



NATIONAL ASSOCIATION OF VISION CARE PLANS

October 31, 2012

Via Email to markandrews@le.utah.gov

Utah Health System Reform Task Force
Utah State Capitol Complex
House Building, Suite W210
PO Box 145210
Salt Lake City, Utah
84114-5210

RE: Stand-Alone Vision Plan Coverage in the Utah Health Exchange

Dear Senator Niederhauser, Representative Dunnigan, and other Task Force Members:

I am writing to you on behalf of The National Association of Vision Care Plans (NAVCP) to ask that the Task Force allow access to stand-alone vision plans through the Utah Health Exchange. NAVCP is the trade association for the managed vision care industry. We represent the interests of eighteen (18) primary member companies that manage extensive networks of vision care providers and collectively administer vision benefit programs to **more than 119 million Americans**. As the voice for the vision benefits industry, NAVCP's mission is to advocate for consumer access to quality vision care and promote the growth of the vision benefits industry. NAVCP strives to improve overall industry quality and efficiency standards in the delivery of vision care and promotes the value and importance of vision care and vision benefits to both consumers and employers. As a result, we strongly support the inclusion of stand-alone plans alongside comprehensive medical plans in both Individual Market and SHOP exchanges to preserve a popular coverage option used by millions of consumers. Maryland, Massachusetts, Nevada and most recently California have allowed consumers to access stand-alone vision plans through their respective health benefit exchanges, and we believe that the residents of Utah should enjoy the same access once they enroll in an exchange.

Vision benefits should be accessible to both children and adults through both comprehensive plans as well as stand-alone plans. Our research has shown that the conveniences and cost efficiencies of stand-alone vision plans provide better access to vision care than integrated plans alone. In one of our recent studies, NAVCP analyzed information from over 50 million consumers and found that those covered under stand-alone plans were shown to be twice as likely to utilize their vision benefits as consumers who accessed vision care solely through benefits integrated into a medical plan. Unsurprisingly, more than 90 percent of dental and vision benefits in America today are provided through stand-alone plans.¹ At the core of the ACA are the goals of providing Americans with improved access to cost-effective care, more competitive, transparent choices, and better outcomes. Stand-alone vision plans provide all of the above.

¹ NADP/DDPA 2009 Enrollment Report. National Association of Dental Plans. Press Release Dated September 4, 2009.

Not allowing stand-alone plans in the exchange will disrupt the coverage many consumers enjoy. Children will be removed from their parents' existing vision coverage and required to obtain their vision benefits coverage separately. Any adult who currently has employer-provided stand-alone vision coverage would be unable to maintain their existing coverage if their employer chooses to move their employees into the Exchange. By allowing access to vision services through stand-alone as well as comprehensive medical plans, Utah will avoid this disruption in coverage and will ensure that no one be forced to give up their existing coverage.

Finally, access to the valuable specialized care provided by stand-alone vision plans is key to the prevention of chronic conditions and reduces downstream tertiary care costs for adults and children alike. As Utah consumers seek to coordinate care for their families, they should have access to options that will allow them the best price, benefits, access, services, and quality for vision services.

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
National Association of Vision Care Plans
222 S. First Street
Suite 303
Louisville, KY 40202
502.403.1122