



Monday, March 23, 2026

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

Via electronic submission

RE: Support for SB 2564 (Fair Standards in Mental Health Care)

Chair Murray, Vice Chair Lauria, and Members of the Committee:

On behalf of Inseparable, a national mental health advocacy organization founded on the principle that mental health is inseparable from physical health, I write in **strong support of SB 2564**, a bill that would require insurers to use independent clinical criteria created by mental health and substance use disorder (MH/SUD) experts.

Across Rhode Island, many families struggle to access mental health and substance use disorder treatment—even when their health plan promises to cover medically necessary services. Inconsistent and opaque coverage rules can lead to delays, denials, and premature termination of life-saving treatment. When patients are unable to access appropriate care, the consequences can include worsening mental and physical health conditions, financial strain, and broader impacts on families and communities.

This legislation takes an important step toward addressing these challenges by focusing on the criteria insurers use to make coverage decisions for mental health and substance use disorder services. While this issue may sound technical, it is a critical gap in the current system that allows inappropriate denials and delays of medically necessary treatment.

When a patient is in crisis—particularly a child or loved one—and an insurer is considering denying a physician-recommended treatment, families should be able to trust that those decisions are based on objective, evidence-based clinical standards.

Unfortunately, that is often not how the system works today.

In Rhode Island and across the country, insurers frequently rely on proprietary clinical criteria purchased from for-profit companies to determine whether MH/SUD treatment will be covered. These criteria are not transparent, are not developed through an open process, and are not independently validated by the nation's clinical experts. In many cases, insurers are also able to modify or "customize" these criteria to align with their business interests, which often further restricts access to care and quality of coverage determinations.

HB 7945 addresses this problem by requiring insurers to use clinical criteria that are developed by nonprofit organizations composed of medical and behavioral health experts. These evidence-based standards are widely used by clinicians and are designed to ensure patients receive the safest and most appropriate level of care for their condition.

By aligning the standards used by insurers with those used by treating clinicians, this bill will create a consistent framework for determining medical necessity. It will establish a shared, transparent rulebook for insurers, providers, and patients—helping ensure that coverage

decisions are grounded in sound clinical judgment rather than opaque proprietary guidelines.

For these reasons, **I respectfully urge the committee to support SB 2564 and help make the promise of mental health coverage a reality for Rhode Islanders.**

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink that reads "David Lloyd". The signature is written in a cursive, flowing style.

David Lloyd
Chief Policy Officer
Inseparable