November 10, 2026

The Honorable Sarge Pollock, Chair
NCOIL Health Insurance and Long-term Care Issues Committee

Dear Chairman Pollock and Members of the Committee:

On behalf of VSP Vision, we write to oppose the Vision Benefits Model Act.

Affordability and Consumer Value Are at Risk

At a time when families, employers, and policymakers are focused on health care affordability, NCOIL should not advance a national policy that risks increasing the costs of vision care.

Today, vision care benefits make routine eye care and eyewear more affordable because plans negotiate provider arrangements and discounts that produce meaningful savings for consumers. The Model Act would restrict important aspects of those arrangements through a combination of government price-setting and new mandates for services and materials, network participation, and provider relationships.

By limiting the tools plans use to negotiate lower prices, the Model Act would raise the cost of delivering vision care benefits. Those elevated costs do not disappear; they get passed to employers and plan sponsors through higher benefit costs and ultimately to consumers through higher premiums, greater out-of-pocket expenses, reduced coverage, or fewer benefit choices.

Consumers purchase vision coverage for predictable, negotiated savings on eye examinations, eyeglasses, and contact lenses. The Model Act puts that value at risk by restricting the very arrangements that help plans deliver savings and value to families.

Significant Concerns Remain Unresolved

The Model Act should not advance while significant concerns about its impact on affordability, access, and the value of vision benefits remain unresolved. Vision care and insurance industry stakeholders have participated in good faith and proposed substantive revisions intended to address unintended consequences of the Model Act for consumers,

employers, plans, and purchasers. Yet most of those recommendations are not reflected in the current draft.

A national model with the potential to reshape the vision care industry warrants a continued, deliberate, and balanced approach. Stakeholder concerns should be fully considered, proposed changes transparently evaluated, and their potential consequences understood before states are encouraged to adopt a new policy model.

For these reasons, VSP respectfully opposes the Model Act in its current form and urges NCOIL to pause this effort until stakeholders can develop an approach that better balances consumer costs, the value of vision benefits, and provider concerns. We thank you and the Committee for your time and thoughtful consideration of these important issues.

Sincerely,

Maureen Yamamoto

Maureen Yamamoto
Director, Government Affairs, VSP Vision