

Comment #: 13

February 29 2004

Dr. Duane Deeds
Deeds Family Vision Care, Inc.
Ohio
United States

To Whom it may Concern:

The release of a contact lens prescription after a completed exam and fitting evaluation is a good requirement. However, I feel it would best be accomplished by dropping passive verification and easing the requirement to release to only upon request.

In our office, patients are shopping their invalid prescriptions to multiple contact lens vendors, forcing my staff to waste valuable time rejecting the same expired prescription over and over again. Also, some vendors do not have toll free phone numbers that we can call if we have a question. We are charged long distance tolls to help them complete their sale if we wish to communicate with them by phone or fax. Other vendors refuse to accept phone calls at all from our office if we have a question about a verification request. Still other vendors have phone numbers that are constantly busy. Most of the other vendors are contacting our office by automated computer. In some cases, if there is a mistake, we are unable to reply or respond. This is not direct communication as required by the new rule.

I feel this required policing causes undo financial burdens to the prescribing doctor's practice. I believe that the pharmaceutical industry's methods of prescription filling should be the example of how to handle these potentially blinding products.

The doctor, upon request by requirement, writes a prescription for the patient's contact lenses on paper only once, with all the required parameters, an expiration date, and the maximum number of lenses to be dispensed (for the life of the prescription's validity). The patient then can shop around and choose to hand over or mail this one prescription to the vendor of their choice - exactly like a drug prescription is handled so no one is able to hoard contact lenses past their expiration period like drugs are handled to avoid damage to the patient.

Thank you for your consideration in this matter.

Sincerely,

Duane Deeds, O.D.

Comment #: 42

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