



Hugh McDonald
SECRETARY OF COMMERCE

Jimmy Harris
COMMISSIONER,
ARKANSAS INSURANCE
DEPARTMENT

September 29, 2025

Senator Tyler Dees, Co-Chair
Representative Matthew Shepherd, Co-Chair
Administrative Rules Subcommittee
Arkansas Legislative Council
Via Rebecca Miller-Rice miller.ricer@blr.arkansas.gov

Re: State Insurance Department Arkansas Code § 25-15-216(c) Request to be Excluded from Promulgating Rules for Act 512 of 2025, To Amend the Law Concerning Audits of Healthcare Providers, and to Create the Arkansas Medical Audit Bill of Rights Act.

Dear Senator Dees and Representative Shepherd;

Pursuant to Arkansas Code § 25-15-216(c), the State Insurance Department respectfully requests that it be excluded from the requirements of Arkansas Code § 25-15-216(b)(3)-(5), because it believes that promulgation of a rule to implement Act 512 of 2025 is unnecessary.

Act 512 creates the Arkansas Medical Audit Bill of Rights, which establishes requirements healthcare payors must follow to conduct a legal audit of a healthcare provider. Section One of the Act, Arkansas Code § 23-99-1903(f), requires the Department to promulgate rules for implementation of the Act. The Department believes the Act contains well-defined terms that can be enforced without rulemaking.

The Department requests that the Administrative Rules Subcommittee and Arkansas Legislative Council determine that rulemaking is unnecessary and excuse the Department from having to promulgate a rule for Act 512 of 2025.

Sincerely,

A handwritten signature in blue ink that reads "Crystal Phelps".

Crystal Phelps
Managing Attorney
Arkansas Insurance Department