



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 National Association of Dental Plans (NADP),¹ AHIP,² and the American Council of Life Insurers (ACLI),³ 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

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.

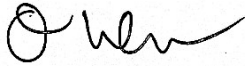
² AHIP is the national association whose members provide health care coverage, services, and solutions to hundreds of millions of Americans every day. We are committed to market-based solutions and public-private partnerships that make health care better and to help create a space where coverage is more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

³ 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.

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 us with any questions.

Respectfully Submitted,



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