



NATIONAL ASSOCIATION
OF VISION CARE PLANS

Sent via email: lstarr@leg.state.vt.us

April 8, 2016

Representative William J. Lippert Jr.
House Committee on Health Care
115 State Street
Montpelier, Vermont 05602

RE: National Association of Vision Care Plans Opposition to S.215

Dear Chairman Lippert,

I am writing to express the National Association of Vision Care Plans' (NAVCP) opposition to S.215. NAVCP believes that the bill does not do enough to protect consumers when an optometrist or ophthalmologist attempts to send them away from in-network sources, suppliers, and laboratories.

NAVCP's 20 primary member companies manage extensive networks of vision care providers and include vision benefit coverage for **over 149.2 million Americans** including **300,000 Vermont residents**. NAVCP strives to improve quality and efficiency in the delivery of vision care and promotes the value and importance of vision care and vision benefits to both consumers and employers. Our members provide a competitive market to consumers and vision care providers alike, offering a variety of business models so that employers, individual consumers, and vision care providers can select the networks they need.

The current version of S.215 would allow an optometrist or ophthalmologist to send an enrollee to an out-of-network supplier or laboratory if that option is at a lower cost than the in-network option. NAVCP supports finding cost effective options for our enrollees. That is why our members negotiate discounts with in-network sources, suppliers, and laboratories. However, when an optometrist or ophthalmologist sends our enrollees out-of-network, NAVCP's members cannot warrant the quality of the material or services provided. **All plans our members offer in Vermont provide a warranty on the services and materials covered as in-network.**

Accordingly, we believe S.215 should be amended to require eye care providers to inform consumers that the protections afforded them by choosing in-network options may not be available when an optometrist or ophthalmologist sends them out-of-network.

We respectfully submit the proposed amendment below.

(4) A vision care plan shall not limit an optometrist's or ophthalmologist's choice of or relationship with optical laboratories or sources and suppliers of services or materials if:

(A) the source, supplier, or laboratory selected by the optometrist or ophthalmologist offers the services or materials at a lower cost to the

optometrist or ophthalmologist consumer than the source, supplier, or laboratory selected by the vision care plan, and

(B) the optometrist or ophthalmologist notifies the consumer in writing that the source or supplier is out-of-network and shall inform the enrollee of the cost of those services, and

(C) the optometrist or ophthalmologist notifies the consumer in writing that warrantees available from in-network sources may not be available from out-of-network sources, suppliers, or laboratories, and

(D) the optometrist or ophthalmologist notifies the enrollee in writing that in-network sources, suppliers, or laboratories are available from their vision plan.

(f) The Department of Financial Regulation shall enforce the provisions of this section.

Conclusion

NAVCP's members create networks to save our enrollees money as well as to guarantee quality. If an optometrist or ophthalmologist seeks to steer an enrollee away from these negotiated benefits, there must be a requirement on the optometrist or ophthalmologist to notify our enrollees that they make not have access to these benefits otherwise provided by an in-network option.

We would be pleased to work with you to resolve these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Julian Roberts". The signature is fluid and cursive, with a large initial "J" and "R".

Julian Roberts
Executive Director
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