



May 23, 2012

Board of Directors
Colorado Health Benefit Exchange
3773 Cherry Creek Drive North, Suite 1025
Denver, Colorado 80209

Re: Statement regarding inclusion of supplemental benefit plans within COHBE, specifically vision care plans

Dear Ladies and Gentlemen of the Board:

Colorado Eye Care Specialists IPA welcomes the opportunity to comment regarding the issue of offering supplemental benefit plans within COHBE and, more specifically, the perspective in including vision care plans. It is our recommendation that COHBE approve the sale of supplemental benefit plans based on the following reasons:

1. As an affordable means of accessing a primary entry point to medical care.

Most health insurance plans do not cover routine vision care particularly comprehensive eye-health examinations. As health care providers, we understand the importance of our patients having access to quality medical care particularly those professions that tend to be entry points into the medical system as is optometry and ophthalmology. A routine visit to an optometrist frequently results in early diagnosis of medical conditions such as diabetes and hypertension. Studies have shown that there are 3.6 eye exams to every adult physical¹, leading one to conclude that serious medical conditions are more likely to be identified before symptoms manifest during a routine eye visit.

2. Early diagnosis reduces medical claim costs.

When a serious medical condition is diagnosed before symptoms manifest, it is only logical to assume that medical claim costs will go down. A study conducted by Essilor USA in 2009 illustrated a dramatic 26.7% reduction in overall medical claims and 48.4% reduction of in-patient hospitalization costs when diabetic and hypertension patients were diagnosed early and received annual comprehensive eye-health examinations.

3. Provide affordable access to medical devices such as spectacle lenses and contact lenses.

Medical plans that include vision benefits typically do not provide materials benefits or, if they do, it is simply a discount on materials although contact lenses and spectacle lenses are, technically, medical devices. Through supplemental benefit plans like vision, consumers can purchase plans that will provide affordable access to these products.

4. Support of the free-enterprise purchasing marketplace.

As providers, we see many vision plans that are aligned with the major medical plan. These tend to be low cost/low benefit plans that are viewed as added-value benefits. By allowing stand-alone vision plans to be sold through COHBE, you are ensuring access to vision plans that are more comprehensive and the choice of individuals and employers.

5. Increase COHBE's market competitiveness.

By offering a variety of supplemental benefit plans, including vision, COHBE will be in a position to compete stronger in the benefits arena. With consolidating invoicing, and providing a one-stop shopping experience, consumers – including individuals and groups – will be more inclined to purchase all of their benefit programs within COHBE.

Additionally, as COHBE moves forward in this process, it is our desire to find a more effective integration of medical care. It is essential that medical providers of all disciplines are able to treat patients for both medical and routine care; and when routine care results in a medical diagnosis, the transition between providers is seamless to the patient and provider. COHBE's systems platform (in development) could provide the solution giving you the leading edge in the integration of patient care with electronic information exchange, billing and coding. With COHBE as the conduit for two non-related plans to share information, consolidate care, and coordinate coverage, COHBE would attain an advantage over the traditional benefits marketplace.

In conclusion, Colorado Eye Care Specialists IPA supports the sale of supplemental benefit plans in the exchange as a means to bridge the gap from where traditional medical plans leave off, provide access to medical entry points such as optometry, and provide consumer choices.

Should you have any questions, please do not hesitate to contact us.

Sincerely

Mary Freitag, O.D.
President

Denise O'Malley
Sales Director

ⁱ U.S. Department of Health – National Statistics Report #8, August 6, 2008