



April 2, 2026

The Honorable Melissa A. Murray
Chair, Senate Committee on Health and Human Services
82 Smith Street
Providence, RI 02903

RE: SB 3156 – Accident and Sickness Insurance Policies – Oppose

Dear Chair Murray, Vice Chair Lauria, and Members of the Committee,

On behalf of the National Association of Dental Plans (NADP)¹ and the American Council of Life Insurers (ACLI)², we appreciate the opportunity to provide comments in opposition to SB 3156 regarding the use of electronic payments, including virtual credit cards, in dental insurance transactions.

Virtual credit cards allow providers to obtain reimbursement for services quickly and efficiently using existing credit card terminals. Requiring providers to affirmatively opt in to receiving payments via this method, as proposed in subsection (a)(4) would create unnecessary administrative burdens for both providers and plans, potentially resulting in payment delays and limiting access to virtual credit card payment options.

Additionally, the proposed language in (4)(b) barring any fee or charge associated with the transmission, processing, or issuance of payments would effectively prohibit the use of virtual credit cards altogether. Virtual credit cards rely on standard transaction and processing fees that are consistent with widely accepted payment practices across industries, including other healthcare transactions. Today, dental plans offer multiple payment options, allowing providers to choose the method that best fits their business needs. Rather than regulating virtual credit cards or preserving provider choice, this language eliminates a legitimate electronic payment option entirely. The result would be disruption to established payment systems, reduced flexibility for plans and providers alike, and a step backward from efforts to modernize healthcare payments through secure, efficient, and practical electronic solutions.

¹ NADP is the largest non-profit trade association focused exclusively on the dental benefits industry. NADP's members provide dental HMO, dental PPO, dental indemnity and discount dental products to more than 200 million Americans with dental benefits. Our members include the entire spectrum of dental carriers: companies that provide both medical and dental coverage, companies that provide only dental coverage, major national carriers, regional, and single state companies, as well as companies organized as non-profit plans.

² The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 275 member companies represent 94 percent of industry assets in the United States.

Over the past several years, states have consistently adopted an opt-out approach to virtual credit card and electronic payment requirements for dental plans. To date, **15 states have enacted opt-out frameworks**, reflecting a clear and established industry standard that balances provider choice with administrative efficiency. This structure ensures that:

- Providers have access to multiple payment methods, including no-cost options;
- Providers may decline virtual credit card payments at any time in favor of other payment options; and
- Plans may continue to process payments efficiently without unnecessary administrative delays.

By contrast, an opt-in approach presents several practical concerns. Plans vary significantly in when and how payment method choices are presented to providers, whether at the time of initial contracting, contract renewal, or at other points, including in some cases on a transaction-by-transaction basis, making implementation particularly difficult. Additionally, if a provider does not affirmatively make an opt-in selection, it is unclear how payments would be processed, increasing the risk of confusion, payment delays, and disruption to provider cash flow.

Virtual credit cards, when offered alongside alternative payment methods, provide administrative efficiencies and enable fast, traceable reimbursement using existing processing systems. An opt-out model appropriately balances provider autonomy with operational efficiency. It protects provider choice without creating a system in which reimbursement may hinge on whether a specific affirmative election has been captured at the correct administrative moment.

For these reasons, we respectfully oppose SB 3156 and urge consideration of maintaining the opt-out approach that preserves provider choice while ensuring timely and predictable reimbursement.

Respectfully submitted,



Bianca Balale
Director of Government Relations
National Association of Dental Plans (NADP)



Jill Rickard
Regional Vice President, State Relations
American Council of Life Insurers (ACLI)