

March 18, 2025

Rhode Island State House
House Committee on Health and Human Services

Re: Support of H-5432, Behavioral Health Prior Authorization

Dear Chair Donovan and Members of the House Committee on Health and Human Services:

RIPIN thanks the House Committee on Health and Human Services for the opportunity to submit this testimony in support of H-5432, which would prohibit the use of prior authorization for in-network behavioral health services.

As Rhode Island's health insurance consumer assistance program, RIPIN routinely encounters Rhode Islanders who face challenges in accessing routine, in-network behavioral health care. This is both because of a lack of available providers who accept insurance, and because even when a patient connects with an in-network provider, care can be refused or at least delayed due to administrative barriers.

While many factors culminate in the lack of behavioral health providers participating in insurance, including low reimbursement rates, complicated rules for network admission, and a lack of system investment (through things like loan repayment or practice incentives) to encourage medical students to pursue primary and behavioral health rather than higher-paid specialties, the administrative complexity of utilization review and high burden of prior authorization is frequently acknowledged by providers as a significant disincentive to network participation.

And even when a provider accepts insurance, that is not a guarantee of coverage for needed services. Insurer prior authorization processes can result in noncoverage of needed treatments based on coverage criteria developed by the plans themselves. When services are covered, they may be covered at a lesser frequency, for a lesser duration, or at a lower level of intensity than a prescribing provider truly believes is necessary, when prior authorizations result in a coverage determination by the insurer that a lower level of care is necessary than what the provider orders. And even when services are covered at the level ordered, the administrative burden and turnaround times associated with prior authorization can mean that an urgent services takes longer than is appropriate to be authorized.

OHIC has recently published final rules which require a reduction in the volume of prior authorizations conducted by insurers. RIPIN strongly supported that process and the outcome, which requires 1) a 20% reduction in prior authorization volume, and 2) a prioritization of reducing prior authorizations filed by primary care providers. In testimony supporting a reduction in prior authorization volume in late 2024, RIPIN encouraged that reductions in prior authorization be particularly targeted to areas where the value proposition of prior authorizations (i.e. to reduce unnecessary or medically contraindicated care) was particularly low, and where the patient experience of care was particularly difficult, such as primary care and behavioral health care. While OHIC retained the aforementioned prioritization of reducing prior authorization volume in primary care, OHIC did not include any





required reductions to prior authorization in behavioral health. RIPIN hopes that this can provide a template for the change proposed in H-5432, which acknowledges that similar logical underpinnings exist to reduce or eliminate prior authorizations for both primary care and behavioral health care.

Thank you for the opportunity to provide this testimony. RIPIN urges the House Committee on Health and Human Services to approve this important legislation and protect and improve access to behavioral health for Rhode Islanders. RIPIN is a statewide nonprofit founded in 1991 by a group of parents of children with special healthcare needs. While RIPIN's roots are in serving children and families with special needs, RIPIN now serves all Rhode Islanders who might benefit from education, advocacy, and peer-to-peer support in navigating healthcare and education systems. RIPIN operates Rhode Island's health insurance consumer assistance program, RIREACH, which helped several thousand Rhode Islanders save more than \$8 million in health care costs since 2018.

Sincerely,

/s/

Shamus Durac
Senior Attorney / Health Policy Analyst
(401) 270-0101, ext. 125
SDurac@ripin.org

/s/

Sam Salganik
Executive Director
(401) 270-0101 ext. 101
Salganik@ripin.org