



P.O. Box 350, Stevenson, MD 21153 ♦ T: (410) 486-9662 ♦ F: (443) 378-8845 ♦ [www.marylandoptometry.org](http://www.marylandoptometry.org)

March 7, 2024

The Honorable Delegate Joseline A. Pena-Melnyk, Chairman  
Health & Government Operations Committee  
House Office Building, Room 241  
Annapolis, Maryland 21401

**Re: Testimony in Opposition of House Bill 1292 “Optometrists - Prescriptions for Glasses and Contact Lenses - Pupillary Distance Measurement”**

Dear Chairman & Members of the Committee:

The Maryland Optometric Association (MOA) submits this testimony in strong opposition to House Bill 1292 entitled, “Optometrists - Prescriptions for Glasses and Contact Lenses - Pupillary Distance Measurement” (HB 1292). Passage of HB 1292 would require optometrists ONLY as eye care providers (not ophthalmologists) to provide a Pupillary Distance (PD) measurement for any and all prescriptions written for contact lenses or eyeglasses during an eye examination at no charge to the patient. This policy would have deeply negative implications for patient outcomes as well as eye care provider practices.

MOA is a 501 (c) 6 non-profit trade association representing hundreds of member optometrists in almost every jurisdiction in the State. Like ophthalmologists, optometrists practice in different modalities. Many optometrists practice in settings that only provide medical eye care to patients. For these doctors, and their ophthalmologist counterparts, recordation of a patient’s PD measurement has no place in the patient care routine. Even doctors working in optometry and ophthalmology practices that provide vision care, do not (have not ever) measured a patient’s PD as part of a comprehensive eye exam. Here’s why...

- Only eye care practices that have an optical dispensary have the pupilometer equipment to provide an accurate PD measurement.
- Contact lenses are defined by the FDA & eyeglasses are FTC defined prescription devices - both requiring a doctor's signature. This involves medical decision making. Ophthalmologists & optometrists are held to the SAME high standard with respect to this decision making process. Any state prescription requirements mandated by this legislation would therefore become the standard of care that must apply to all eye care providers - optometrists and ophthalmologists.
- There is no PD measurement associated with the prescription of contact lenses.
- PD is a measurement taken when fabricating eyeglasses. Prescribing doctors (optometrists and ophthalmologists) do not take this measurement when writing an eyeglass prescription, and it is not part of the required measurements for eye health.
- The optician (not optometrist or ophthalmologist) takes this measurement at the time of frame selection/ordering. Opticians are trained to determine proper lens design, shape, and position for accurate viewing through the prescribed spectacle measurements.
- PD only measures the horizontal distance between the two eyes. Vertical measurements and lens design must also be factored in when fabricating eyeglasses, so providing only the PD provides incomplete data for online ordering. This often leads to improperly designed prescription glasses that can be detrimental to patients’ vision.

- A [study](#)<sup>1</sup> on online spectacle fabrication accuracy found that over 40% of glasses made online failed to meet optical requirements for the patient's vision or safety needs.
- As written, this bill would require carriers/Medicare, to add a measurement component to the comprehensive eye exam resulting in significant administrative burden.

HB 1292 will create significant administrative burdens for optometry and ophthalmology practices, will result in diminished patient care outcomes and may cause doctors to stop providing vision care services for patients in need. For these reasons and the many stated herein, the Maryland Optometric Association urges this Committee to vote unfavorably on House Bill 1292.

Sincerely,

A handwritten signature in black ink, appearing to read "Vicky Wong". The signature is fluid and cursive, with the first name "Vicky" and the last name "Wong" clearly distinguishable.

Vicky Wong, O.D.  
MOA President

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<sup>1</sup> <https://pubmed.ncbi.nlm.nih.gov/21871395/>