

April 7, 2026

The Honorable Melissa Murray, Chair, Senate Committee on Health and Human Services
Via email to: SLegislation@rilegislature.gov

Opposition to: Senate Bill 3091, relating to insurance

Dear Chairwoman Murray and Members of the Committee:

On behalf of Blue Cross & Blue Shield of Rhode Island (Blue Cross), I am writing in opposition to this legislation.

We share your goal of ensuring Rhode Islanders have access to high-quality health care. However, this bill would impose a significant new financial burden on subscribers of commercial health insurance, including individuals, families, and employers, as well as municipalities and the state health plan.

Hospital costs are the largest element of commercial insurance spending. This policy shifts additional hospital costs onto commercial health plans, which will directly translate into higher premiums and greater cost sharing for members. At a time when healthcare affordability remains a dominant concern for Rhode Islanders, this legislation risks pushing coverage beyond what many Rhode Islanders can afford.

The bill's approach to uncompensated care places disproportionate responsibility on the commercial market. Uncompensated care, as defined in the bill, is driven largely by services provided to uninsured individuals and Medicaid underpayment, yet the costs would be borne by commercial subscribers. This shifts the financial obligations of public programs and the uninsured onto those already paying the highest premiums in the market, further accelerating healthcare cost growth, while raising fundamental fairness concerns and increasing the ranks of the uninsured.

The bill threatens to undermine one of Rhode Island's most successful affordability strategies. The Office of the Health Insurance Commissioner's hospital cost growth targets and Affordability Standards have been credited with helping slow premium growth while promoting accountability and transparency. Weakening or bypassing these guardrails risks dismantling a framework that has meaningfully protected consumers from unchecked cost increases.

The bill disrupts the collaborative balance that has been built between hospitals, health plans, and regulators. We work constructively with hospital partners to address financial challenges and support system sustainability. This legislation risks shifting costs to subscribers without accountability and in a way that ultimately harms commercially insured Rhode Islanders.

We remain committed to working collaboratively with hospitals, regulators, and legislators on solutions that strengthen the healthcare system without making coverage more unaffordable. We respectfully urge the committee to consider the impact of S3091 on premiums and cost sharing.

Respectfully submitted,
Richard Glucksman, Senior Government Affairs Counsel
Blue Cross & Blue Shield of Rhode Island