



To: House Health & Human Services Committee
From: Karen Malcolm, Protect Our Healthcare Coalition, ProtectRIHealth@gmail.com
Date: March 18, 2025
Re: **SUPPORT H5432 and H6061** – Improve patient access to behavioral health services by strengthening Rhode Island’s Mental Health Parity Act and reforming prior authorization practices

The Protect Our Healthcare Coalition is a group of leading Rhode Island non-profits and consumer groups with a shared mission to protect, improve, and expand equitable access to quality, person-centered, affordable health care for all. The Coalition **supports House Bills 5432 and 6061** and thanks Representative Tanzi for her work on this important legislation.

Combined, these bills will increase consumers' access to services by reducing prior authorization and unpredictable medical necessity criteria; improve patient outcomes; and reduce providers' administrative burden, costs, and burnout.

When Rhode Island’s (and the Federal) Mental Health Parity Act was passed, the intent was to prohibit discriminatory treatment limitations in coverage for mental health and substance use disorder services. However, our experience here in Rhode Island, despite improvements and a strong and supportive Office of Health Insurance Commissioner, has demonstrated that the current regulations are still insufficient to consistently hold insurers accountable for discriminatory treatment limitations, especially hard-to-regulate non-quantitative treatment limitations (NQTLs).

Specifically, Bill H6061 would strengthen the state’s existing mental health parity statute by establishing a more clearly enforceable definition of medical necessity based on generally accepted standards of mental health and substance use disorder care. This is important because the use of flawed medical necessity criteria has allowed insurers to wrongly deny mental health and addiction coverage. These denials have, unfortunately, been found to be commonplace and are reflected in the findings of [market conduct exams completed here in Rhode Island by OHIC in 2020](#). According to the Kennedy Forum, “By using flawed criteria, insurers often inappropriately limit mental health and addiction coverage to treating short-term symptom reduction while refusing to cover ongoing treatment for chronic mental health and addiction conditions.”

Bill H5432 is also a crucial step towards addressing the consistent problem that providers and patients face due to burdensome prior authorization processes that not only undermine the financial stability of our mental health and substance use treatment providers but also jeopardize the well-being of our patients.

We strongly urge the Committee to support this vital bill, which is a significant step towards improving patient access to behavioral health services and strengthening Rhode Island’s Mental Health Parity Act.

Thank you.

Protect Our Healthcare Coalition partners include: Economic Progress Institute, RIPIN, Mental Health Association RI, RI Health Center Association, Latino Policy Institute, Central Providence Opportunities: A Health Equity Zone (CPO-HEZ), United Way of Rhode Island, Senior Agenda Coalition RI, RI Medical Society, Planned Parenthood of Southern New England, SEIU Rhode Island Council, American Cancer Society Cancer Action Network, Leukemia/Lymphoma Society, RI Coalition for the Homeless, Rhode Island Working Families Party, Mental Health Recovery Coalition, RI Community Food Bank, RI Psychological Association, Substance Use & Mental Health Leadership Council, Rhode Island Coalition for Children and Families, HousingWorks RI, Rhode Island Organizing Project (RIOP), National Association of Social Workers RI Chapter, The Womxn Project, Advocates for Better Care
