

From: Dr. Carl Whitehouse
Sent: Monday, April 05, 2004 3:12 PM
To: CONTACTLENSRULE
Subject: Contact Lens Rule Project #411002

I am concerned that in an attempt to promote consumerism and competition, the new law and regulation regarding contact lens prescriptions is rife for abuse.

I just received a contact lens prescription verification form recently from Coastal Contact Lenses which illustrates my point.

1. The initial statement following the prescription to be verified is "If this order matches the patient's prescription, no action is required." What seems like an attempt to make the process easy for the provider is in reality a de facto passive verification order. NO such sloppy record-keeping is allowed for on-line pharmacies. Why should a supplier of a product placed in a person's eye have less scrutiny.

Furthermore, to meet present standards of care I need to know (1) IF my patient's prescription is being filled, (2) if it is being filled CORRECTLY, and WHEN it is being filled. Unless this information is reported to me, I cannot tell if the patient is trying to double or triple up on the RX by buying lenses from several sources. I REALLY THINK WE NEED TO BE NOTIFIED WHEN A PRESCRIPTION IS FILLED, EVEN IF WE DIDN'T VERIFY IT PREVIOUSLY. Unless I have that information, and the patient does not report for regularly scheduled care, I have no way of knowing what their status is. (out of lenses, doubling up on the RX, or whatever) Patients often do many counterproductive things in an attempt to save money, and I do not feel it is in the patient's best interest to have a system that administratively allows them to put themselves at risk.

2. The final statement on the Coastal Contacts form is "The expiration period begins only after the eye care provider gives the prescription to the consumer." This is a blatant attempt to extend the expiration period. Patients lose prescriptions, or use a two year-old lens box to send prescription information to on-line suppliers 2 days before their prescription expires, AND THEY KNOW IT. THE EXPIRATION PERIOD BEGINS ON THE DATE I DETERMINE THAT A SET OF LENS SPECIFICATIONS IS THE FINAL PRESCRIPTION. I don't want to have to argue with some warehouse joint in order to keep a patient from over-wearing a prescription. Please clarify this issue. The contact lens prescription is the only tool I have to require patient compliance with accepted standards of care.

Thank you.

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