

## Covered California (Revised) Vision Proposal

September 11, 2013

### Background

The vision care industry and California consumer groups are united around a concern that vision care for adults is not being offered through Covered California (CC). The following creative proposal is designed to meet this need. An eye examination provides much more than only a needed vision correction – it is an essential connection to the overall health and wellness of an individual. Eye examinations can show signs of diabetes, high cholesterol, high blood pressure and other systemic, high-cost conditions. It is also a documented fact that Californians see their eye doctor much more frequently than they have a medical check-up. So, the opportunity for the early detection of chronic disease is significant through this channel. Early detection not only saves money, but it can have a substantial impact on one's life.

Covered California (CC) Exchange staff held a conference call with VSP on April 16, 2013 to discuss the *CMS/FAQ on the reuse of Exchanges for Ancillary products* issued on March 29<sup>th</sup>, 2013. Exchange personnel indicated an interest in reviewing a VSP proposal to provide non-Essential Health Benefit (EHB) vision services and benefits in compliance with the *CMS/FAQ*.

Meeting was held with CC Exchange staff on May 21, 2013 to discuss a proposal to enable VSP and other Vision Plans to provide vision care to CC Exchange members. Options were discussed and VSP was asked to provide an updated proposal on behalf of the vision care industry.

Meeting was held with CC senior Exchange staff to vet a revised vision proposal on June 10<sup>th</sup>, 2013. Present were Consumer Groups currently engaged with CC. They included Consumers Union; Western Center on Law and Poverty, Health Access and the California Pan-Ethnic Health Network. Consumer groups confirmed concern about the lack of adult vision coverage, even on an optional basis through CC.

Meeting was held July 31, 2013 with Director Ms. Krause of the California Office of the Patient Advocate (OPA) to discuss the potential involvement of this State Agency in providing education on vision care on behalf of CC.

On August 9, 2013 the National Association of Vision Care Plans (NAVCP) agreed in writing (attached) to host the landing page that directs CC enrollees to available vision plans at no cost to CC. Additionally, NAVCP is willing to help ensure that participating vision plans are state-licensed and have obtained state approval of products to be offered through this delivery mechanism.

Meeting was held September 9, 2013 with CC senior Exchange staff, OPA, DMHC, NAVCP and CDI to discuss latest written proposal draft in anticipation of presentation to the CC Plan Management Advisory Committee this Wednesday September 11, 2013. Two go-forward options were discussed. The first was utilizing NAVCP hosting the landing page; the second option was developing an OPA webpage to present educational information on vision care, including resources for Californians interested in buying vision coverage in the form of links to public websites for each licensed and certificate holding vision plan and insurer.

## Related Developments

1. The *Connect for Health* Colorado Exchange Board of Directors voted favorably at their June 10, 2013 meeting to allow Vision Plans to provide Supplemental vision care for adults. That initial vote was formally ratified on August 12, 2013. Upon conclusion of the Colorado Exchange enrollment process - effective October 1<sup>st</sup>, 2013, Exchange enrollees in Colorado may enroll in extended vision coverage that begins January 1<sup>st</sup>, 2014. The approach in Colorado is similar to that desired for CC. However, the Colorado Exchange wanted to avoid a middleman solution that could add to cost.
2. The National Association of Vision Care Plans (NAVCP) has agreed to pay for and host a landing page as well as help monitor the vision plans that will participate in the Supplemental Vision offerings defined in this proposal. Additionally, NAVCP is willing to specify common, simple-to-communicate benefits required of the vision vendors. Every major vision plan is a member of the NAVCP.

The NAVCP exists to:

- a. Speak with a unified voice in regulatory arenas
  - b. Provide a forum and centralized source of information to the public
  - c. Improve quality in Managed Vision Care
  - d. Provide input and perspective in credentialing and the development of standards
  - e. Focus on bringing more technology to the Managed Vision Care industry
3. The California Office of the Patient Advocate (OPA) on September 9, 2013 supported further discussion of developing an OPA-hosted webpage as an option to provide Californians with vision care coverage information. . Director Krause described some specific parameters:
    - a. The OPA charter supports providing education and referrals or resources to all Californians, regardless of their insurance status.
    - b. After providing vision education information OPA has to offer consumers resources where to find vision coverage but could not refer to the NAVCP site as proposed.Possible components of the OPA resource listing are:
    - i. "Finding Coverage" or "Where can I go to buy vision coverage?"
    - ii. List of plans and insurers has to be to each licensed and certificate holding vision plan and insurer per regulator listings—no discretion or criteria who to include on the part of OPA as the manager of the webpage.
      1. Strict disclosure and explanation of the plans/insurers listed would be required to ensure OPA is not selecting, certifying or otherwise representing the standing of the plan/insurer other than a current license/certificate to do business in California (same as current regulator lists)
    - iii. Links to all licensed/certificate holding plans and insurers could be separated by Individual and Group (Employer) to aid consumers but no product design, pricing, marketing, etc. would be at the discretion of OPA in managing the webpage.
    - iv. Consumers use the links to navigate directly to the plan/insurer websites to consider purchasing adult vision coverage

**The updated proposal for CC utilizing option # 1 - NAVCP in the above capacity and option #2 – OPA in the above capacity, follows:**

## **Objectives**

- The vision insurance solution outlined in this updated proposal to CC seeks to meet the following objectives:
  - Provide a link from the CC website for the purpose of informing CC customers on the availability of quality vision insurance options available for individual purchase.
  - Work with California Consumer groups to help publicize the vision offering utilizing this unique delivery channel.
  - The offering will be pro-consumer and pro-competition. Sole source contracting is not being considered anywhere in this proposal.
  - No cost to CC
  - Execute with simplicity for:
    - Consumers
    - State of California
    - Vision insurance carriers
  - Create a consumer purchase experience that is compatible with the CC experience.
  - Provide speedy consumer access to proven, licensed entities utilizing an Industry Authority (NAVCP), to disseminate educational and enrollment information which allows consumers or employers the ability to transact the purchase of vision care supplemental offerings enabled through CC. Speedy access via a State Office (OPA) would be limited to educational information and referral resources but not enrollment.
  - The primary role of interested California consumer groups and other stakeholders in this arrangement is to provide information on the vision care supplemental offering enabled through CC.
  - The primary role of NAVCP (Option #1) is agreement to pay for and host the landing page as well as help ensure criteria for the vision plans that will participate in the Supplemental Vision offerings defined in this proposal. Additionally, NAVCP is willing to set specific, common, simple-to-communicate benefits required of the vision vendors.
  - The primary role of OPA (Option #2) is agreement to host the landing page, provide educational information and make referral for more information.

## Proposal

VSP and the Vision Plan industry seek approval of the CC Plan Management Advisory Committee and ultimately the CC Board of Directors to authorize the simple provision of a utility to link Exchange participants with vision vendors as part of the contiguous CC enrollment experience. We hereby propose that interested California consumer groups and other stakeholders provide educational information on the availability of a vision care supplemental offering enabled through CC.

Option #1 - NAVCP agrees to pay for and host the landing page to be linked from CC. Such linkage will enable prospective enrollees to arrive at a page that will list details of the common adult vision care offerings and allow consumers to link through directly to the vision carriers. Upon the successful conclusion of non-EHB/Supplemental vision enrollment, the participant will be linked back to the CC website.

Option #2 – OPA agrees to host a webpage, provide educational information and make consumer/employer referrals for more information, without discretion as to the plan or insurer, or products. Additionally, OPA agrees only under the condition of the criteria in the above section; titled – “Related Developments” which include further detail on the content of proposed webpage before agreement to proceed.

The non-EHB/Supplemental offering of said vision services and benefits will be at no cost to CC and with little or no administrative impact. VSP and the Vision Plan industry understand that CC participants who select non-EHB/Supplemental coverage will not receive federal subsidies and will enter into a private transaction for individual vision coverage with the vision carrier, and these two caveats will be made conspicuously clear to all consumers, as is required under the CMS FAQs.

## Recommendation for Vision Insurance Solution

- A direct link from CC website to a website hosted by the NAVCP or OPA will be provided to site users connecting them to a vision marketplace featuring carriers offering individual or group vision insurance in California
- In Option #1 - The vision marketplace will be constructed and managed by NAVCP with vision industry assistance from NAVCP member organizations.
  - Marketplace will be a vision-only offering (no access to Health, Dental, etc.), which will include plan information and will enable purchase functionality
  - Carriers must meet requirements to be allowed to sell their plan(s) in the marketplace.  
Sample requirements:
    - Licensed by the State of California to sell approved vision insurance to individuals or group coverage in the State of California
    - Have an established web presence
    - Specialty health geographic access as required under California law
    - Have multi-lingual capabilities, as required under California law
    - Other requirements as desired/ determined by CC

- In Option #2 – OPA is willing to work with stakeholders, and vision plans to begin developing a webpage subject to the above conditions.

### **Why involve consumer groups?**

- Consumer groups are a natural advocate for CC participants and could easily provide guidance on the availability of adult vision care in the marketplace.
- Consumer groups already draw consumers to their websites and often provide outreach materials with pertinent information, tools and details including participant’s rights and benefits of the Affordable Care Act.
- Consumer groups already offer health information and education.

### **Why Option #1 - NAVCP?**

- NAVCP is the largest vision care industry association in the nation.
  - NAVCP represents the vision plan industry in the marketplace
  - All major vision plans belong to NAVCP
  - 11 NAVCP member vision plans operate in California
- NAVCP exists to:
  - Speak with a unified voice in regulatory arenas
  - Provide a forum and centralized source of information to the public
  - Improve quality in Managed Vision Care
  - Provide input and perspective in credentialing and the development of standards
  - Focus on bringing more technology to the Managed Vision Care industry
- Their charter allows them to provide the requested functionality and capability for the task at hand.
- NAVCP is a logical partner for the task at hand and meets the CMS and CC requirements for accepting the linkage from CC and hosting this functionality.

### **Why Option #2 - OPA?**

- OPA advocates for consumers and could easily provide guidance on the availability of adult vision care.
- OPA draws consumers to their existing website with pertinent information, tools and details the consumer rights and benefits of the Affordable Care Act
- OPA offers consumers health care information and education

## Option #1 - NAVCP hosting the landing page

### Description of Customer/transaction flow (see diagram below)

- User clicks link for vision insurance marketplace on CC website.
- Link lands user on NAVCP landing page that welcomes CC customer.
  - NAVCP links directly to the carriers' websites to contract for individual vision insurance
  - User can get a quote on available plans or browse information about vision insurance and the importance of one's eye health
- User selects plan, provides enrollment and payment info.
- Carrier loads subscriber into their systems:
  - Sends new subscriber their plan welcome kit

## Covered California - Vision Integration Model

### Role of related websites

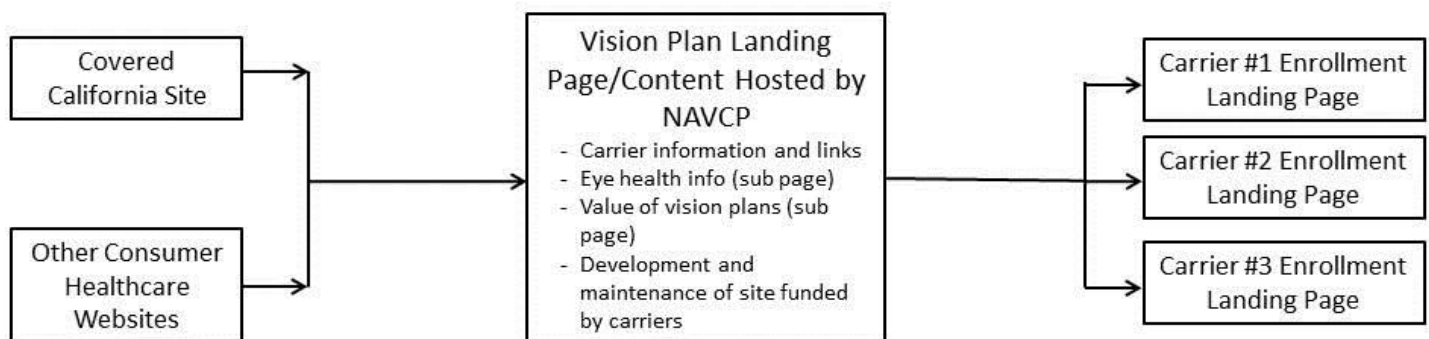
- Point consumers via links to vision care insurance marketplace for CA consumers
- Provide vision care content (where possible)

### NAVCP Role

- Establish carrier participation criteria for vision plan landing page; screen carriers for participation
- Host/maintain vision marketplace site per direction of CC Exchange, DOI and DMHC
- Screen vision carriers for inclusion per inclusion criteria

### Carrier Role

- Enroll subscriber
- Process payment
- Fulfill subscriber materials
- Re-enroll subscribers
- 3 carriers shown in model as example only, actual number of carriers could be larger or smaller



## Option #2 - OPA hosting the landing page

### Description of Customer/transaction flow (see diagram below)

- CC website prompts users as to whether they would like information about vision care for adults. If so, user would be linked to vision care page on the OPA website/landing page.
- Link lands user on OPA landing page that welcomes CC customer.
  - What is vision?...and the Importance of vision care content is provided by OPA
  - User is asked; What do I do now? Website prompts user to declare if they are an individual or employer.
- User is presented with list of all licensed Individual (or Group) vision carriers in good standing.
- User selects plan and is directed to the vision carrier website they chose, carrier website provides enrollment and payment info.
- Carrier loads subscriber into their systems:
  - Sends new subscriber their plan welcome kit

## Covered California - Vision Integration Model

### Role of Covered CA Site

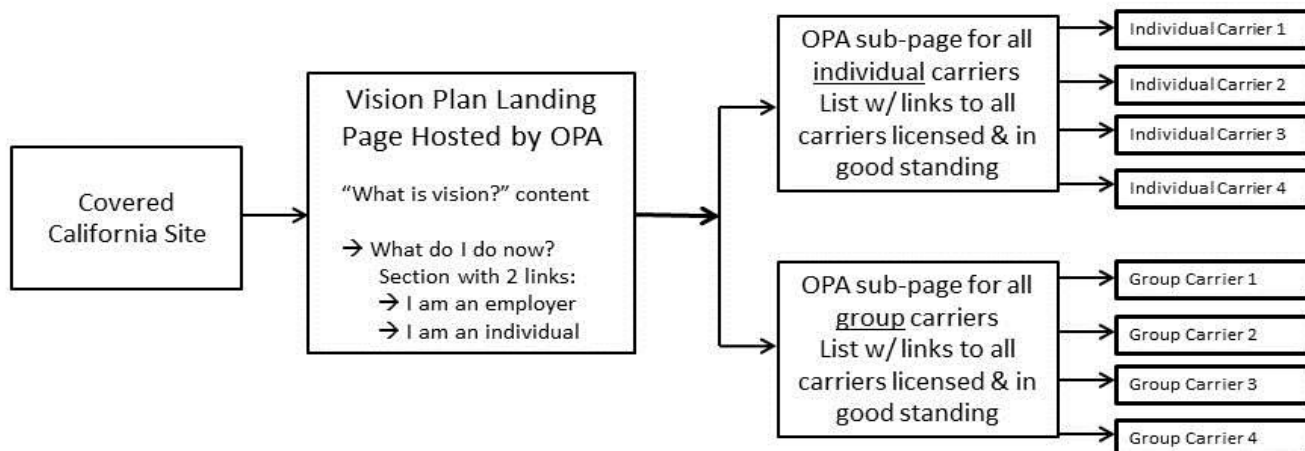
- Covered CA site prompts users at the conclusion of their health care purchase as to whether they would like information about vision care for adults; provides link to vision care page on OPA site.

### OPA Role

- Host landing page with vision care content and links to sub-pages
- Sub-pages contain lists of all carriers licensed and in good standing, and includes links to the carriers' websites

### Carrier Role

- Enroll subscriber
- Process payment
- Fulfill subscriber materials
- Re-enroll subscribers



## Administrative Responsibilities

### **Covered California:**

- ✓ Provides web and telephone links to NAVCP (or OPA) landing page (personalized or co-branded for CC)

### **Consumer groups (and other communication partners):**

- ✓ Directs interested prospective adult vision care enrollees to the platform partner (NAVCP or OPA)
- ✓ Provides educational materials on the importance of obtaining vision care on a regular basis

### **NAVCP (Option #1 platform partner):**

- ✓ Provides user with easy-to-understand, simple plan information from each carrier via their hosted platform
- ✓ Helps ensure vendor participation criteria
- ✓ Links to carriers for consumers to obtain enrollment and transact payment for coverage

### **OPA (Option #2 platform partner):**

- ✓ Provides educational materials on the importance of obtaining vision care on a regular basis
- ✓ Refers interested prospective adult vision care enrollees to a listing of licensed individual or group vision carriers in good standing

### **Carriers:**

- ✓ Provide easy online enrollment for consumers that:
  - ✓ Collects subscriber and payment information
- ✓ Provide CC, if desired, with monthly report of link activity (clicks/conversions/etc.)
- ✓ Process subscriber payment (in annual and/or monthly payments)
- ✓ Load subscriber information; fulfill new subscriber information and on-going member communications
- ✓ Provides CC with monthly count of new members enrolled (if required)
- ✓ Provides customer service to handle questions from prospective or existing members, handles claims issues
- ✓ Sends renewal notices to subscribers
- ✓ Processes renewal payments (credit card, bank draft, etc.)

## Next Steps

- Plan Management Advisory Committee approval of one of the options in this proposal on September 11, 2013.
- CC Board of Directors approval at the September 19, 2013 Board of Directors meeting, to provide access via website link for its customers to a vision insurance marketplace for California residents.
- Identify location of link(s) in CC website.



### **Option #1 – NAVCP hosting landing page**

- NAVCP to build out the vision market place landing page in advance of October 1, 2013 with assistance from the vision industry.
- NAVCP to set common, simple-to-communicate benefit levels and vendor criteria for the vision plans.
- NAVCP to engage vision carriers to participate on their hosted platform in California.

### **Option #2 – OPA hosting landing page**

- OPA to build out the education and information landing page in advance of October 1, 2013 with assistance from the vision industry.
- OPA to build and post sub-pages listing licensed Individual and Group vision carriers in good standing with assistance from DMHC/CDI and the vision industry.

### **Target Implementation Date**

- Under this proposal, a vision marketplace would be operational by October 1, 2013

August 19, 2013

Peter Lee  
Executive Director  
California Health Benefit Exchange (Covered California)  
560 J. Street, Suite 290  
Sacramento, California 95814

Dear Mr. Lee:

The National Association of Vision Care Plans (NAVCP) has reviewed the Covered California (CC) revised Vision Proposal dated 8/12/13, and I'm pleased to inform you that NAVCP is able and willing to meet its terms. ***Specifically, NAVCP will host a website linked to the CC website for the purpose of educating CC customers on the availability of quality vision insurance options available for individual purchase.*** As the largest national vision care industry organization including several California-based member organizations and other members covering eye care for millions of Californians, NAVCP is in an unparalleled position to serve California consumers in this capacity. We are fully prepared to launch the site for an October 1, 2013 rollout while meeting CC's site specifications including:

- Vision-exclusive marketplace (no access to Health, Dental, etc.) which details plan information and houses purchase functionality
- Listed Carriers will be vetted by NAVCP to ensure standards are met including:
  - Licensed by the State of California to sell approved vision insurance to individuals in the State of California
  - Carrier must generate a minimum annual premium revenue and/or a minimum net asset threshold, to ensure all carriers are well established with a proven model for providing vision insurance
  - Have an established web presence
  - Specialty health geographic access in California
  - Have multi-lingual capabilities, as required
  - Other requirements as desired/ determined by CC

We look forward to partnering with CC in this endeavor to deliver seamless, quality eye care to Californians. Should you have any questions or wish to discuss in further detail, please don't hesitate to contact me at 404/634-8911 or e-mail at [jroberts@navcp.com](mailto:jroberts@navcp.com).

Best Regards,



Julian Roberts  
NAVCP Executive Director