



April 11, 2024

The Honorable Joseph J. Solomon, Jr.
House Corporations Committee
State of Rhode Island General Assembly

Re: House Bill 7519 – Health Care Accessibility and Quality Assurance Act – OPPOSE

Dear Representative Solomon and Distinguished Members of the Committee,

On behalf of the American Council of Life Insurers (ACLI)¹, AHIP², and the National Association of Dental Plans (NADP)³, thank you for the opportunity to provide comments on House bill 7519, which would create extraterritorial regulatory requirements for dental plans.

The bill would require dental services and treatment rendered to patients in Rhode Island to be reimbursed by standards governed by the general laws of Rhode Island. Currently, dental carriers domiciled in Rhode Island are subject to a certification process that includes filings with the Department of Business Regulation and periodic review and recertification. In 2020, 92 percent of Rhode Island residents had dental coverage, with an average premium of less than \$37 a month.

Applying the bill's requirements to certificates issued to Rhode Island residents through groups located outside of Rhode Island could create an insurmountable administrative burden on both carriers and the state, leading to the potential exclusion of Rhode Island resident participants from those plans. For example, an employer domiciled in Connecticut may offer a dental

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² AHIP is the national association whose members provide health care coverage, services, and solutions to hundreds of millions of Americans every day. We are committed to market-based solutions and public-private partnerships that make health care better and to help create a space where coverage is more affordable and accessible for everyone.

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benefits plan that is certified under Connecticut law but facilitates oral health coverage in both Connecticut and Rhode Island. This bill would require that plan to also be certified in Rhode Island.

Dental plans working with non-domiciled employers may opt not to offer coverage in Rhode Island and leave the state to avoid the extensive administrative costs of competing standards. In short, the bill's proposed extraterritorial standards could limit access to dental care and raise the cost of coverage for Ocean Staters.

We appreciate the opportunity to provide comments and are available to answer questions or provide additional information.

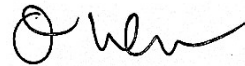
Respectfully Submitted,



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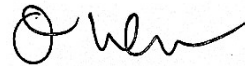
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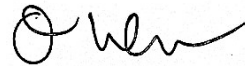
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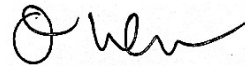
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