

October 12, 2008

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Ms. Susan Meister  
Administrative Rules Coordinator  
Illinois Department of Public Health  
535 W. Jefferson Street, 5th Floor  
Springfield, IL 62761

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

Dear Ms. Meister:

I object to the proposed rulemaking in Sections 665.160 and 665.630 of the Child Health Examination Code for Illinois' new eye exam law.

The purpose of the new examination law was to help identify students who might have vision problems that affect school performance. When comparing the current State of Illinois form to the Vision First form submitted for consideration, there are several obvious differences. The current state form emphasized the medical/health condition of the student's eyes. While important, it is not a significant consideration in this age group in relation to school performance. Use of this form would most likely miss critical visual efficiency learning-related skills.

The Vision First form goes into a greater depth of testing in the areas of visual efficiency skills, which are important in school performance. More students with significant vision problems will be identified by use of the Vision First form.

In addition, the Vision First form has several nice explanations of the relation of various visual skills to performance and behavior. This is very beneficial to parents and teachers in understanding vision's role in a school environment. The current state form has no such explanations.

While the current Illinois form may be acceptable using minimal standards, it is this practitioner's opinion, after 29 years of practice in the area of learning-related vision care, that the Vision First form is superior and would be more of a benefit to the students of the State of Illinois.

I urge the Department of Public Health to approve the Vision First form as proof of an eye examination.

Sincerely,

Thomas Poswilko, OD