

September 16, 2020

The Honorable Joseph Simons  
Chairman  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Chairman Simons,

The undersigned companies are concerned with the finalization of changes to the Contact Lens Rule. The updated regulations provide an option whereby physicians can use electronic health records (EHR) and patient portals to support the provision of contact lens prescriptions. The Commission also requires that physicians retain evidence that the prescription was sent, received, or made accessible, downloadable, and printable. Further, the Commission requires that physicians obtain “verifiable affirmative consent” to provide the prescription electronically.

In EHR systems, current supports exist to assist physicians with compliance, however additional time is needed to update systems to best support doctors and reduce burden. EHR companies are already working comply with Office of the National Coordinator Health IT requirements related to the 21<sup>st</sup> Century Cures Act. Additional government mandated regulatory updates add additional pressure to our companies.

We respectfully request that the Commission review the necessity of any Rule changes and, at a minimum, delay implementation to provide additional time to allow for EHR companies to make system updates to best serve physicians and their patients.

Sincerely,

Karen Perry, OD FAAO  
Director, Professional Relations, Government Regulation and EHR Compliance  
Compulink Healthcare Solutions, Inc.