

H. Telehealth Regulation Update from the
Wisconsin Optometric Association (WOA)

State of Wisconsin
Department of Safety & Professional Services

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Valerie Payne, Executive Director on behalf of Bob Schulz, Chair		2) Date when request submitted: 9/20/2021 Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting
3) Name of Board, Committee, Council, Sections: Optometry Examining Board		
4) Meeting Date: 9/23/2021	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Before the Optometry Examining Board Report on Opioid Abuse agenda item: Telehealth Regulation Update from the Wisconsin Optometric Association (WOA) – Discussion and Consideration
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session	8) Is an appearance before the Board being scheduled? (If yes, please complete Appearance Request for Non-DSPS Staff) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:
10) Describe the issue and action that should be addressed: The Board shall review the update from the Wisconsin Optometric Association for discussion and consideration on telehealth regulation.		
11)	Authorization	
<i>Valerie Payne</i>		9/20/2021
Signature of person making this request		Date
Supervisor (if required)		Date
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date		
Directions for including supporting documents: 1. This form should be attached to any documents submitted to the agenda. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.		



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DATE: September 20, 2021

TO: Robert Schulz O.D., Chair Wisconsin Optometry Examining Board
RE: Wisconsin Optometric Association Comments on Telehealth

Good morning, Chairman Schulz and members of the Wisconsin Optometry Examining Board (OEB). My name is Peter Theo. I am the Executive Vice President for the Wisconsin Optometric Association (WOA) and appreciate the opportunity to provide a few thoughts relating to telehealth services provided to Wisconsin citizens as well as current legislation making their way through the Wisconsin Legislature (Senate Bill 309 and Assembly Bill 296).

On several occasions over the last few years, WOA has raised the issue of telehealth care before the OEB, largely through brief comments during the public comment section on the agendas. Our intention was (is) to have the board review and discuss eye care services provided through telehealth to Wisconsin citizens and how best to protect patients and consumers when receiving distant and remote care.

WOA believes providers of vision and eye health care delivered via telehealth must be required to hold a valid Wisconsin optometry license to safely provide care to patients in Wisconsin. This would ensure these providers adhere to the same legal and regulatory requirements as instate, in-person providers. Additionally, we believe regulatory boards, such as the Optometry Examining Board (OEB), must retain the ability to regulate optometric services whether they are provided in-person or through telehealth, including the ability to adopt additional protections. We believe these elements are critical to protecting the health and safety of Wisconsin's citizens.

As mentioned above, there are currently two legislative proposals (identical bills) addressing telehealth in Wisconsin. These proposals offer a single definition of telehealth for all providers, including optometry. Since the Medical Examining Board adopted their own rules several years ago, it is unclear how or if any of these proposals would impact them.

WOA has long recognized telehealth as an evolving tool for the delivery of health services, and we support the appropriate and safe use of telehealth services to supplement access to high-value, high-quality eye health and vision care. Telehealth can serve to improve patient coordination and communication among and between Doctor of Optometry, other eye doctors, and additional primary care or specialty care providers. However, we do have concerns that not all telehealth services and/or providers will maintain the same standard of care patients receive from services provided in-person. WOA believes these concerns can be addressed by having the OEB retain regulatory authority over vision and eye health in telehealth as it currently does with in-person care, as stated in above.

Thank you again for the opportunity to provide comments on the growing interest in telehealth services and the potential need to apply additional guiderails to its use in Wisconsin.

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