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FROM: Dr. Richard T. Trask

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Dear Sirs:

It has been brought to my attention that a decision is planned to make colored contact lenses a decorative device and remove them from classification as a medical device.

I cannot emphasize enough that this is a serious mistake and will perform an injustice to the consumers of such colored contact lenses. I have practiced optometry for 32 years, and I have never found that the contact lens consumers can be left to their own judgment in matters of their eye care and contact lens usage. The very most serious problems that I have witnessed first hand in my clinical practice and emergent care hospital practice have always been related to contact lens abuse, especially colored contact lenses.

The worst cases have involved teenagers purchasing colored contact lenses from classmates out of school lockers and beginning to wear them without any assessment of fit and no training as to appropriate wear, solution use, or remedy for problems. I have had similar experiences with adults purchasing colored contact lenses from hairdressers and beauticians, all again without any form of training, supervision or follow-up for problems. I was made aware of these circumstances through the adverse events suffered by these patients. These events included corneal ulcerations, advanced inflammatory conditions, and abrasions.

The single event that would have prevented any of these adverse occurrences would have been the initiation of the patient's contact fitting by a licensed eye care professional. To remove the care of non-prescription, cosmetic colored contact lenses from the hands of appropriate eye care professionals will lead to epidemic proportions of adverse ocular events. These items are safe, but only when dispensed and supervised by the appropriate eye care professional.

Thank you for your interest in my comments.

Richard Trask, OD, MSHSA

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