

THE OPTOMETRIC SOCIETY

To: Utah Board of Medicine
160 East 300 South, 1st Floor Lobby
Salt Lake City, UT 84111
P.O. Box 14674

From: The Optometric Society
PO Box 8288
La Jolla, CA 92038
Date: November 26, 2014
RE: Opternative

Opternative is an "online refractive eye exam" after which a glasses or contact lens prescription is given, signed by an ophthalmologist. Expected to launch this winter, this technology does not include a "eye health exam." This would be recommended, though not required, with the prescription already in hand.

We would like to bring to your attention the following concerns:

1. While ophthalmologists can delegate the refraction to another trained professional, it is the well established and accepted standard of care, that a refraction is not to be independent from an ocular health exam. This is vital for the detection of eye diseases that result in permanent vision loss as well as serious systemic diseases. Telehealth providers should be evaluated according to the standard of care applicable to those in traditional, in-person settings, according to specialty.
2. Under The Fairness to Contact Lens Consumers Act, the expiration date of a contact lens prescription must be specified based on the medical judgment of the prescriber, with respect to the ocular health of the patient. Contact lens complications such as corneal neovascularization, warpage, and infiltrates indicate compromise of ocular health, for which no symptoms may be reported. Neither a prior contact lens prescription nor a close-up photo of the patient's eyes can confirm ocular health for established contact lens wearers.
3. No one under 18, over 40, or with specific medical conditions such as diabetes, hypertension, known eye diseases, will qualify to receive a prescription. However, the use of online questionnaires is inadequate to establish the patient's age and medical/ocular history. Records of past care are necessary to verify pre-existing medical conditions. Age should be verified by acceptable means of identification. We would expect that medical history be verified with a dated copy of a completed physical examination and ocular history be verified with a dated copy of a completed eye examination. A doctor-patient relationship requires an appropriate examination, either physically or by the use of diagnostic equipment through which images and medical records may be transmitted electronically. The patient record established by online eye exams should be consistent with existing laws and regulations governing patient health care records.

4. The risk with all telehealth is substandard or “cut-rate” professional services. With the promise to save people the commute, the wait, the time, and the money, standards of care can be significantly compromised. It is expected that all physicians who provide telehealth place the welfare and health of the patients first. A prescription should not be given after an online eye examination, unless a dated copy of a recent ocular health examination (within 6 months) is part of the patient's record.

Telehealth is the way of the future and we agree that it is a powerful tool in medical practice, but not a separate form of medicine. We would expect that physicians who provide medical care, whether in-person or via telehealth, comply with acceptable, appropriate, and professional standards of care. While we support technology, increased access to care, and patient choice, we do not support the use of online eye exams to give prescriptions without an accompanying ocular health exam. This does not adhere to current standards of care and therefore represents a compromise to the health and safety of the public and our patients. We appreciate your consideration of this important matter and look forward to communicating with you.

Sincerely,

The Optometric Society Board of Directors

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