

October 21, 2020

Members of the Health Insurance & Long-Term Care Issues Committee
c/o National Council of Insurance Legislators
2317 Route 34 South, Suite 2B
Manasquan, New Jersey 08736

Re: Draft Model Act Regarding Vision Care Services

Dear Committee Members,

Thank you very much for the opportunity to have organized Optometry represented as part of the conversation during the recent NCOIL Summer Meeting on the proposed Vision Care Services model language. We fully appreciate the impact this type of legislation can ultimately have on the doctor-patient relationship and know that this is a significant issue to Doctors of Optometry in all 50 U.S states and territories. We agree with Senator Hackett that protections in statute are critical and necessary as it relates to vision plan services, but we ultimately disagree with the language presented to you all in its current form.

As optometric leaders in our respective states, speaking for thousands of practicing optometrists impacted daily by vision plans and their actions, the language as introduced ultimately stands to best benefit the plans and not bolster the continuity of patient care.

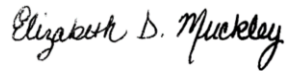
In order to achieve the most beneficial outcome for patients, providers and health plans, we believe model language being considered by this body should be a comprehensive approach, which deals with the many complex issues that have been addressed in the majority of the twenty-three states who have already enacted some form of protection. We appreciate Senator Hackett's leadership in Ohio as well at NCOIL, in an effort to formulate a meaningful bill to all parties, as we know how complex of an effort this continues to be. However, while the efforts in Ohio and Utah have been most laudable, the reality is that we continue to see implementation problems in these states. For that reason, we strongly feel that the best solution for NCOIL is to consider formulating model legislation which is a truly comprehensive plan that embraces finding solutions for the many complex issues that exist between patients, providers and plans. A more comprehensive approach will enable Doctors of Optometry to provide better care for their patients, and an increased patient-provider relationship, is ultimately better for the plans as well.

Working from language found in a minority of states, which remains problematic in practical application, seems counterproductive to creating the sound public policy we anticipate from a respected group like NCOIL.

Thank you all very much for your continued work on this important issue. We stand available and ready to be a resource to you and your committee on this proposed language, alongside of our national organization the American Optometric Association. If you have any questions,

please do not hesitate to reach out to us directly or you may also contact Daniel Carey with the American Optometric Association at dcarey@aoa.org or 703-837-1343.

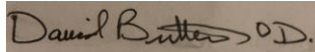
Sincerely,



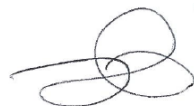
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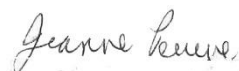
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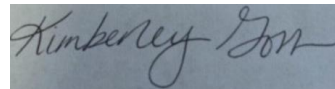
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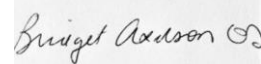
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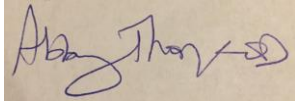
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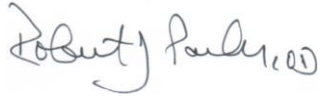
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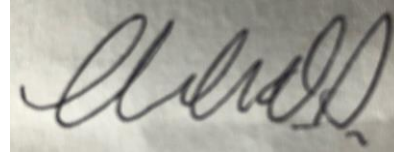
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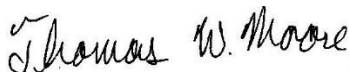
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