



AMERICAN OPTOMETRIC ASSOCIATION

Barbara L. Horn, O.D.
AOA President

December 19, 2019

Attorney General William Barr
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Dear Attorney General Barr:

On behalf of the American Optometric Association (AOA), our members, and the patients for which our members provide care, I am writing to report the dangerously deficient business practices of Davis Vision Incorporated (Davis Vision), a subsidiary of Versant Health Holdco, Inc. The AOA represents approximately 44,000 doctors of optometry and optometry students, as well as paraoptometric assistants and technicians. Our members are privileged to serve the eye care needs of the public and are entrusted by society to do so in a professional and ethical manner. As described in more detail below, the way in which Davis Vision has been operating makes it extremely difficult for doctors of optometry and their staffs to serve their patients whose vision benefits are covered by Davis Vision, and for patients, many of which are federal and state government employees, to receive the vision correcting materials they need. It comes down to bad faith on the part of Davis Vision and it not being able to handle the volume of lives that it has contracted with doctors of optometry to serve.

AOA members have reported waiting on hold to speak with a Davis Vision representative for hours at a time (too often in excess of seven hours, with some doctors reporting even longer waits), only to be disconnected. When they are fortunate enough to be connected to a representative, many members have reported speaking with someone who is unable to help them with the issue at hand, whether that be a benefit verification or to discuss a problem with claims processing through Davis Vision's online portal. These hold times are unacceptable and take away from time that would otherwise be spent on patient care.

Aside from the frustration the long wait times cause, the more concerning aspect is that it is the patient who suffers. A patient in need of eyeglasses or other vision correction materials needs to receive them as quickly as possible. Because of the long wait times, patients have to wait days or weeks longer than necessary to receive their eyeglasses. Further, under the contracts these doctors have with Davis Vision, many doctors cannot utilize a different lab to fulfill their patient's needs. Unless operating in a state with a law against requiring use of certain labs (i.e., "lab choice"), the doctors must process the Davis Vision patients through its mandated lab, Essilor. Particularly in these instances, the patient is held hostage by Davis Vision's incompetence because the doctor cannot send the order to a different lab to process the order in a timely way.

In addition to the long call wait times, several of our member doctors have reported issues with Davis Vision's online portal when attempting to process a patient's claim. It simply is not functional and is forcing these doctors and their staffs to resort to calling Davis Vision, which puts them back into the cycle of hours long wait times. Some offices have reverted to paper claims to avoid the online portal altogether, which also increases the patient's wait.

In short, the doctors that contract with Davis Vision have their hands tied. Whether they call, attempt to use the online portal, or submit claims on paper, their patients are the ones truly on hold, suffering the inexcusable delay in receiving their needed eyeglasses or other vision correction materials. I ask that you investigate the way that Davis Vision operates its business and hold it accountable to the patients that it claims to serve.

Please contact Rodney Peele, Esq., Director of AOA's Third Party Center, at rpeele@aoa.org if you have any questions on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara L. Horn, O.D.", written in a cursive style.

Barbara L. Horn, O.D.
AOA President