

Agency Response to Economic Impact Analysis

The Board of Optometry does not fully concur with the Analysis of the Department of Planning and Budget on proposed regulations for 18VAC105-20-10 et seq., Regulations Governing the Practice of Optometry, relating to prescribing of opioids.

The analysis states that the proposed provisions “increase time costs for both TPA-certified optometrists and patients and recordkeeping costs for the optometry practice.” Optometrists on the Board uniformly agreed that, seven days following an optometric treatment, a patient should not be experiencing pain significant enough to continue prescribing opioids. If that is the case, the current standard of care would necessitate that the patient be re-checked to assess the problem and referral for medical care may be warranted. Therefore, the proposed regulations for opioid prescribing are consistent with current practices and do not represent an increase in costs to the practice or the patient.