



Nevada Optometric Association  
P.O. Box 3022  
Reno, NV 89505  
Office: 702-220-7444

To: Commissioner Scott J. Kipper  
From: Nevada Optometric Association  
Date: June 2, 2015  
Re: Written Public Comment - Pediatric Vision Care and the Selection of Nevada's Essential Health Benefits Plan (EHB)

The Nevada Optometric Association (NOA) submits the following comments to Commissioner Kipper regarding the state's efforts to reselect a benchmark plan that will serve as a baseline for the delivery of essential health benefits (EHB) under the Affordable Care Act beginning in 2017.

The current Nevada EHB benchmark plan specifies the usage of the Pediatric FEDVIP (Federal Employees Dental and Vision Insurance Program) program with the highest enrollment and we recommend the continuation of this same vision supplement plan.

The FEDVIP plan ensures that children are able to receive the care that is necessary to guarantee good vision health and at a minimum gives coverage of the following items and services when furnished to an individual under 22 years of age:

- One comprehensive vision and eye health examination by an optometrist or ophthalmologist during each year; and
- Diagnosis and treatment of diseases, refractive errors, binocular disorders and injuries of the eye, adnexa and visual system, with treatment to include, but not be limited to, the use of corrective devices, materials and other therapeutic procedures.

#### Proposed EHB Benchmark Plans

##### Small Group Plans:

1. Sierra Health and Life: SHL Solutions PPO Platinum  
Support – We endorse this plan as it includes a yearly routine eye exam and 1 pair of eye glasses for children
2. Health Plan of Nevada: HPN Solutions HMO Platinum  
Support – We endorse this plan as it includes a yearly routine eye exam and 1 pair of eye glasses for children

3. Health Plan of Nevada: HPN Solutions POS Gold

Support – We endorse this plan as it includes a yearly routine eye exam and 1 pair of eye glasses for children

State Employee Plans:

1. Nevada PEBP: Self-funded PPO Plan

Recommendation – only a routine eye exam is covered excluding any corrective materials. The frequency of this exam is also not specified. For these reasons, we recommend the FEDVIP supplement plan

2. Nevada PEBP: Health Plan of Nevada HMO

Recommendation – We recommend the FEDVIP supplement plan

3. Nevada PEBP: Hometown Health Plan HMO

Recommendation – We recommend the FEDVIP supplement plan

Largest HMO Plan:

1. HPN: Clark County School District-HPN Solutions HMO

Recommendation – We recommend the FEDVIP supplement plan

Federal Employee Plans:

1. GEHA: Benefit Plan 2014

Recommendation – We recommend the FEDVIP supplement plan

2. FEHBP: Blue Cross-Blue Shield Standard

Recommendation – We recommend the FEDVIP supplement plan

3. FEHBP: Blue Cross-Blue Shield Basic

Recommendation – We recommend the FEDVIP supplement plan

We also would like to emphasize the importance of a yearly comprehensive vision exam. While well child care may include vision screening, such screening is not a substitute for more comprehensive eye examinations and related diagnosis and treatment services, especially since a recent study suggests that much of what is recommended is not accomplished in well-child care visits where mere seconds are

devoted to the visual system.<sup>1</sup> Further, a June 2009 report of the National Commission on Vision and Health found that evidence from past studies shows that comprehensive eye exams for children by an optometrist or ophthalmologist are highly effective in detecting vision conditions.<sup>2</sup>

Taking all of the above into account, the NOA believes that the proposed pediatric vision coverage that includes one comprehensive vision and eye health examination by an optometrist or ophthalmologist during each year and diagnosis and treatment including the use of corrective devices and other therapeutic procedures properly balances the various Congressional directives regarding essential health benefits.

In addition, the proposed coverage would help ensure that children covered by qualified health plans and other plans subject to essential health benefit requirements have access to eye care services that could have a significant impact on their long-term health and welfare and their ability to contribute meaningfully to society at large.

Thank you for the opportunity to provide our written comments. We look forward to working with you to ensure that the children of our state receive the high quality healthcare they need and deserve. Please feel free to contact our office for additional details and assistance.

---

<sup>1</sup> See “Delivery of Well-Child Care: A Look Inside the Door,” C. Norlin, M.A. Crawford, C.T. Bell, X. Sheng, and M.T. Stein. *Academic Pediatrics*, 11(1):18-26, 2011.

<sup>2</sup> See “Building a Comprehensive Child Vision Care System.” A report of the National Commission on Vision and Health, Prepared by Abt Associates, Inc., June 2009, p. 1.