



*National Association of
Optometrists and Opticians*

Professionalism Consumerism Education

Senator Rob Bradley
Chair, Senate Appropriations Committee
404 S. Monroe Street
Tallahassee, FL 32399-1100

RE: SB 1526 - Telehealth

Dear Senator Bradley, Vice Chair Simpson and Distinguished Members of the Senate Appropriations Committee:

On behalf of the National Association of Optometrists and Opticians (NAOO), a national organization representing the retail optical industry and its thousands of employed and affiliated optometrists and opticians, I'd like to go on record as requesting that the committee resist all efforts to limit the use of telehealth for ocular patients and prescriptions as unnecessary for consumer protection.

The NAOO is consumer-service oriented, dedicated to the proposition that the consumer's visual care needs are met most completely and economically by the free market, in the tradition of the American business system. NAOO members collectively represent nearly 9000 co-located eye care offices and optical dispensaries serving millions of patients and eyewear customers each year. Our members have over 600 offices in Florida.

Our request is based on recent efforts to reduce the authority of ocular prescribers – eye doctors - to determine what is in the best interest of their patients, which amounts to an attempt to stifle the development and use of new technology in the provision of eye care. Attempts to ban telehealth examinations or eye wear prescriptions or renewals puts unnecessary limits on the use of remote technology and will tie the hands of practitioners as such technology further develops in the future. A better alternative to rigid restrictions regarding limitations on ocular telehealth is to allow qualified licensees to determine whether to use telehealth, and to what degree, when ocular care is sought by a patient, as appears to be the general intent of SB 1526. We respectfully request that ocular telehealth not be treated any differently.

As the Federal Trade Commission has commented regarding other, similar legislation, telehealth can potentially increase the supply of accessible practitioners and thereby enhance price and non-price competition, reduce transportation expenditures and improve access to quality care. Generally, competition in health care markets benefits consumers by containing health care prices, expanding access and choice, and promoting innovation, but efforts to put restrictions on ocular telehealth practices would have the opposite effect. We urge you to resist any such efforts.

In summary, we encourage you and the Senate to rely on the judgment of the vision care professional in deciding whether to use telehealth and the appropriate type of examination and level of care to be provided. Thank you for the opportunity to comment. I may be reached at the address below or at joebneville@gmail.com.

Very truly yours,

Joseph B. Neville

Joseph B. Neville
Executive Director
National Association of Optometrists and Opticians, Inc.

P.O. Box 498472, Cincinnati, OH 45249
(513) 607-5153