HINMAN STRAUB PC
ATTORNEYS AT LAW

121 State Street
Albany, New York 12207-1693
Tel: 518-436-0751
Fax: 518-436-4751

May 4, 2026

RE: AN ACT to amend the insurance law, in relation to establishing a requirement for information related to specialized dental benefit plans

A.3919-B (Weprin)
S.6254-B (Skoufis)

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 opposes the enactment of this bill, which would require any insurer that issues, sells, renews, or offers a specialized dental benefits policy or contract to file an annual report with the Superintendent of Financial Services organized by market and product type. This report would be required to include: the number of covered persons, including the number of covered persons which meet or exceed the annual coverage limit; plan cost sharing and deductible amounts; and, the annual maximum coverage limit. While transparency in coverage to members is important, this requirement on health plans would be onerous and duplicative. This unnecessary increase in costs will necessarily be passed on to the consumer, unnecessarily driving up premiums for stand-alone dental insurance.

In New York, insurers, including health insurers who offer stand-alone dental coverage, are supervised by the Department of Financial Services ("DFS"). Prior to any stand-alone dental policy being issued, the DFS must annually review and approve such forms. As such, the DFS is already aware of each policy's number of covered persons and the maximum coverage limit of the policy. Moreover, such approved forms are publicly accessible via SERFF Filing Access, if desired. As such, the information this bill is designed to collect is already available and known by the DFS and is accessible by the public.

This bill is also unnecessary in light of current statutory power given to the DFS. Broadly, the Insurance Law permits the DFS to require specialty reports to be submitted by insurers, in addition to any reports required to be submitted under the Insurance Law.[1] Such reports may be "in such

[1] Insurance Law § 308.

form and shall contain such matters as the superintendent shall prescribe."[2] As such, the DFS already has broad authority to require the reports this bill would require.

Additional and redundant reporting will also increase administrative costs on health plans.Administrative costs account for 15 to 30% of all health care spending in the United States.[3] Such unnecessary costs will continue driving the cost of insurance premiums upwards, to the detriment of New York consumers.

For the foregoing reasons, the New York State Conference of Blue Cross and Blue Shield Plans opposes this bill and urges that it not be enacted.

Respectfully submitted,

HINMAN STRAUB ADVISORS, LLC
Legislative Counsel for the Blue Cross and Blue Shield Plans

[2] *Id*.
[3] The Role of Administrative Waste In Excess US Health Spending, HealthAffairs, (Oct. 6, 2022), available at: https://www.healthaffairs.org/content/briefs/role-administrative-waste-excess-us-health-spending.