and Human Services. Though this appears to be the intent of the legislation, the current construction of the bill may not achieve the sponsor's goals.

The sections of existing law that the bill seeks to amend are narrowly applicable to a particular subset of commercial health insurers, namely an:

"insurance company organized as a stock or mutual corporation which merges or consolidates with, acquires ownership or control or possession of twenty percent (20%) or greater of the operating assets of, or otherwise acquires control of a non-profit hospital service corporation organized under chapter 19 of this title, a non-profit medical service corporation organized under chapter 20 of this title or a health maintenance organization organized under chapter 41 of this title."

Additionally, the sections of law in the bill pertain specifically to commercial health insurance "premiums" – i.e., the term "rate" in these sections is used to refer to premiums as opposed to provider reimbursement rates. If the intent of this law is to set standards for commercial health insurance reimbursement rates and not premiums, the bill as written will be narrowly applicable and may cause confusion and enforcement challenges. Moreover, given the grammatical construction of the existing law, the amended language has the unintentional result of materially altering the current prohibition set forth in RIGL §§ 27-18-54 (1); 27-19-30.1(1); 27-20-25.2(1); and 27-41-27.2(1).

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Thank you for your continued leadership and hard work on all matters related to the health of Rhode Islanders.

Sincerely,



Cory B. King
Health Insurance Commissioner

CC: Honorable Members of the Senate Committee on Health and Human Services
Honorable Jacob E. Bissaillon
Kristen Silvia, Director of Legislation and Deputy Chief of Staff