

ONE HUNDRED EIGHTEENTH CONGRESS
Congress of the United States
House of Representatives
COMMITTEE ON ENERGY AND COMMERCE
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January 30, 2024

The Honorable Gene Dodaro
Comptroller General of the United States
Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Comptroller General Dodaro,

We write to request a Government Accountability Office (GAO) study that details the state of consolidation and vertical integration in the vision and dental benefits industries. Further, we ask that such study evaluate the impacts of such consolidation and vertical integration on consumers and independent health care practices.

According to recent reporting, there are over 45 million Americans enrolled in fully-insured vision plans, with the largest insurer controlling over 70 percent of the market share.¹ The two largest vision plans in the U.S. reportedly cover more than two-thirds of those with vision care coverage and are vertically integrated with manufacturers of eyeglass frames and lenses. Additionally, they own and operate laboratories that produce finished prescription eyewear and retail locations that employ eye doctors. Similar consolidation and vertical integration concerns exist in the dental benefits market.

We are interested in understanding the effects of consolidation and vertical integration in health care and how incentives change when the entity responsible for paying for care financially aligns itself with the entity responsible for providing such care. As such, we request that GAO please examine the following topics in its report:

- An analysis of the concentration of local, regional, state, and national markets for limited scope vision and dental benefits and of how vision and dental benefit manager consolidation, market concentration, and acquisitions of small and other independent health care practices may impact consumers – including through the prices paid by consumers, and health care providers;

¹ <https://www.markfarrah.com/mfa-briefs/highly-concentrated-vision-insurance-market-increasing/>

- An analysis of vertical integration among vision benefit and dental benefit managers and whether limited scope vision and dental benefit plans encourage enrolled individuals to purchase materials and utilize services that are wholly or partially-owned by a vision or dental benefit manager or its parent entity, and the impact this practice may have on consumers, including through the prices paid by consumers, and small and other independent health care providers; and
- An analysis of the extent to which providers of vision and dental benefits are vertically integrated with payers, whether these arrangements create an opportunity to evade existing laws and regulations, and whether there is sufficient enforcement authority and capacity to address concerns.

We appreciate your attention to this important issue and look forward to working together to understand the state of the vision and dental benefit market better. As a result, we will be able to help ensure that patients face lower prices, more choice, and increased access to care.

If you have any questions, please contact the Majority Energy and Commerce Committee staff at (202) 225-3641.

Sincerely,



Cathy Morris Rodgers
Chair
Committee on Energy and Commerce



Brett Guthrie
Chair
Subcommittee on Health