

June 10, 2024

The Honorable Joseph Solomon, Chair
House Corporations Committee
Rhode Island General Assembly

RE: House Bill 7944, Dental Loss Ratio Reporting

Dear Senator Miller and Distinguished Committee Members,

On behalf of the American Council of Life Insurers (ACLI)¹ and the 14 ACLI member companies listed below, each of which offers dental insurance benefits, we appreciate the opportunity to provide comments on House Bill 7944. The bill would require the health insurance commissioner to review and analyze three years of dental loss ratio (DLR) reports by health insurance carriers offering dental benefits in Rhode Island before making a recommendation regarding the potential imposition of a minimum DLR.

Requiring three years of reporting and analysis is a prudent and balanced approach, consistent with that of all other states that have enacted legislation regarding a minimum DLR. Imposing a minimum DLR *without actuarial and policy analysis* could have harmful unintended consequences, particularly with respect to Rhode Island's small group market, by dramatically reducing the availability of dental coverage and negatively impacting access to oral health care. In Massachusetts, the only state that has imposed a minimum dental loss ratio (via ballot initiative), at least six dental carriers have so far opted to exit the small group market as a result, leaving its residents with fewer options for coverage. By allowing the Rhode Island health insurance commissioner to make an informed recommendation based on actuarial and policy analysis of carriers' DLRs, this bill will ensure that Rhode Island's dental insurance market does not suffer the same fate as its neighbor's.

Thank you for the opportunity to comment on House Bill 7944. Please feel free to contact me with any questions.

Respectfully Submitted,



Jill Rickard
Regional Vice President- State Relations
ACLI
(202) 624-2046
jillrickard@acli.com

On behalf of Aflac, Ameritas, Federal Life Insurance Company, The Guardian Life Insurance Company of America, The Hartford Financial Services Group, Inc., Lincoln Financial Group, MetLife, Mutual of Omaha, Pacific Life Insurance Company, Physicians Mutual, Principal Financial Group, Sun Life, Unum, and USABLE Life

¹ The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. Ninety 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 93 percent of industry assets in the United States.