



April 20, 2021

Chair Curt VanderWall  
Vice Chair John Bizon  
Minority Vice Chair Winnie Brinks  
Michigan Senate Health Policy and Human Services Committee  
Senate Hearing Room  
Ground Floor, Boji Tower  
124 W. Allegan Street  
Lansing, MI 48933

Dear Chair VanderWall, Vice Chair Bizon, Minority Vice Chair Brinks, and members of the Michigan Senate Health Policy and Human Services Committee:

My name is Courtney Joslin and I am a resident fellow for competition policy at the R Street Institute. R Street is a nonprofit, nonpartisan public policy research organization whose mission is to engage in policy research that supports free markets and limited, effective government. My research focuses on health disintermediation and scope of practice reform in health care. I am writing today in regard to House Bill 4356, which would allow Michigan residents to renew their contact lens prescriptions online.

The vast majority of states allow online contact lens prescription renewals for a variety of reasons.<sup>1</sup> First, this method of telehealth is safe. The American Academy of Ophthalmology and the Mayo Clinic maintain that healthy adults do not need a comprehensive eye exam every year, meaning that renewing a contact lens prescription online is perfectly viable for many contact lens wearers.<sup>2</sup> House Bill 4356 still requires that patients receive an initial contact lens prescription in person, which should alleviate concerns about the quality of the initial contact lens prescription.

Further, online prescription renewals are both convenient and affordable. Online renewals allow people to order contacts from home, rather than going to a physical medical office. Particularly during the COVID-19 pandemic, this kind of accessibility is crucial. The convenience also contributes to the affordability of online renewals: telehealth in general reduces the overall cost of care because it meets people where they are, which is particularly important for those in rural areas with restricted access to medical offices.<sup>3</sup> Online renewals mean that consumers can comparison shop based on price of contact lenses. This kind of competition ultimately benefits consumers by providing the cheapest option.

Finally, this bill would better protect Michiganders' rights under the Federal Trade Commission's Contact Lens Rule. The Contact Lens Rule, designed to prevent contact lens prescribers from holding onto patients' prescription information, requires that prescribers give patients a copy of their prescription information without prompting.<sup>4</sup> This allows patients to comparison shop for lenses. Without easy access to prescription information, patients must return to their prescriber each time they need to refill

a prescription. The Contact Lens Rule strives to reduce these unnecessary burdens. Allowing online prescription renewals will further bolster citizens' access to convenient and affordable lenses.

Thank you for your time,

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<sup>1</sup> "The Issue," Americans for Vision Care Innovation, 2021.

<https://americansforvisioncareinnovation.org/the-issue/>.

<sup>2</sup> "Eye Exam," Mayo Clinic, last accessed April 19, 2021. <https://www.mayoclinic.org/tests-procedures/eye-exam/about/pac-20384655>;

David Turbert, "Eye Exam and Vision Testing Basics," American Academy of Ophthalmology, Jan. 14, 2021. <https://www.aao.org/eye-health/tips-prevention/eye-exams-101>.

<sup>3</sup> "Telehealth: Helping Hospitals Deliver Cost-Effective Care," American Hospital Association, last accessed April 19, 2021. <https://www.aha.org/system/files/content/16/16telehealthissuebrief.pdf>.

<sup>4</sup> "The Contact Lens Rule: A Guide for Prescribers and Sellers," Federal Trade Commission, June 2020. <https://www.ftc.gov/tips-advice/business-center/guidance/contact-lens-rule-guide-prescribers-sellers>.