

Join the

**Kids Eyes Count**

C A M P A I G N



September 25, 2008

Ms. Susan Meister  
 Administrative Rules Coordinator  
 Illinois Department of Public Health  
 535 W. Jefferson Street, 5<sup>th</sup> Floor  
 Springfield, Illinois 62761  
 dph.rules@illinois.gov

RE: Objection to proposed rule for Public Act 95-0671

Dear Ms. Meister:

I object to the following sections of the proposed amendments to the Child Health Examination Code: 665.105, 665.150-160, and 665.610-650, including Appendix A and C. I have explained my reasons and included recommendations to improve this permanent rule.

1. **665.105 Definition for “Vision screening:”** “**Vision screening services include testing, evaluation and follow-up, which may include a recommendation for an eye examination.**” I object to the implication that vision screeners can test and evaluate. Only licensed doctors can test and evaluate. *Recommended definition: Vision screening services include screening tests and follow-up, which may include a recommendation for an eye examination.*
2. **665.150 Report Forms.** “**For eye examinations, the required form is the Illinois Department of Public Health Eye Examination Report.**” I object to the “Illinois Department of Public Health Eye Examination Report” as the only form parents could submit.
3. **665.160 (c) Proof of Examination** “**For the purpose of this Part, ‘proof of eye examination’ refers to completion of the Illinois Department of Public Health Eye Examination Report in accordance with Section 665.150.** Again, I object to naming the State form as the only form parents could submit as proof of an eye exam. Vision First has an excellent form that contains the specifics required in the law and more. *Please read the attached, “Benefits of the Vision First Form.”*
4. **665.610 (e)** “**In addition to the requirement of subsection (d), optometrists shall include measurements of binocular acuity and ocular motility, and color vision screening in the required eye examination, as required by the Illinois Optometric Practice Act of 1987.**” I object to naming this additional requirement in the rule for only optometrists.
5. **665.620 (a and b) Vision examination repealed.** I object to the repeal of Public Act 85-0351, 105 ILCS 5/27-8.1. Public Act 95-0671 replaces only the kindergarten level (or first grade) or age 5. The other grades should remain and be amended as follows: *It is also recommended, but not required, that an eye examination be performed on public, private/independent, and parochial school students by a physician who performs eye examinations or an optometrist. (a) If an eye examination is performed, it shall be performed in*

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*place of a vision screening and conducted within one year: 1.) Prior to the date of entering the sixth grade; and 2.) Prior to the date of entering the ninth grade; (b) For students attending school programs where grade levels are not assigned, examinations shall be completed prior to the date of entering and within one year prior to the ages of 11 and 15.*

6. **665.630 Eye Examination Report** I object that the eye examination shall be recorded *only on the Department of Public Health Eye Examination Report*. The Vision First form was created over five years ago and has been successfully used. *On behalf of Vision First, I urge the following, "The eye examination shall be recorded on the Department of Public Health Eye Examination Report, or any other form approved by the State of Illinois, as prescribed by the Department for statewide use."*
7. **665.640 Indigent Students—Repealed** I object to eliminating any source of help for indigent students. Recommendation: *Replace "vision examinations" with "eye examinations" to remain consistent with the text in the rule.*
8. **665.650 (a and b) Waiver of Eye Examination Requirement** I object to the waiver form due to a child's school by October 15 of the school year. The waiver should be given after October 15. Recommendation: *Add the following, "If the child fails to present proof of a completed eye examination, or the child fails to present proof that an eye examination will take place within 60 days after October 15, then a waiver form shall be given. If the waiver form is not submitted within 60 days after October 15, then the school may withhold the child's report card until the eye examination waiver form is submitted."*
9. **665.Appendix A** I object to the word "complete" in the first sentence. The law states "physician who provides eye examinations," not complete eye examinations. I also object to the following terms used in the State form with the column, *Not able to assess*: binocular function; accommodation and vergence; color vision; and oculomotor assessment. I also object to the question, "Was refraction performed with cycloplegic agents?"
10. **665.Appendix B? Or is this part of A? (not numbered)** I object to the removal of the former *State of Illinois Vision Examination Report*. What is the State going to send to parents following a failed vision screening? This report should be retained and renamed, "*State of Illinois Vision Screening Report*." Keep the top half of the report and remove the bottom half of the report including the subtitle, "to be completed by examining doctor." A report should be sent to parents following a failed vision screening.
11. **665.Appendix C** I object to this wording in the proposed waiver. The title should also remain consistent with the full text. *Replace vision examination, "I am unable to obtain the required vision examination because..." with eye examination in the heading*. Also, regarding #1: How could a child enrolled in the free and reduced lunch program be ineligible for public assistance? I thought Illinois' All Kids Health Insurance covered all kids. Recommendation: *Remove #1; Modify #2—"My child is enrolled in Medicaid/All Kids, but I am unable to find an optometrist, or physician who performs eye examinations, in the community who accepts Medicaid/All Kids and is able to examine (not see) my child; Modify #3—Replace "see my child" with "examine my child" and add "charitable organizations." Example: "My child does not have any type of medical or vision/eye care insurance coverage, and there are no low-cost vision/eye clinics or charitable organizations in our community that provide or support eye examinations.*

Vision First will be promoting the *Kids Eyes Count Campaign* to Illinois schools statewide once the rulemaking is complete for P.A. 95-0671. It is our hope and goal that the State of Illinois will recognize our efforts and approve the Vision First report form during the rulemaking process.

C O P Y

All children entering kindergarten in Illinois deserve the best start possible for a lifetime of learning. Healthy eyes and good vision are a child's best school supply.

If you have any questions or if you need further information, please contact me.

Respectfully submitted,

Mrs. Janet V. Hughes, Founder and President  
Vision First Foundation

Attachments: Vision First forms (1) Proposed sample *Preschool Comprehensive Eye and Vision Examination Report for Illinois*; (2) Proposed sample *Student Comprehensive Eye and Vision Examination Report for Illinois*.

cc: Ms. Vicki Thomas, Executive Director  
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**B E N E F I T S**  
**of the**  
**VISION FIRST FORM**

Designed for the parent and teacher.

Provides education on children's vision.

Suitable for recommended and required eye exams.

Emphasizes a comprehensive eye and vision examination.

Illustrates eye health, visual acuity, refractive evaluation, and visual efficiency.

Accompanies prewritten letters for schools.

Contains a vision screening disclaimer.

Includes a *Reference Page* for parents and teachers.

Represents high standards of eye care.

Brings meaning and purpose to an eye examination.

Support the approval of the Vision First  
*Preschool and Student Comprehensive Eye and Vision Examination Report*  
as proof of an eye examination.