



May 5, 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 S2887– AN ACT RELATING TO INSURANCE – ACCIDENT AND SICKNESS INSURANCE POLICIES – DENTAL INSURANCE COVERAGE

Dear Chairperson Murray:

I write on behalf of the State of Rhode Island Office of the Health Insurance Commissioner (OHIC) to provide education and technical comments regarding [Senate Bill 2887](#). This letter is not intended as a position in support of or opposition to the bill. This letter is intended to provide education regarding potential policy impacts on consumers and to provide technical recommendations on drafting to provide clarity to the bill and to aid OHIC with enforcement.

OHIC notes that the bill's proposed amendments have the potential to undermine the incentives that dental carriers have to encourage dentists to join, or remain in, their networks; therefore, weakening consumer protections against balance billing that are associated with dental networks. An example of this can be found under subsection (b), which seeks to require dental insurers to reimburse out-of-network (OON) dentists *"at no less than the highest reimbursement amount actually paid to any participating provider for the same covered dental service."* The bill further requires that "the highest reimbursement" also be at least as high as any in-network (IN) incentive-based or performance-tiered fee schedule. As a result, OON dentists would be required to be reimbursed by dental carriers at the highest possible fee schedule payment of any INN participating dentist. At the same time, OON dentists, unlike INN dentists, would be able to balance bill their insured patients for any difference between the highest INN reimbursement amount and the dentists' usual and customary charge.

The following recommendation is technical in nature. Subsection (b) reads *"Upon receipt of a duly executed written direction to pay and written notice thereof, the entity shall pay the benefits and compensation directly to the dental care provider."* OHIC respectfully requests that the phrase *"and compensation"* be removed from this sentence. OHIC notes that the plan member does not have *"compensation"* under their plan that they are assigning to their OON dentist of choice. Nor does the dental plan have a contractual obligation to *"compensate"* an OON dentist.

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Subsection (a) includes language that a carrier must allow a plan beneficiary to assign “their benefits, and the corresponding reimbursement to the dental care provider for covered services, from a health benefit plan, policy, or contract be paid directly to any dental care provider who has or has not contracted with the entity.” OHIC respectfully requests the phrase “and the corresponding reimbursement to the dental care provider for covered services” be deleted. If a dental plan beneficiary has OON benefits for a covered service under their plan, then it makes sense to allow the beneficiary to assign whatever those OON benefits are directly to their provider of choice.

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 John P. Burke  
Kristen Silvia, Director of Legislation and Deputy Chief of Staff