



February 14, 2020

Senator Bob Hackett
National Council of Insurance Legislators
2317 Route 34 South, Suite 2B
Manasquan, New Jersey 08736

Via e-mail

Re: Draft Model Act Regarding Vision Care Services

Dear Senator Hackett:

AHIP appreciates your leadership on vision care and your sponsorship of the Draft Model Act Regarding Vision Care Services (Draft Model). Our vision care plan members appreciate the opportunity to work with you and other stakeholders to craft a Model Act that will maintain vision care consumer access to the most affordable vision care.

AHIP is the national association whose members provide coverage for health care and related services to hundreds of millions of Americans every day. Through these offerings, we improve and protect the health and financial security of consumers, families, businesses, communities and the nation. We are committed to market-based solutions and public-private partnerships that improve affordability, value, access, and well-being for consumers.

Vision coverage insurance plans play a key role in facilitating consumer access to ongoing and regular vision care services and in keeping vision care affordable. Regular vision care is, of course, key to maintaining good vision and healthy eyes. An attractive and important feature of most vision care plans is access to services and materials at discounted prices.

Your Model Act would guarantee the option of vision care providers to choose whether or not to offer discounts to vision care plan enrollees for non-covered services and materials, while providing for reasonable steps to ensure that enrollees have access to information regarding care costs and options. This strikes an appropriate balance that preserves consumer choice and access to better vision care value. Our key points are summarized below.

Negotiated Vision Care Plan Discounts for Non-Covered Services and Materials Are Good for Consumers.

Vision coverage contract provisions for non-covered service discounts are important to giving plan enrollees access to the best prices and best value in vision care. Consumers are better served when information regarding costs and options is readily available to them.

Negotiated Vision Product Discounts for Non-Covered Services and Materials Also Serve In-Network Providers in an Important Way.

Negotiated vision care discounts are good for in-network providers because vision care plan coverage provides in-network optometrists with an increased volume of patients and customers. Discounts on vision care services and materials help to build plan enrollees' loyalty to their in-network provider. Without access to discounts, consumers are more likely to seek to obtain materials from online sources, bypassing their local eye care professional.

AHIP Supports the Draft Model Act Regarding Vision Care Service and Seeks to Make an Improvement to the Model.

As stated during the NCOIL Winter National Meeting, AHIP supports the Model. Our members are seeking one change to the current draft to simplify the provisions of Section (E) regarding communications to consumers. We propose striking final sentence of Section (E). We believe that inclusion of that sentence would add unnecessary complication to the Model Act.

Again, AHIP and its members appreciate that opportunity to provide comments regarding the Draft Model Act Regarding Vision Care Services.

Sincerely,



Brendan Peppard
Regional Director
State Affairs & Policy