



April 16, 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 S3022– 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 3022](#). 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 proposed subsections (a) require OHIC to develop guidelines for insurers to follow in developing a plan for providing adequate coverage of and access to a broad spectrum of pain management services including, but not limited to, nonopioid, nonnarcotic medication for pain management and nonmedication pain management services that serve as alternatives to the prescribing of opioid or narcotic drugs. Additionally, subsection (b) places additional obligations on OHIC in terms of reviewing carrier plans. OHIC notes that developing such guidelines around medically appropriate and effective opioid-alternative medications and non-medication pain management treatments is not within the scope of OHIC's expertise. OHIC would respectfully require additional funding to hire consultants with the appropriate expertise to develop any such guidelines, as well as to annually review the submitted plans.

OHIC also notes that the bill's proposed subsections (a) and (b)(2) that read "*Every individual or group health insurance contract, plan, or policy that provides prescription coverage and that is delivered, issued for delivery, prescribed, or renewed in this state on or after January 1, 2027*" could benefit from the deletion of the word "*prescribed*."

Thank you for your continued leadership and hard work on all matters related to the health of Rhode Islanders.

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Sincerely,



Cory B. King
Health Insurance Commissioner

CC: Honorable Members of the Senate Committee on Health and Human Services
Honorable Jacob Bissaillon
Kristen Silvia, Director of Legislation and Deputy Chief of Staff