



1401 W. Capitol, Ste. 247
Little Rock, AR 72201

arkansasoptometric.org



aroa@arkansasoptometric.org

p. 501-661-7675

f. 501-661-7675

**2025-2026
Board of Directors**

President

Julie M. Dolven, O.D.

President-Elect

Kathryn L. Brown, O.D.

Vice-President

Allison N. Hall, O.D.

Secretary/Treasurer

Justin R. Beavers, O.D.

Immediate Past President

Alex C. Bell, O.D.

Directors:

Barrett L. Brown, O.D.

Zachary R. Burroughs, O.D.

Christen J. Coats, O.D.

Shane F. Laster, O.D.

Sarah S. Lunsford, O.D.

Christopher A. Tollett, O.D.

April 2, 2026

Ms. Sara Farris
Arkansas Insurance Department
1 Commerce Way, Suite 102
Little Rock, AR 72202

RE: Proposed Amended Rule 23 CAR pt 142, "Vision Care Plan Coverage,"

Ms. Farris:

The Arkansas Optometric Association respectfully submits these written comments strongly supporting Proposed Amended Rule 23 CAR pt 142 implementing Act 142 of 2025.

Act 142 was overwhelmingly approved by the Arkansas General Assembly and represents a clear legislative directive to strengthen the Vision Care Plan Act of 2015 and address ongoing, documented concerns in the vision benefit market. The proposed amended rule is a necessary and appropriate step in carrying out that directive.

The rule properly reflects the text and purpose of Act 142 and Arkansas Law, including that:

- Reimbursement for covered services shall not be less than the current calendar year Medicare reimbursement rate, regardless of Medicare coverage, consistent with Ark. Code Ann. § 23-99-1003(d);
- Reimbursement for covered materials shall not be nominal or de minimis;
- Applies the rule uniformly to vision benefit managers;
- Clarifies the Act's recoupment provisions; and
- Improves the rules original text related to provisions of the Vision Care Plan Act of 2015.

The rule will help to ensure the statute is implemented consistent with its plain language and the Legislature's clear intent. Arkansas optometrists continue to experience market practices that the Legislature expressly sought to address. The proposed amended rule provides reasonable, text-based guidance to ensure consistent application and enforcement of the law within the authority granted by the General Assembly.

For these reasons, the Arkansas Optometric Association respectfully urges adoption of Proposed Amended Rule 23 CAR pt 142 as published.

Thank you for your consideration and for the Department's careful work in implementing Act 142. We look forward to participating in the public hearing process.

Sincerely,

Julie Dolven, O.D.
President