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To: Nicholas Adams, Vermont Legislature

From: Kelsie George, NCSL Health Program

Topic: Optometrist Scope of Practice

Dear Nicholas,

Thank you for reaching out to NCSL regarding [Vermont SB 64 \(2026\)](#), “An act relating to amendments to the scope of practice for optometrists,” and comparable laws in other states. This memo includes background information and state examples.

Please let us know if you need any additional information.

Please note NCSL takes no position on state legislation or laws mentioned in linked material, nor does NCSL endorse any third-party publications; resources are cited for informational purposes only.

Best,

Kelsie George

Optometrists

Doctors of optometry (O.D.s/optometrists) provide more than two-thirds of primary eye health care in the U.S., [according to the American Optometric Association](#). Optometrists are one of three types of eye care providers, alongside [ophthalmologists](#) (specialists who focus on more advanced surgical procedures) and [opticians](#) (who fit and/or fulfill corrective eye wear at the direction of either an optometrist or ophthalmologists). As health care providers, optometrists are trained to examine, diagnose, treat and manage eye disorders, diseases and injuries that manifest in the eye. In addition to providing eye and vision care, they may also play a key role in an individual's general health and well-being. Optometrists can detect systemic diseases, provide vaccinations and prescribe medications.

Education and Training

Optometrists generally must complete a Doctor of Optometry degree. There are 25 schools of optometry in the U.S., located in 16 states, [according to the Association of Schools and Colleges of Optometry](#).

Within the field of optometry, professionals may provide comprehensive primary care practice or may specialize in a particular population or type of practice. [According to the Association of Schools and College of Optometry](#), optometry school graduates may specialize in several categories or emphasis areas during their clinical residency training, including:

- Primary care optometry
- Pediatric optometry
- Family practice optometry
- Community health optometry
- Geriatric optometry
- Cornea and contact lenses
- Ocular disease
- Refractive and ocular surgery
- Anterior segment
- Glaucoma
- Retina
- Neuro-optometry
- Vision rehabilitation
- Vision therapy and vision rehabilitation
- Low vision rehabilitation
- Brain injury rehabilitation

Licensure Requirements

States establish licensure requirements—like education, training, exams, age, and fees—by statute or delegate authority to licensing boards to set them in administrative code.

Every state requires optometrists to complete a Doctor of Optometry degree. States may also require a certain number of hours of classroom or didactic training, as well as supervised clinical training, prior to licensure and practice. Among neighboring states, Connecticut, Maine, and Massachusetts specify didactic and clinical training hour requirements for licensure, while New Hampshire, New York, Rhode Island, and Vermont do not.

[Vermont SB 54](#) would set preceptorship requirements of at least 8 hours under the clinical supervision of an optometrist or ophthalmologist for licensees to obtain an advanced therapeutic procedures specialty.

OPTOMETRIST LICENSURE REQUIREMENTS: SURROUNDING STATES

State	Fee	Degree	Training	Examinations	Age	Continuing Ed.	Licensure Cycle
Vermont	\$225	Doctor of Optometry	n/a	<ul style="list-style-type: none">• NBEO Part I, II, and III• TMOD	18	40 hours	Biennial
Connecticut	\$565	Doctor of Optometry	<ul style="list-style-type: none">• 96 classroom hours• 14 clinical hours	<ul style="list-style-type: none">• NBEO Part I, II and III• TMOD	n/a	20 hours	Annual
Maine	\$300	Doctor of Optometry	<ul style="list-style-type: none">• 100 hours of training in ocular therapeutics.• 25 hours of supervised clinical training.	<ul style="list-style-type: none">• NBEO Part I, II and III• TMOD• Maine Law Exam	18	25 hours	Annual

Massachusetts	\$460	Doctor of Optometry	<ul style="list-style-type: none"> 90 hours of didactic instruction. 30 hours of supervised clinical education relating to the use of therapeutic pharmaceuticals. 	<ul style="list-style-type: none"> NBEO Part I, II and III TMOD Law examination by the board of optometry 	18	18 hours	Annual
New Hampshire	\$325	Doctor of Optometry	n/a	<ul style="list-style-type: none"> NBEO Part I, II and III TMOD Law and clinical proficiency examination 	18	50 hours	Annual
New York	\$377	Doctor of Optometry	n/a	<ul style="list-style-type: none"> NBEO Part I, II and III TMOD for certification of use of therapeutic pharmaceutical agents 	21	36 hours for certification of use of therapeutic pharmaceutical agents	Triennial
Rhode Island	\$380	Doctor of Optometry	n/a	<ul style="list-style-type: none"> NBEO Part I, II and III TMOD 	n/a	20 hours	Annual

Source: *Optometrists, Knee Regulatory Research Center, West Virginia University (Accessed May 5, 2026)*

Examinations to determine optometrist licensee applicants' competency are administered by the [National Board of Examiners in Optometry \(NBEO\)](#). Examinations include [Part I Applied Basic Science](#), [Part II Patient Assessment and Management](#), [Part III Patient Encounters and Performance Skills](#) and [Treatment and Management of Ocular Disease \(TMOD\)](#). According to the Knee Regulatory Research Center at West Virginia University, every state requires NBEO Parts I, II and III. At least 40 states and Washington, D.C. (including Vermont) require TMOD for optometrist licensure. Many states also require jurisprudence, law or other similar examinations to ensure compliance with all state laws and regulations regarding optometry practice.

NBEO also offers examinations on [Injection Skill](#), [Laser and Surgical Procedures](#), [Advanced Competence in Medical Optometry](#) and [State Law Examinations](#). Some states may require these additional examinations, like Alaska and Louisiana, which require the Injection Skills Examination for licensure. Oklahoma requires licensed optometrists to complete the [Laser Therapy for Anterior Segment Course](#) offered by Northeastern State University prior to taking national examinations.

States may also define continuing education requirements that a licensee must complete in order to renew their license to practice in the state. New York only requires continuing education for optometrists who have certification to use or prescribe therapeutic pharmaceuticals within the state. State licensure cycles for optometrists vary; while most states are on an annual (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island) or biennial cycle (Vermont), New York follows a triennial cycle.

ADDITIONAL STATE-ADMINISTERED CERTIFICATIONS

Most states license one level of optometry practice, though the initial and continuing education and training requirements and scope of practice may vary greatly. ***NCSL staff were not able to identify any states that have established an advanced practice level of licensure to allow an expanded optometry scope of practice***, though Arkansas and New York provide certification or approval for an additional level of practice within optometry for licensees who completed their education before a certain date.

- [Arkansas](#) licenses both optometrists and optometric physicians ([Ark. Stat. 17-90-301](#)). Optometrist licensure is for licensees who do not meet the current standards for licensure as an optometric physician, but who were licensed as an optometrist before July 1, 2003. Optometrists with certification from the Board of Optometry to practice as "optometric physicians" may also perform primary eye care procedures with topical anesthesia and prescribe and administer all oral and topical drugs to treat the eye, lid and adnexa ([Ark. Admin. Code II.I.1](#)).
 - [New York](#) licenses optometrists and provides additional certification in the administration of topical diagnostic pharmaceuticals ([N.Y. Education Law 7100](#)). Licensees who graduated from a school of optometry after January 1, 1984 include training required
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to obtain certification. New York requires licensees to pass the NBEO TMOD examination to be certified ([N.Y. Education Admin. Code 66.5](#)).

Scope of Practice

Optometrists are trained to examine, diagnose, treat and manage eye disorders, diseases and injuries that manifest in the eye. In addition to providing eye and vision care, they may also play a key role in an individual’s general health and well-being. Optometrists can detect systemic diseases, provide vaccinations and prescribe medications.

States define the *scope of practice*, or the activities an optometrist is authorized to perform under their license to practice within the state, through statute and administrative code. This may include defining which controlled substances they are authorized to prescribe or administer, which ophthalmic procedures they are authorized to perform, or what types of injections they are allowed to administer under certain circumstances.

VERMONT EXISTING STATUTE AND PROPOSED BILL CHANGES

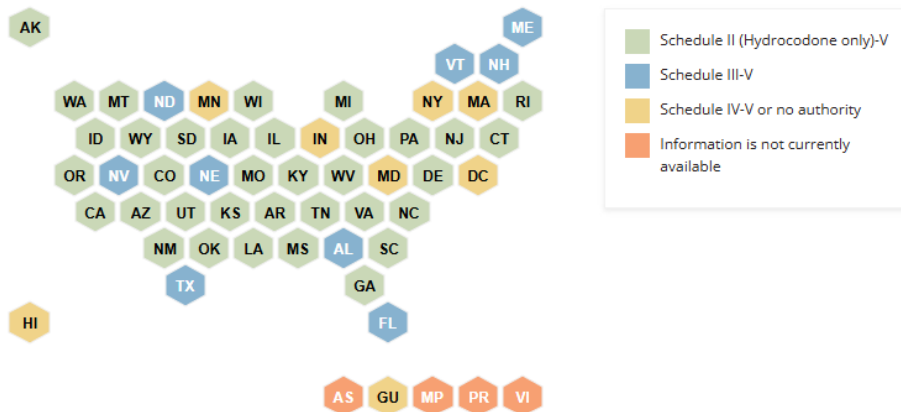
[Vermont Statute tit. 26 §1703\(2\)](#) defines the practice of optometry to include examining the human eye and visual system; diagnosing and correcting anomalies; prescribing appropriate pharmaceutical agents for diagnosis, management, treatment; removing superficial foreign bodies; and managing certain types of glaucoma in patients 16 years or older.

In addition to this level of optometrist licensure, [Vermont SB 64](#) would establish an advanced therapeutic procedures specialty that includes surgery to remove lesions, certain laser procedures and injections of therapeutic pharmaceutical agents. Therapeutic pharmaceutical agents are defined as “prescription or prescription drugs used or prescribed for the diagnosis, prevention, treatment or mitigation of abnormal conditions and pathology of the human eye or its adnexa,” and do not include any drug or substance administered by intraocular injection or intraocular implementation.

PRESCRIPTIVE AUTHORITY

[Vermont SB 64](#) would allow optometrists to prescribe or administer hydrocodone in combination with analgesics, and limit prescriptions to 72 hours with no refills. [At least 35 states allow optometrists to prescribe Schedule II-V controlled substances](#), but limit Schedule II substances to hydrocodone or hydrocodone-combination drugs only, as shown in the map below.

OPTOMETRIST PRESCRIPTIVE AUTHORITY BY STATE



Source: *Scope of Practice Policy – Optometrists*, NCSL (October 2025)

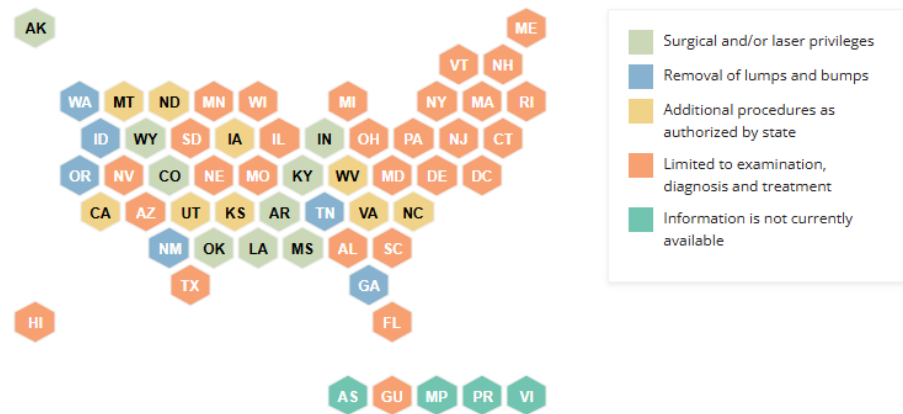
According to the [Knee Regulatory Research Center](#), almost every state that allows hydrocodone-only Schedule III prescribing (except Idaho) requires licensees to complete NBEO Parts I, II and III and TMOD examinations for licensure. Arkansas, California and Colorado require clinical experience or training hours under the supervision of an ophthalmologist.

AUTHORITY TO PERFORM OPHTHALMIC PROCEDURES

Vermont Statute tit. 26 §1703(2) limits optometrist practice to examination, diagnosis and treatment and does not include ophthalmic procedures such as surgery, laser, removal of lumps and bumps or other procedures. Vermont SB 64 bill would allow licensees to hold an advanced therapeutic procedure specialty to perform the following ophthalmic procedures:

- Surgery to remove lesions from the eye and adnexa.
- Laser capsulotomy, laser peripheral iridotomy and laser trabeculoplasty.

OPTOMETRIST AUTHORITY TO PERFORM OPHTHALMIC PROCEDURES BY STATE

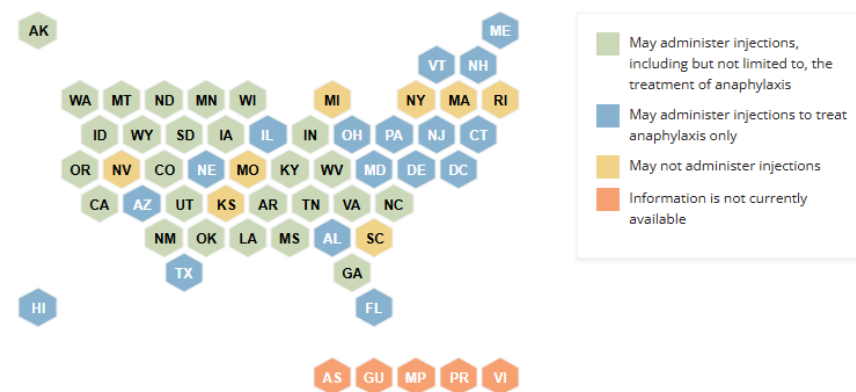


Source: Scope of Practice Policy – Optometrists, NCSL (October 2025)

INJECTABLE AUTHORITY

Optometrists can administer injections depending on state law. The most common injection optometrists administer are those related to the treatment of anaphylaxis. Some states allow optometrists to administer other types of injections if a patient is unresponsive to oral medications. Some states allow optometrists to administer vaccinations, including the COVID-19 vaccine.

OPTOMETRIST INJECTABLE AUTHORITY BY STATE



Source: Scope of Practice Policy – Optometrists, NCSL (October 2025)

Vermont Statute tit. 26 §1703(2) only allows optometrists to provide injections to treat anaphylaxis. Vermont SB 64 bill would allow licensees holding an advanced therapeutic procedure specialty to perform the following injections:

- Injections of therapeutic pharmaceutical agents into the eyelid or adnexa.
- Injections for the removal of chalazion.
- Injections to administer local anesthesia.
- Injections to perform fluorescein angiography.
- Injections of epinephrine or treatment of anaphylactic shock.
- Vaccines authorized by the Commissioner of Health.

The table below includes examples of the types of injections that optometrists are authorized to perform under statute or administrative code in other states. *Please note, this list is not exhaustive.*

State		Epinephrine for anaphylaxis	Vaccines	Fluorescein angiography	Administer local anesthesia	Removal of chalazion	Therapeutic pharmaceutical agents	Needle drainage
Vermont	SB 64 (Pending)	x	x	x	x	x	x	
California	Cal. Business and Professions Code §2-7-3041(d)	x	x	x				
Colorado	Colo. Rev. Stat. §12-275-103(1)	x	x		x	x		
Iowa	Iowa Code 154.1(3)(b)	x				x	x	
Minnesota	Minn. Stat. §148.56 (7)	x			x	x	x	
Mississippi	Miss. Code. Ann. §73-19-1	x			x	x	x	x
South Dakota	S.D. Codified Laws §36-7-1	x			x	x	x	

ADDITIONAL RESOURCES:

- [Scope of Practice Policy – Optometrists, NCSL](#)
- [American Optometric Association](#)
- [Association of Schools of Optometry](#)