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West Virginia - VSP Network Access Plan

Vision Service Plan (VSP) owns the vision provider network that is used to issue VSP’s vision policies and leased by health plans/carriers licensed to sell vision insurance in West Virginia. Health plans/carriers lease this network for use as part of their vision policies issued through their arrangement with VSP. Qualified vision providers choose to participate in a VSP network and agree to provide eye care services and supplies in a manner that complies with VSP, West Virginia and federal requirements.

The West Virginia Department of Insurance (DOI) requires health carriers, including VSP, to provide members with a Network Access Plan. Network Access Plans are public documents that describe health carrier policies and procedures for maintaining and ensuring that their networks are sufficient and consistent with state and federal requirements. The VSP West Virginia Network Access Plan describes how we build, maintain, and provide our networks to members.

INTRODUCTION

This West Virginia Network Access Plan is available to anyone upon request and can be located on our website <https://www.vsp.com/>.

TELEHEALTH

VSP Currently follows American Medical Association (AMA) guidelines for refractive exam requirements for all exam service levels and requires all covered refractive exam services to be delivered by a licensed Eye Care Professional (ECP) in a VSP-qualified location. Any advances in telehealth should involve an ECP, keeping in place the role they play in promoting eye health and diagnosing and/or treating ocular disease.

VSP supports delivery of appropriate medical eye care services via telehealth channels to supplement access to quality vision care. As proof of concept, VSP also supports an ECP's provider's discretion to leverage technology for the remote delivery of a refractive routine eye exam to create access and scheduling/staffing flexibility to better manage patient flow. To remain current telehealth policy changes, VSP annually reviews new and/or revised CMS-approved telehealth services for integration with VSP products, as appropriate.

VSP will provide coverage for health care services appropriately delivered through telehealth on the same basis and to the same extent that VSP is responsible for coverage for the same service through in-person diagnosis, consultation, or treatment.

VSP does not include telehealth providers when determining the adequacy of its network's provider access.

MONITORING AND SECURING NETWORK ADEQUACY

VSP monitors its network adequacy quarterly utilizing Geo Access reports to ensure the number of providers to members is adequate. VSP utilizes Geo Access reports to analyze whether network access standards are being met. VSP's access standard is one doctor in a 10mile radius in urban/suburban areas and one doctor in a 25 mile radius for rural areas. If Geo Access reports determine the above standards are not being met, then VSP implements appropriate interventions and recruiting efforts. VSP also utilizes member complaints and satisfaction surveys to ensure that participating providers are within a practical driving distance and that appointment wait times and availability are reasonable.

If covered person is having difficulty accessing an in-network provider in their area, covered person should contact VSP's Customer Care toll-free at (1-800-877-7195) for assistance. If an in-

network provider cannot be found in the covered person's service area, VSP will reimburse the covered person for services received from a non-participating provider at the in-network rate. Covered persons will not be balanced billed.

REFERRALS

VSP does not make nor require referrals nor does VSP provide prior authorization for referrals. A member is able to obtain covered benefits, at the in-network benefit level, from a non-participating provider should VSP's network prove to not be sufficient. A covered person should call VSP Customer Service at **(800) 877-7195** to verify that their Benefit Authorization (i.e. VSP Plan and coverage) is up to date

OUR VSP NETWORK

At VSP we choose our network doctors carefully based on the following factors:

- 1) Professional Licensing-A Network Doctor is required to have a current and valid license to practice.
- 2) Work History-VSP obtains a minimum of the most recent five years of work history for each Network Doctor. If a provider has fewer than five years of work history, the time frame for work history starts at licensure. Any gaps in employment that exceed 6 months must be clarified by the Network Doctor.
- 3) Education-VSP verifies the highest level of education and training obtained by the Network Doctor as appropriate.
- 4) Malpractice/Professional Liability-VSP obtains confirmation of the past 5 years of malpractice settlements from the Network Doctor's malpractice carrier. A Network Doctor is required to have current malpractice insurance coverage.
- 5) Ethics-For each Network Doctor, VSP verifies whether there has been any loss of license, felony convictions, a history of loss or limitation of privileges or disciplinary actions. For each Network Doctor VSP verifies whether there are any state sanctions, Medicare or Medicaid sanctions, restrictions on licensure or limitations on scope of practice.

VSP network doctors have the following certifications: Optometrists (Doctors of Optometry) are Therapeutic Pharmaceutical Agent (TPA) certified and Ophthalmologists are American Board of Ophthalmology (ABO) certified.

MEMBERS WITH SPECIAL NEEDS

VSP promotes cultural competency among its employees and VSP network providers to ensure interactions with members are made with an awareness of and sensitivity to differences in culture, ethnicity, gender, age, disability, religion, social class and/or sexual orientation, especially as they relate to vision health care.

VSP contracted providers cannot discriminate against the hearing impaired, developmentally challenged and/or physically challenged. They must also allow full and equal access to covered services, including members with disabilities as required under the federal Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.

VSP provides access to free language interpretation in up to 170 languages and/or written translation services for all members in several ways:

- Members may contact VSP by calling **(800) 877-7195** to indicate their language needs
- All additional toll-free number is available for Spanish speakers as well as an IVR self-service option in Spanish and a Spanish version on vsp.com
- Auxiliary aids and services, including qualified interpreters for individuals with disabilities and information in alternate formats, are available free of charge when those aids and services are necessary to ensure equal opportunity to participate for individuals with disabilities. **Call (800) 877.7195 (TTY: 800.428.4833).**

QUALITY ASSURANCE

VSP's Quality Management/Improvement Program ensures quality eye care to members accessing VSP's doctors. The program objectively and systematically monitors and evaluates the quality and appropriateness of care and services. Local doctor and member feedback is obtained through VSP appointed State Professional Representatives to provide local and/or state specific input. Each quarter, VSP measures patient satisfaction through email surveys to determine the extent to which VSP has met their vision care needs and satisfaction. VSP management reviews the results quarterly and has a process for taking corrective measures when necessary. Finally, VSP monitors members' complaints, grievances and appeals for potential quality of care cases and conducts clinical reviews to determine if a quality-of-care incident occurred, then takes appropriate corrective action up to and including termination.

VSP's Quality Assurance (QA) Doctor Review seeks to identify, evaluate and educate Network doctors on matters that affect the quality of care and services provided to VSP members. All VSP

doctors are eligible for review and doctor reviews can be any time during their participation in the VSP Network. Doctors scheduled for a review may be selected based on prior non-passing reviews, complaints and grievances, referral from VSP's corporate committee and/or a special review request. Doctor review trends are communicated to the QM Committee and then shared with the Board of Directors via the QM Committee minutes.

We strive to continuously pursue opportunities for improvement and problem resolution.

GRIEVANCES AND APPEALS

Members are informed annually of VSP's grievance and appeal procedure when provided their Evidence of Coverage. Members have the right to expect quality care from VSP Network Providers. More information on VSP's grievance and appeal procedure is available under "Patient's Rights" on VSP's website at vsp.com.

Complaints and grievances are disagreements regarding access to care, quality of care, treatment or service. Members may submit any complaints and/or grievances, including appeals, in writing to **VSP at 3333 Quality Drive, Rancho Cordova, CA 95670-7985** or verbally by calling VSP's Customer Care Division at 1 (800) 877-7195. VSP will resolve the complaint or grievance within thirty (30) calendar days after receipt, unless special circumstances require an extension of time. In that case, resolution shall be achieved as soon as possible, but not later than one hundred twenty (120) calendar days after VSP's receipt of the complaint or grievance. If VSP determines that resolution cannot be achieved within thirty (30) days, VSP will notify the Member of the expected resolution date. Upon final resolution VSP will notify Member of the outcome in writing.

CHOOSING AND CHANGING PROVIDERS

When a member wants to receive services from a new VSP Provider or their current VSP Provider, they should contact the VSP Preferred Provider and make an appointment. The member should identify themselves as a VSP insured and the VSP Preferred Provider will contact VSP to verify eligibility.

PROVIDER DIRECTORIES

Members may find the locations of VSP Preferred Providers by visiting VSP's web site at vsp.com or by calling **VSP Customer Care toll-free at (800) 877-7195**. Members are not limited to any geographic area when they wish to use VSP's Plan Benefits. They may select and utilize a VSP Preferred Provider anywhere throughout the United States by using drop down options and the advanced search criteria within the Provider Directory. Members may also contact VSP to request a printed version of the Provider Directory. Both the online and print directories are updated weekly on Sunday evenings and the date of the most recent Provider Directory update can be found on the last page last line of the Provider Directory.

The information found in VSP's Provider Directories are provided by the individual providers, subject to regular audits, and based on our records as of the date of the search and/or printing of the Provider Directory. Providers are pro-actively sent a bi-monthly reminder to ensure the information that is appearing in the VSP Provider Directory is accurate. Members may report a directory inaccuracy by contacting VSP at (800) 877-7195 or emailing directory@vsp.com.

On a quarterly basis, VSP's Provider Network Development staff conducts audits by conducting an independent outreach to practice owners with current Directory information via an email campaign which includes embedded response forms. In the event there is no immediate response, that initial outreach is programmed with two cadenced reminder emails. Providers must use the embedded forms to respond by confirming their current information is accurate or they must provide updated information which immediately updates our protected database. VSP will follow up action if there is no response or if there is a returned response. Change responses for certain types of information independently and automatically populate without verification from the providers. Change responses for other information are identified and reviewed and verification calls are made by VSP staff to the practice owners. VSP's audit information is retained in a protected database for a period of six years and our provider directory process is compliant with all state and federal laws.

PLAN SERVICES AND PREVENTATIVE CARE BENEFITS

Members are informed annually of vision care services offered by VSP, including preventative care services, when provided their Evidence of Coverage, Schedule of Benefits and any applicable benefit riders. Members can also log into vsp.com to check their benefits for eligibility and to confirm in-network locations based on plan type.



The vision care coverage provided by VSP, is designed to provide members with access to qualified eye care professionals. The VSP Network Providers have the following certifications:

Optometrists (Doctors of Optometry) are Therapeutic Pharmaceutical Agent (TPA) certified and Ophthalmologists are American Board of Ophthalmology (ABO) certified.

VSP's plan services provide for comprehensive vision examinations and materials (eye glasses and contact lenses).

EMERGENCY AND URGENT CARE

VSP does not provide coverage for emergency medical care.

When vision care is necessary for urgent conditions, members may obtain Plan Benefits by contacting a VSP Network Provider or an Open Access Provider, if Open Access benefits are available. Services for conditions of a medical nature are covered by VSP only under supplemental eyecare plans. If a member purchased one of these plans, such coverage will be evidenced in an Additional Benefit Rider (Schedule C). If member has not purchased one of these plans, members are not covered by VSP for such services and should contact a physician under Members' medical insurance plan for care. For situations of a non-medical nature, such as lost, broken or stolen glasses, Member should call VSP's Customer Care toll-free number 1 (800) 877-7195 for assistance.

CONTINUITY OF CARE

Continuity of care is not applicable to routine vision plans as only routine exams and materials are covered. Routine exams and materials may be provided by providers without prior vision history.

Upon termination of a provider agreement, VSP shall remain liable for covered services rendered to each insured who remains eligible under a policy with VSP or by operation of law, and who is under the care of a participating provider at the time of termination, until the covered services being rendered to the enrollee by the participating provider are completed, or VSP makes reasonable and medically appropriate provisions for assumption of such covered serves by another provider.

VSP's agreements with its providers contain a hold harmless provision which prevents network providers from billing you if VSP is insolvent or cannot continue operations.

LANGUAGE ASSISTANCE

English	ATTENTION: If you speak another language, language assistance services, free of charge, are available to you. Call 1-800-877-7195 (TTY: 1-800-428-4833).
Espanol (Spanish)	ATENCIÓN: Si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al 1-800-877-7195 (TTY: 1-800-428-4833).
繁體中 (Chinese)	注意：如果您使用繁體中文，您可以免費獲得語言援助服務。請致電1-800-877-7195 (TTY: 1-800-428-4833)。
Tiếng Việt (Vietnamese)	CHÚ Ý: Nếu bạn nói Tiếng Việt, có các dịch vụ hỗ trợ ngôn ngữ miễn phí dành cho bạn. Gọi số 1-800-877-7195 (TTY: 1-800-428-4833)
Tagalog (Tagalog-Filipino)	PAUNAWA: Kung nagsasalita ka ng Tagalog, maaari kang gumamit ng mga serbisyo ng tulong sa wika nang walang bayad. Tumawag sa 1-800-877-7195 (TTY:1-800-428-4833)
한국어 (Korean)	주의: 한국어를 사용하시는 경우, 언어 지원 서비스를 무료로 이용하실 수 있습니다. 1-800-877-7195 (TTY:1-800-428-4833) 번으로 전화해 주십시오.
Русский (Russian)	ВНИМАНИЕ: Если вы говорите на русском языке, то вам доступны бесплатные услуги перевода. Звоните 1-800-877-7195 (телетайп: 1-800-428-4833).
(Arabic)	ملحوظة: إذا كنت تتحدث اذكر اللغة، فإن خدمات المساعدة اللغوية تتوافر لك بالمجان. اتصل برقم 1-800-877-7195 (رقم هاتف الصم والبكم: 1-800-428-4833).
Kreyòl Ayisyen (French Creole)	ATANSYON: Si w pale Kreyòl Ayisyen, gen sèvis èd pou lang ki disponib gratis pou ou. Rele 1-800-877-7195 (TTY: 1-800-428-4833).
Français (French)	ATTENTION: Si vous parlez français, des services d'aide linguistique vous sont proposés gratuitement. Appelez le 1-800-877-7195 (ATS : 1-800-428-4833).
Deutsch (German)	ACHTUNG: Wenn Sie Deutsch sprechen, stehen Ihnen kostenlos sprachliche Hilfsdienstleistungen zur Verfügung. Rufnummer: 1-800-877-7195 (TTY: 1-800-428-4833).
Polski (Polish)	UWAGA: Jeżeli mówisz po polsku, możesz skorzystać z bezpłatnej pomocy językowej. Zadzwoń pod numer 1-800-877-7195 (TTY: 1-800-428-4833).
Português (Portuguese)	ATENÇÃO: Se fala português, encontram-se disponíveis serviços linguísticos, grátis. Ligue para 1-800-877-7195 (TTY: 1-800-428-4833).
Italiano (Italian)	ATTENZIONE: In caso la lingua parlata sia l'italiano, sono disponibili servizi di assistenza linguistica gratuiti. Chiamare il numero 1-800-877-7195 (TTY: 1-800-428-4833).
日本語 (Japanese)	注意事項：日本語を話される場合、無料の言語支援をご利用いただけます。1-800-877-7195 (TTY: 1-800-4284833) まで、お電話にてご連絡ください。
(Farsi)	یارینایگار تر و صبیان نیز تلاه یست، د نیکمیوتگگفیسرافنا بیزهبرگا: هجو ابداشیمیمها امش دیرگیستما (1-800-877-7195 (TTY: 1-800-428-4833)

EXHIBIT A

County Name	Provider Type	Nearest Provider
<i>Barbour</i>		<i>Population 15,468 Nearest provider 12.7 miles</i>
Berkeley	Optometrist	
Boone	Optometrist	
Braxton	Optometrist	
Brooke	Optometrist	
Cabell	Optometrist	
<i>Calhoun</i>		<i>Population 6,179 Nearest provider 8.1 miles</i>
<i>Clay</i>		<i>Population 7,892 Nearest provider 21.6 miles</i>
<i>Doddridge</i>		<i>Population 7,735 Nearest provider 8.8 miles</i>
Fayette	Optometrist, Ophthalmologist	
<i>Gilmer</i>		<i>Population 7,377 Nearest provider 6.6 miles</i>
Grant	Optometrist	
Greenbrier	Optometrist	
<i>Hampshire</i>		<i>Population 23,302 Nearest provider 20.6 miles</i>
Hancock	Optometrist	
Hardy	Optometrist	
Harrison	Optometrist	
Jackson	Optometrist, Ophthalmologist	
Jefferson	Optometrist	
Kanawha	Optometrist, Ophthalmologist	
<i>Lewis</i>		<i>Population 16,892 Nearest provider 14.9 miles</i>
<i>Lincoln</i>		<i>Population 20,162 Nearest provider 15.0 miles</i>
Logan	Optometrist	
Marion	Optometrist	
Marshall	Optometrist	
Mason	Optometrist	
<i>McDowell</i>		<i>Population 18,363 Nearest provider 16.5 miles</i>
Mercer	Optometrist, Ophthalmologist	
<i>Mineral</i>		<i>Population 26,857 Nearest provider 6.1 miles</i>
Mingo	Optometrist	
Monongalia	Optometrist	
<i>Monroe</i>		<i>Population 12,332 Nearest provider 12.6 miles</i>

<i>Morgan</i>		<i>Population 17,221 Nearest provider 12.0 miles</i>
<i>Nicholas</i>		<i>Population 24,300 Nearest provider 26.1 miles</i>
Ohio	Optometrist	
<i>Pendleton</i>		<i>Population 7,601 Nearest provider 26.1 miles</i>
Pleasants	Optometrist	
<i>Pocahontas</i>		<i>Population 7,841 Nearest provider 27.4 miles</i>
<i>Preston</i>		<i>Population 34,358 Nearest provider 14.8 miles</i>
Putnam	Optometrist	
Raleigh	Optometrist	
Randolph	Optometrist	
Ritchie	Optometrist	
Roane	Optometrist	
<i>Summers</i>		<i>Population 11,908 Nearest provider 19.6 miles</i>
Taylor	Optometrist	
<i>Tucker</i>		<i>Population 6,672 Nearest provider 19.8 miles</i>
Tyler	Optometrist	
Upshur	Optometrist	
Wayne	Optometrist	
<i>Webster</i>		<i>Population 8,249 Nearest provider 27.6 miles</i>
Wetzel	Optometrist	
<i>Wirt</i>		<i>Population 5,063 Nearest provider 16.5 miles</i>
Wood	Optometrist	
Wyoming	Optometrist	

Please note: Although an optometrist (Doctor of optometry) and an ophthalmologist (Doctor of Medicine) have different types of degrees and licenses, the services that VSP covers are within the scope of licensed practice of both. Accordingly, it makes no difference with respect to services that VSP covers whether a doctor is an optometrist or an ophthalmologist.