



*National Association of  
Optometrists and Opticians*

Professionalism Consumerism Education . . . . .

Senator Aaron Bean  
Chair, Senate Subcommittee on Health and Human Services  
404 S. Monroe Street  
Tallahassee, FL 32399-1100

**RE: SB 1526 - Telehealth**

Dear Senator Bean and Distinguished Members of the Appropriations Subcommittee:

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 opposing a proposed ocular telehealth amendment to **SB 1526** relating to the use of remote technology in prescribing prescription eye wear and ask you to oppose the amendment 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.

The amendment reads as follows:

*"(f) A prescription for lenses, spectacles, eyeglasses, contact lenses, or other optical devices may not be made based on telehealth services or solely on the refractive error of the human eye as determined by a computer controlled device such as an autorefractor."*

This amendment attempts to stifle the development and use of new technology in the provision of eye care. It 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 such as these is to allow qualified licensees to determine whether to use telehealth and to what degree when ocular care is sought by a patient.

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 this amendment would have the opposite effect. We urge its defeat.

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](mailto:joebneville@gmail.com).

Very truly yours,

*Joseph B. Neville*

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