



HEALTH CARE ALLIANCE FOR  
PATIENT SAFETY

March 1, 2021

Representative Bronna Kahle  
Chair  
House Health Policy Committee  
N-991 House Office Building  
Lansing, MI 48933

Dear Chair Kahle,

I write to you today as Chairman of the Health Care Alliance for Patient Safety (APS), a patient-centric group representing health care providers and manufacturers within in the eye care industry. APS is dedicated to ensuring patient health and safety and the protecting the doctor-patient relationship, which is the essential foundation of personalized health care decision making.

We write to you today with significant concern with House Bill 4356, a bill that could have a detrimental impact on patient eye health and safety **for the approximately 1.5 million patients wearing contact lenses in the state of Michigan.**

HB 4356 compromises patient-focused healthcare, the critical doctor-patient relationship, and stands to negatively impact the overall health of patients across Michigan who choose contact lenses for vision correction or other purposes.

HB 4356 places the commercial interests of certain retailers ahead of patient health and safety by removing the critical doctor-patient relationship from the center of care. This undermines the foundation of current patient protection standards and will lead to more cases of improper dispensing and use of contact lenses, which already cause nearly 1 million additional health care visits and \$175 million in added healthcare costs each year.<sup>1</sup>

We recognize that utilizing recommended and appropriate modes of web-based care via telehealth has provided expanded access for patients to have their medical needs met by a healthcare professional when they are unable to be seen in-person. The appropriate use of this type of care has been critical throughout the pandemic. Looking forward, APS recognizes that telehealth in medicine will continue to play an important role in the delivery and access of essential health care. But HB 4356 goes beyond an appropriate mode of web-based care and, if passed, will jeopardize patient eye health.

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<sup>1</sup> <https://www.cdc.gov/media/releases/2014/p1113-eye-infections.html>

In light of our concerns, The Health Care Alliance for Patient Safety would object to HB 4356 unless certain patient-safety provisions are included in the bill. As other states have done in similar legislation, online fulfillment services for contact lens or eyeglass prescriptions have been limited to adults between the ages of 18 and 55. This restriction makes sense given that virtual fulfillment services often fail to detect the critical eye health conditions, such as retinopathy, glaucoma, and cortical visual impairment, that too often plague our children and seniors.

Furthermore, under HB 4356, a patient could go for years, if not decades, without an in-person eye exam and simply rely on telemedicine to fill a contact lens or eyeglass prescription. Reevaluating a contact lens prescription at least annually is the standard of care in most states because patients' prescriptions and eye health can change over time. Without any patient centric protections for online fulfillment services– and any requirement that patients see their doctor in person – the bill puts Michiganders' eye health in jeopardy at the same time it compromises the critical doctor-patient relationship.

As Chairman of APS, representing the collective interests of businesses within the eye health industry, we respectfully request that you **OPPOSE HB 4356 UNLESS ADDITIONAL PATIENT-SAFETY PROVISIONS are included** when the bill comes before you. In short, we urge you to uphold current standards for patient safety and maintain the crucial doctor-patient relationship in Michigan.

Thank you very much for your leadership during these incredibly trying times; I can only imagine the difficulty you have faced in your position on issues such as these and many others. If you have any questions or comments, please contact Alison Teitelbaum, Executive Director of APS, at [Alison@patientsafetytoday.com](mailto:Alison@patientsafetytoday.com).

Sincerely,

A handwritten signature in black ink that reads "David A. Cockrell, O.D." The signature is written in a cursive style and is positioned above a light beige rectangular background.

David Cockrell, O.D.  
Chair, Health Care Alliance for Patient Safety