



March 26, 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 regarding S3060 – AN ACT RELATING TO INSURANCE – PHARMACY BENEFIT MANAGERS ACT

Dear Chairperson Murray:

I write on behalf of the State of Rhode Island Office of the Health Insurance Commissioner (OHIC) regarding [Senate Bill 3060](#). This bill seeks to license and regulate pharmacy benefit managers (PBMs). To improve clarity, enforceability, and implementation of the requirements set forth in this bill, OHIC respectfully shares the following recommendations.

OHIC requests clarification within the bill as to whether DBR or OHIC is being assigned jurisdiction over the bill's provisions. Under § 27-84-2 (page 1, line 12), "director" is defined as the director of the department of business regulation. However, applying the interpretive requirements of § 42-14-5, it is arguable that this reference to "director" could instead refer to the health insurance commissioner. Failure to provide this clarification will result in significant enforcement and implementation challenges, especially given the extensive new licensing and regulatory activities called for by the proposed Pharmacy Benefit Managers Act.

OHIC recommends that proposed subsection § 27-84-12 on Assessments be revised to clarify that the operating expenses of the relevant department or office are inclusive of the reasonable expenses of any outside experts, consultants and contractors retained by the relevant state agency.

OHIC notes that subsection § 27-84-8(b)'s proposed time frame of holding of an administrative hearing within 10 days of notice of revocation or suspension of a certificate of authority as well as the mandatory nature of holding such a hearing is inconsistent with the provisions of proposed subsection § 27-84-8(c) and could be made procedurally more efficient and realistic by replacing the language of subsection (b) with language consistent with existing § 27-18.8(c).

Additionally, OHIC respectfully requests the following:

- at least two additional FTEs be created for whichever state agency is tasked with conducting the work required under this bill;

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- delaying the effective date of the bill to no earlier than 1/1/2028 in order to stand up complex licensing and related regulations, instructions as well as reviewers with the necessary expertise.

Finally, OHIC wishes to bring to the attention of the committee that the recently enacted federal [Consolidated Appropriations Act of 2026](#), includes extensive new federal reforms for pharmacy benefit managers, focused on rebate pass-through, increased transparency, standardized reporting, and expanded federal oversight.

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 Peter A. Appollonio Jr.  
Kristen Silvia, Director of Legislation and Deputy Chief of Staff