

April 24, 2026

**Rhode Island State Senate**

Senate Committee on Health and Human Services

Re: **Support** of S-2687, The Protect Mental Health Act

Dear Chair Murray and Members of the Senate Committee on Health and Human Services:

RIPIN thanks the Senate Committee on Health and Human Services for the opportunity to submit this testimony **in support of** S-2687, which would codify supportive federal parity regulations originally promulgated during the previous administration in state law, retaining important consumer protections

In RIPIN's work as Rhode Island's consumer assistance program for health insurance issues, we've seen firsthand the difficulties that many Rhode Islanders face in accessing the behavioral health care they need to live their best lives. Health insurers frequently rely upon byzantine administrative processes like step therapy and prior authorization, which despite federal and state law to the contrary can be designed or operated to disadvantage access to behavioral health services. Carriers use clinical coverage criteria that are not in keeping with generally accepted standards of care, allowing them rather than a patient's doctors to make decisions about what types of treatment will be covered. And even when treatments are covered, reimbursement rates are frequently set systematically lower for behavioral health services than they are for other services.

Parity between mental health and substance use disorder services (MH/SUD) and medical/surgical services has been required under federal and Rhode Island law for many years. However, compliance with parity laws has been a challenge, both because health insurance carriers have found ways to continue to limit access, and because compliance with carrier internal policies (in the form of "non-quantitative treatment limitations," a broad category of ways that carriers throttle access to care) is difficult for regulators to monitor. But during the previous administration, federal rules were promulgated that clarified carriers' responsibilities and required carriers to provide actionable data to regulators to facilitate regulatory compliance review. S-2687 would codify those regulations in Rhode Island law (just as Colorado, Washington, Maryland, and Virginia have done) to ensure that their positive impact will be felt by Rhode Islanders, even as the current federal administration proposes a weakening of these consumer protections before the end of 2026.

The consumer protections contained within the federal regulations that S-2687 would codify in Rhode Island law include expanding upon the requirement that plans provide meaningful MH/SUD coverage in any classification of benefits for which they provide medical/surgical coverage; the prohibition of discriminatory standards in making coverage determinations; and an actionable framework by which compliance with existing parity requirements could more easily be measured, including data reporting for use by regulators. Each of these requirements is supported by nationwide behavioral health access champions and would meaningfully improve Rhode Islanders' access to behavioral health care.

S-2687 is part of a package of behavioral health parity-related bills before the Senate Committee on Health and Human Services this year (including S-2564, which would require that carriers use generally accepted standards of care in making clinical coverage decisions, and S-2467, which would prohibit prior authorization in behavioral health, both of which have already been heard) that would seek to improve consumers' access to the behavioral health services they need.





RIPIN urges the Senate Committee on Health and Human Services to approve this important legislation along with the rest of the package of parity-related bills, and thereby better protect health care access and affordability for Rhode Islanders. Thank you for the opportunity to provide these comments. RIPIN is a statewide nonprofit founded in 1991 by a group of parents of children with special healthcare needs. While RIPIN's roots are in serving children and families with special needs, RIPIN now serves all Rhode Islanders who might benefit from education, advocacy, and peer-to-peer support in navigating healthcare and education systems. RIPIN operates Rhode Island's health insurance consumer assistance program, RIREACH, which helped several thousand Rhode Islanders save more than \$10 million in health care costs since 2018.

Sincerely,

/s/

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