

Dear House Committee Members,

I would like to convey my concerns regarding bill S.64 and its potential risks to patient safety.

Safe eye surgery should be provided only by ophthalmologists, eye physicians and surgeons who are residency-trained by nationally accredited programs in hospital settings.

I am a physician and eye surgeon who has practiced rural comprehensive ophthalmology for 27 years, 10 in Oklahoma, and 17 here in Vermont. During my time in Oklahoma, I witnessed many instances of patient harm which were a direct result of optometric scope expansion legislation allowing optometrists to perform eye surgeries without appropriate training and without appropriate oversight by state professional boards.

- This bill risks patient harm

The reciprocal endorsement language in this bill would allow inexperienced optometrists from other states to perform laser and eyelid surgeries on Vermonters AND serve as preceptors to certify others. This is deeply concerning. These optometrists may NEVER have performed any of the proposed lasers or eyelid surgeries on a living patient and are almost certainly not performing all of these surgeries as part of their regular practices. They have neither established nor maintained any critical surgical competencies yet would be allowed to serve as certifying preceptors?

Advanced procedure licensure in other states can be obtained by attending long weekend courses and passing board exams using simulations and models. Such licensing does not even come close to ensuring that an optometrist is competent to perform laser or eyelid surgeries. In one recent and very unfortunate case (involving the acceptance of less rigorous Canadian board scores), a patient ended up being blinded by one of the “quick and simple” laser treatments on the proposed Vermont optometric advanced procedure list.

Allowing endorsements and optometric preceptors for certification risks inappropriate care and patient harm to Vermonters.

- This bill will not improve access to primary eye care

With no evidence or supporting data, Vermont optometrists (and optometrists nation-wide) have claimed "lack of access" to support advanced procedure licensure. Ophthalmologists in every region of this state are available, experienced, and appropriately trained to perform all the lasers and eyelid surgeries on the

optometric advanced procedures list. In my own independent practice, wait times are 1-3 weeks for any of the listed “advanced procedures”. (These are all lasers and eyelid surgeries I routinely perform in my office.) Despite this, local patients are frequently referred to Burlington for lasers and eyelid procedures. Referral patterns like this have the potential to falsely inflate access barrier claims, at least in my practice area.

Access to eye surgery is not lacking in Vermont. Access to primary eye care is lacking in Vermont. (Ask your constituents about their wait times for a routine eye exams.) Expanding optometric scope to include eye surgery is not the answer to access issues. It will not result in an influx of new optometric providers to this state. It may result in inappropriate or unnecessarily risky care delivered by undertrained or inexperienced providers. Ocular lasers and eyelid surgeries are not simple and require experienced hands with ongoing competency.

Please maintain the highest standards of patient safety for eye surgery in Vermont. Safe eye surgery should remain solely within the scope of ophthalmologists who are physicians and highly trained surgeons.

Sincerely,
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