



March 24, 2026

The Honorable Senator Melissa A. Murray
Chairwoman of the Senate Health and Human Services Committee
RI State House
82 Smith Street
Providence, RI 02903

Re: Support for Senate Bill 2564 – Mental Health Accepted Standards of Care

Dear Chairwoman Murray and Members of the Committee:

Thank you for the opportunity to express the Mental Health Association of Rhode Island's (MHARI) support for **Senate Bill 2564**, which strengthens Rhode Island's mental health parity law by requiring insurers to rely on generally accepted standards of care when determining coverage for mental health and substance use disorder treatment. This bill ensures that clinical decisions about behavioral health care are guided by accepted medical standards rather than insurance policies. We thank **Senator Ujifusa** for introducing this important legislation.

About one in five Rhode Islanders will experience a mental or behavioral health condition in their lifetime. Seeking care is a courageous step, yet many individuals encounter a demoralizing barrier when their health insurer denies the level of treatment recommended by their provider. For many Rhode Islanders, the greatest obstacle to behavioral health care is not the availability of providers, but insurance coverage decisions that limit access to medically necessary treatment.

Even when parity laws exist, insurers may apply internal clinical criteria that are more restrictive than the standards used by clinicians in practice. When this occurs, patients may be denied the appropriate level of care, leading to worsening symptoms, unnecessary hospitalizations, and prolonged suffering.

The legislation addresses this problem by requiring insurers to rely on widely recognized clinical placement criteria—such as the Level of Care Utilization System (LOCUS) and the Child and Adolescent Level of Care/Service Intensity Utilization System (CALOCUS-CASII)—when determining levels of care. Developed by clinical experts and used across the country, these tools help ensure that treatment decisions are based on medical need and accepted clinical practice.

Requiring insurers to use consistent standards also has broader benefits. It improves access to timely care, which leads to **better outcomes** and can reduce costly hospital and emergency department utilization. It also reduces administrative burden and burnout among behavioral health providers, helping more clinicians remain in insurance networks and improving access to care for patients.

Importantly, **a universal set of guidelines promotes fairness and equity**. Today, two Rhode Islanders with the same diagnosis and level of need may receive very different treatment approvals depending on their insurance plan. One individual may be approved for several weeks of residential treatment, while another may be approved for only a fraction of that time, despite having the same clinical needs.

In focus groups, MHARI conducted with patients and providers, participants consistently described the frustration and powerlessness they experience when insurance decisions override clinical judgment. One mental health professional described the challenge this way: “It’s frustrating when you’re consistently coming up against barriers and you can’t help clients be where they need to be.” A consumer participant similarly shared that it can feel “demeaning to have to beg for some understanding to get treatment for an illness.”

These experiences illustrate why aligning insurance coverage with accepted clinical standards of care is so important. Rhode Islanders deserve access to treatment decisions based on clinical need—not restrictive insurance policies.

For individuals and families facing mental illness or substance use disorders, timely access to the appropriate level of care can mean the difference between recovery and crisis. MHARI respectfully urges the committee to support this legislation.

Thank you for your consideration and for your continued commitment to improving Rhode Island’s behavioral health system.

Respectfully,



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CC: Members of the Committee
Committee Clerk