

Clara Mezza

From: Michael Lindsey <Michael.Lindsey@walmart.com>
Sent: Friday, April 17, 2026 7:56 AM
To: Insurance.Legal
Subject: Public Comments - Act 142 Rules
Attachments: Letter AR Insurance Commission - Act 142 Rules.pdf

CAUTION: External Email

Commissioner Harris,

On behalf of Walmart, I wanted to pass along our public comments on the proposed Rules implementing Act 142. We do have a few suggestions that we think would improve clarity. Please let me know if you have any questions or need additional information.

Thanks,
Michael Lindsey
Director of Public Affairs and Government Relations
Walmart
479-402-1669
[Arkansas](#) / [Missouri](#)





April 15, 2026

Jimmy Harris
Commissioner
Arkansas Insurance Department
1 Commerce Way, Suite 102
Little Rock, AR 72202

E-MAIL: insurance.legal@arkansas.gov

Dear Commissioner Harris:

On behalf of Walmart Inc. (Walmart), I write to express our support for the proposed rule implementing Act 142.

The proposed rule provides that reimbursement paid by an insurer, vision benefit manager, vision care plan, or vision care discount plan to a vision care provider for covered services shall not be less than the current calendar year Medicare reimbursement rate for services provided to the enrollee.

To provide greater clarity and ensure consistent application, we recommend that the final rule specify how the Medicare Physician Fee Schedule (MPFS) rate should be applied. Specifically, we recommend clarifying that the applicable MPFS rate is:

1. the locality-specific rate for the geographic area in which the services are furnished;
2. the non-facility rate; and
3. the rate in effect for the applicable fee schedule year, as established by the Centers for Medicare & Medicaid Services.

This clarification would help ensure that insurers and vision plans apply the appropriate MPFS rate based on the date and location of service.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Michael Lindsey", is written over the typed name.

Sincerely,

Michael Lindsey

Director, Public Affairs and State and Local Government Relations
Walmart