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February XX, 2026

RE: AN ACT to amend the insurance law, in relation to requiring certain health insurance policies to provide coverage for diabetes and prediabetes screening

A.1206-B (Kim)
S.634-B (Liu)

MEMORANDUM IN OPPOSITION

Submitted on behalf of the Blue Cross and Blue Shield Plans

The New York State Conference of Blue Cross and Blue Shield Plans strongly opposes enactment of this legislation, which would mandate comprehensive health insurance coverage for diabetes and prediabetes pursuant to a national evidence-based practice guideline. This coverage would be required to be provided without a deductible, coinsurance, or any other cost sharing requirement. While diabetes screening is important, these screenings are already largely required to be covered by Plans under the Affordable Care Act (“ACA”). As such, this bill would result in unnecessary, duplicative, coverage, which only stands to result in overutilization and potential costs to the State.

Diabetes is a significant health issue in the United States, with an estimated 40.1 million Americans with the disease as of January 21, 2026.¹ This number represents nearly 12% of the U.S. population, and is only increasing. Type 2 diabetes is estimated by the University of Georgia to have increase by almost 20% between 2012 and 2022.² Complications associated with diabetes include cardiovascular disease, nerve, kidney, eye, and foot damage, hearing impairments, Alzheimer’s and depression.³

Given the risks of diabetes, the United State Preventive Services Task Force (“USPSTF”) currently recommends high risk individuals, asymptomatic adults aged 35 to 70 years who are overweight

¹ National Diabetes Statistics Report, U.S. Centers for Disease Control and Prevention, *available at*: <https://www.cdc.gov/diabetes/php/data-research/index.html>

² “Type 2 diabetes increased by almost 20% over a decade,” UGA Today, *available at*: <https://news.uga.edu/type-2-diabetes-increased-by-almost-20/>

³ “Diabetes,” Mayo Clinic, *available at*: <https://www.mayoclinic.org/diseases-conditions/diabetes/symptoms-causes/syc-20371444>.

or obese, to be screened for prediabetes and diabetes at a “B” grade. Under the ACA, non-grandfathered Health Plans are required to cover preventive services with an “A” or “B” grade by the USPSTF without cost sharing. As such, coverage for diabetes and prediabetes screenings pursuant to a national evidence-based practice guideline without cost sharing is already required by federal law.

For all of the forgoing reasons, the New York State Conference of Blue Cross and Blue Shield Plans strongly opposes the enactment of this legislation.

Respectfully submitted,

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Legislative Counsel for the Blue Cross and Blue Shield Plans