The Honorable Sarge Pollock, Chair
NCOIL Health Insurance & Long-Term Care Committee
Kentucky Legislature
Room 416 Capitol Annex
702 Capitol Avenue
Frankfort, KY 40601

Cc: Members of the NCOIL Health Insurance & Long-Term Care Issues Committee

Re: Opposition to the Draft Vision Benefit Model Act

Dear Chairman Pollock and Members of the Committee:

On behalf of MetLife/Versant Health, we would like to take this opportunity to provide additional comments on the proposed Model, Ensuring Access to Eye Care Services and Materials for Patients Through Transparent and Fair Business Practices by Vision Benefit Plans.

MetLife is a longstanding NCOIL member and, together with its affiliate, Versant Health, provide vision benefits to over 29 million members nationwide. As you know, one of the primary benefits of creating consensus driven model language at NCOIL is to streamline state level legislation, which the current draft language fails to accomplish, setting the stage for potential state legislative battles.

While there have been minimal and cosmetic changes, we would like to highlight some remaining areas of concern in this proposed Model.

1. N**o improved consumer experience or benefit exists** for the consumer/patient or employer. In fact, it would remove the ability of doctors to offer additional discounts that may benefit consumers.
2. **Consumer and administrative costs will increase** as a result of increased minimum reimbursements, added administrative burden, and unnecessary documentation.
3. **Additional oversight burden** will be placed on state governments to solve doctor-driven issues where no known consumer complaints exist.
4. **Contracting will become difficult,** forcing providers to recontract constantly and resulting in an administrative burden and a network disruptor with no identified cause and placing the consumer/patient in the middle.

5. **Credentialing will no longer drive engagement** as requiring the execution of a provider agreement before due diligence is performed will result in contracting with providers before they satisfy a National Committee on Quality Assurance level of certification.
6. **This is one-sided legislation** which places the burden of **disclosure and transparency** solely on vision care organizations.

A Balanced Path Forward

We believe there is meaningful common ground that can be achieved, but **we cannot support the current language**.

Vision benefits remain a genuine success story: a largely voluntary coverage chosen by millions of Americans because it delivers meaningful value at modest cost. That success has been driven by competition, negotiated provider relationships, network flexibility, and innovative benefit design.

MetLife, Versant Health, and the Industry remain committed to working with Representative Gordon, Chairman Pollock, and the entire Committee toward a Model that protects consumers while preserving the competition, flexibility, and affordability that have made vision coverage a rare bright spot in health benefits. Please continue to pursue true consensus between both sides as we believe we can reach an agreeable "middle" (e.g. successful Illinois legislation).

Thank you for your leadership and consideration.

Respectfully submitted,



Alan Hirschberg
EVP, Network and Partnerships
MetLife / Versant Health