

Addendum to the Initial Statement of Reasons

Title 13, Division 1, Chapter 1

Article 2.0- Driver's Licenses and Identification Cards

Section 20.03 – Vision Screenings

The Department of Motor Vehicles is proposing to make modifications to the originally proposed regulation provided for public comment from August 16, 2024 through September 30, 2024. The department is modifying the originally proposed text to incorporate suggestions received during the public comment period.

§ 20.03. Vision Screenings.

The department is proposing to change the name of Section 20.03 from “Vision Tests” to “Vision Screening.” Subsection (a) is also amended to replace the word ‘test’ with ‘screening.’ As explained in comments received by the department, the term “screening” more appropriately describes this part of the licensing process, and it should not be mistaken for an actual vision examination. The department has determined this amendment will not materially change any requirement of the regulation, as originally proposed.

Subsection (b)(2)(B) is amended to remove the requirement that the optometrist's or ophthalmologist's letter be prepared on their letterhead. This subsection caused confusion as some optometrists and ophthalmologists who work for clinics or are a part of a larger practice will not likely have their own letterhead, but will have the letterhead for the practice or clinic. While letterhead from a practice or clinic will be acceptable, the department determined it would be clearer to remove reference to letterhead altogether.

Subsection (b)(2)(B)5. is amended to make clear that the medical license number provided in the optometrist's or ophthalmologist's letter must be a California medical license number. The department has determined this amendment is non-substantive and does not change any responsibility of the regulation as originally proposed.