



April 14, 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 S2382 – 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) to provide technical comments regarding [Senate Bill 2382](#). This letter is not intended as a position in support of or opposition to the bill, but only as recommendations on drafting to provide clarity to the bill and to aid OHIC with enforcement.

OHIC notes that the Genetic Testing sections of law currently set forth prohibitions and restrictions on carriers' ability to require or use genetic tests. From a technical drafting standpoint, OHIC recommends that the proposed amendments to the Genetic Testing sections of Chapters 18, 19, 20 and 41 of Title 27 (specifically RIGL §§ 27-18-52, 27-19-44, 27-20-39, and 27-41-53), be redacted from S2382. Amending these sections to also include the infertility service coverage requirements as are set forth in RIGL §§ 27-18-30, 27-19-23, 27-20-20 and 27-41-33 is unnecessary to achieve the bill's legislative intent and liable to cause confusion.

OHIC points out that proposed subsections 27-18-52(i)(2), 27-19-23(h)(2), 27-20-20(i)(2) and 27-41-33(i)(2) each appear to be missing the word "and" after the semicolon. With regard to the "(i)" and "(ii)" subsections following 27-18-52(i)(3), 27-19-23(h)(3) and 27-20-20(i)(3), OHIC inquires whether these were intended to be numerical subsections of (3) or intended to be alphabetical subsections following after 27-18-52(i), 27-19-23(h) and 27-20-20(i) as well as whether the references to "this subsection" in the text of those passages were intended to instead use the phrase "this section."

Regarding 27-41-33(i)(3), OHIC inquires whether the bill intentionally omitted the following subsection language that appears in the amendments to 27-18-52, 27-19-23 and 27-20-20 -- *"For the purpose of this subsection, "nationally recognized clinical practice guidelines" means evidence-based, peer reviewed clinical practice guidelines informed by a systematic review of evidence and an assessment of the benefits, and risks*

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of alternative care options intended to optimize patient care developed by independent organization professional societies utilizing a transparent methodology and reporting structure and with a conflict-of-interest policy.” Also, 27-41-33(i)(3)(i)’s reference to “this subsection” should likely be revised to “this section”.

Finally, OHIC noticed that subsection 27-18-52(d)(3)(ii) references, “...*nationally recognized clinical practice guidelines for the detection of lung cancer,*” whereas all other similar subsections under §§ 27-19-44, 27-20-39, and 27-41-53 say, “...*nationally recognized clinical practice guidelines for PGD.*”

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 Lori Urso
Kristen Silvia, Director of Legislation and Deputy Chief of Staff