



Nevada Optometric Association
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September 24, 2012

Commissioner Scott J. Kipper

Division of Insurance

1818 E. College Pkwy., Suite 103

Carson City, NV 89706

Dear Commissioner Kipper:

The Silver State Health Insurance Exchange Board has recommended three benchmark plans for your review and selection. For all of these plans, the essential health benefit for pediatric vision covers an annual comprehensive exam but does not offer any materials or eyewear benefits such as corrective lenses and frames. While we fully support the inclusion of an annual exam, the vision benefit is deficient as it lacks any coverage for corrective eyewear.

We believe offering an eye exam only without materials does not meet the intent of CMS to offer a meaningful vision benefit for children. In a December, 2011 CMS bulletin (see attached question 5) CMS describes special rules to ensure meaningful benefits for pediatric vision, dental care and rehabilitative services. For pediatric vision, CMS states "For pediatric vision care, we are considering proposing that the State would supplement the benchmark plan with the benefits covered in the FEDVIP vision plan with the highest enrollment."

For all of the recommended plans (HPN POS C-XV, NV HHP 25 HMO PEBP, and NV PEBP PY2012 HDHP) vision coverage is included either as a rider or in the plan as an annual comprehensive examination with no materials. For this reason we strongly urge you to select the FEDVIP vision plan as the supplement vision benefit for the children's essential benefit.

Respectfully,

Gail Conkey

Mark Lee OD

Executive Director, Nevada Optometric Association

Board Member and Third Party Chair

Enclosures

cc: Cliff King, Life and Health Section Chief

For additional background and review of all ten benchmark plans we include the following:

For pediatric vision care, HHS intends to propose the plan must supplement with the benefits covered by the Federal Employees Dental and Vision Insurance Program (FEDVIP) with the largest enrollment. Below you will see a complete review of the vision services for all of the plans under consideration.

On July 3, 2012, CMS released a list of the FEDVIP oral and vision plans with the highest enrollment that could be used as benchmark plans. For vision care, the benchmark plan with the highest enrollment is FEP BlueVision – High. A copy of the July 3, 2012 CMS bulletin is attached for your reference.

The cost of providing a children's vision benefit that includes an annual comprehensive eye examination and materials is very affordable. Data obtained by the American Optometric Association from a large private insurer in the northwest showed the cost of providing a children's vision benefit of just \$0.65 per member per month spread among the entire insured population.

1. **Health Plan of Nevada Point-of-Service**
Annual vision examination, no materials provided through rider
2. **Aetna PPO**
Vision exam every 24 months, no materials
3. **Anthem PPO**
Vision examination and corrective lens benefit every year provided through rider
4. **Nevada PEBP High-Deductible Health Plan**
Annual vision examination with material benefit only one time after cataract surgery
5. **Nevada PEBP Health Plan of Nevada HMO**
Vision examination and corrective lens benefit every year provided through rider
6. **Nevada PEBP Hometown Health Plan HMO**
Annual vision examination, no materials (discount only) provided through rider
7. **Government Employees Health Association**
Vision examination and corrective lens benefit every year provided through rider (FEDVIP)
8. **FEHBP/ Blue Cross-Blue Shield Standard**
Vision examination and corrective lens benefit every year provided through rider (FEDVIP)
9. **FEHBP/ Blue Cross-Blue Shield Basic**
Vision examination and corrective lens benefit every year provided through rider (FEDVIP)
10. **Clark County School District/Health Plan of Nevada HMO**
No vision benefit either in plan or through a rider, would need to supplement