



Frank Swedlove  
President and CEO

October 1, 2015

Dr. Amy Robinson, Chairperson  
Unregulated Dispensing Working Group of New Brunswick  
New Brunswick Association of Optometrists  
490 Gibson Street, Unit 1  
Fredericton, NB E3A 4E9

Dear Dr. Robinson,

Thank you for your letter dated September 21, 2015 to Donald Guloien. As President and CEO of the CLHIA, I am pleased to respond to your letter.

To provide you with some background on vision care coverage offered by private health plans, it is important to note that coverage will vary depending on the plan design that is chosen by the plan sponsor (the employer). Each plan sponsor will design their plan with the goal of providing attractive benefits in order to attract and retain talent, while also ensuring the sustainability of their benefit plans from a financial perspective. Increasingly, given the costs of eyewear, we are seeing a trend towards plan sponsors introducing maximums and co-payments on this benefit. As a result, individuals are seeing increasing out-of-pocket costs when purchasing eyewear. This may result in plan members seeking lower cost options in the market, such as purchasing eyewear over the internet. As well, the convenience and growing ease with shopping on-line may also be a driver.

Most benefit plans will leave the choice of provider to the plan member and will not specifically exclude certain providers such as those selling over the internet. It is our understanding that regulations in the province of New Brunswick are intended to regulate practitioners within the province and do not regulate the actions of the consumer. Eye wear purchased through the

Canadian Life and Health Insurance Association  
79 Wellington St. West, Suite 2300  
P.O. Box 99, TD South Tower  
Toronto, Ontario M5K 1G8  
416-777-2221 [www.clhia.ca](http://www.clhia.ca)

Association canadienne des compagnies d'assurances de  
personnes  
79, rue Wellington Ouest, bureau 2300  
CP 99, TD South Tower  
Toronto (Ontario) M5K 1G8  
416-777-2221 [www.accap.ca](http://www.accap.ca)

internet appear to be governed by regulations pertinent to the jurisdiction where the eye wear is fabricated and shipped. As such there do not appear to be any legal restrictions prohibiting a New Brunswicker from purchasing eye wear over the internet or outside the province. In our view our current approach to managing this benefit respects the consumer's choice and meets the needs of both plan members and plan sponsors.

You have raised the issue of fraudulent claims arising from eye wear sales over the internet. Our members routinely audit claims and have processes in place to mitigate the risk that you raise.

I hope that this explains the position of the industry with respect to regulation, provider and consumer choice in the area of eye wear.

Sincerely,

*Original signed by*

Frank Swedlove