



128 State Street, Montpelier, VT 05633
802-828-2363 | sos.vermont.gov

State of Vermont
Office of the Secretary of State
Office of Professional Regulation
89 Main Street, 3rd Floor
Montpelier, VT 05633-3402

Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary

Jennifer B. Colin, Director

May 6, 2026

To: Hon. Matthew Birong, Chair
House Committee on Government Operations and Military Affairs

From: S. Lauren Hibbert, Deputy Secretary of State
Emily A. Carr, General Counsel, Office of Professional Regulation

Re: S.64, An act relating to amendments to the scope of practice for optometrists

Dear Committee Members:

Thank you for the opportunity to testify in support of S.64, which expands the scope of practice for specially trained optometrists to perform advanced surgical, injection, and laser procedures.

OPR Overview

As a reminder, Vermont's Office of Professional Regulation (OPR) is a division within the Secretary of State's Office. Its mission is to protect the public from incompetent or unethical practitioners through a system of licensure. We achieve this by supporting boards and advisor groups that oversee licensure of over 50 professions and approximately 80,000 licensees. Among the 50 professions is Optometrists. Ophthalmologists are regulated by the Board of Medical Practice.

OPR Sunrise Assessment

Efforts to expand the optometric scope of practice to allow advanced surgical, injection, and laser procedures have been ongoing for years. OPR began working on a sunrise review in 2019 and released two reports, one in [2020](#) and a [revised report in 2023](#). Initially, when OPR first studied and assessed a potential scope expansion, the agency did not support it because optometric educational programs did not respond to

requests for information about the extent to which the advanced procedures were taught and practiced in U.S. optometry schools.

In 2023, at the request of the Senate Government Operations Committee, OPR updated its sunrise research and received substantial information about standard education in optometry schools, as well as conducted an in-depth review of all other jurisdictions in which advanced procedures are permitted. OPR reviewed reporting and information from all states that authorized optometrists to perform advanced procedures and the qualifications those states required. The list of allowed procedures in S.64 is based on the advanced scope for optometrists permitted in other jurisdictions.

The 2023 Revised Report found that:

- the standard coursework in all U.S. optometry educational institutions provides a strong foundation for optometrists to provide the advanced procedures that are now included in S.64;
- All U.S. optometry schools teach these procedures through didactic instruction, as well as laboratory and simulated experience.
- Optometry students practice standard optometric procedures on live patients, but for these advanced procedures, the majority of schools provide skills training primarily in lab simulations or on models.

Based on its findings, OPR recommended additional hands-on skills training on human subjects to sufficiently complete advanced procedures training and ensure public safety. With the additional training and demonstrated competency through a written examination and a skills examination, OPR determined optometrists could safely perform the advanced surgical, laser, and injection procedures in S.64.

Other U.S. Jurisdictions that Allow Optometrists to Perform Advanced Procedures

There has been testimony this year that 25 states currently allow optometrists to practice at higher level than Vermont. The advanced procedures in S.64 were primarily based on model legislation from the American Optometric Association, the education provided in optometry schools, and procedures allowed in other states. Of the 25 states that allow higher practice, 14 states currently allow an expanded scope of practice for optometrists that is substantially similar to the scope allowed in S.64 and have less stringent requirements. Those states are:

- Alaska (since 2017);
- Arkansas (since 2020);
- Colorado (since 2022);
- Indiana (since 2019);
- Kentucky (since 2011);
- Louisiana (since 2013);
- Mississippi (since 2021);
- Montana (since 2025);

- Oklahoma (since 1998);
- South Dakota (since 2024);
- Virginia (since 2022);
- West Virginia (since 2025);
- Wisconsin (1990);
- Wyoming (2021).

These 14 states have different qualifications and requirements, with the broadest, like Colorado, including advanced procedures in the definition of the practice of optometry and not requiring any additional qualifications from post-1993 optometry school graduates. Other states require a 32-hour educational training in the procedures and related topics or demonstration that education included substantially equivalent training. Several states have a list of prohibited procedures. Some states, like Mississippi, require the national written and clinical skills examinations, others do not. Some states require proctored procedures on live human patients, others do not. The Committee also heard that currently 21 states allow injections and surgical procedures to remove lumps and bumps. Based on OPR's recommendation to ensure public safety, S.64 includes training, testing and reporting requirements that will make Vermont's law among the more stringent of jurisdictions that permit the higher scope of practice.

Scope Expansion Authorized in S.64

S.64 expands optometric scope of practice for Vermont optometrists through an advanced therapeutics procedures specialty. To qualify for the specialty, a duly licensed optometrist must satisfy the education, training, and experience requirements, which include an 8-hour clinical training with hands-on experience performing specific procedures under the supervision of a qualified and licensed proctor. For applicants who graduated from optometry school before 2019, they must complete an additional 32-hour post-graduate course on the advanced procedures. All applicants must pass national written and clinical examinations, including skills examination. The fee for the credential is \$100.

S.64 identifies specific surgical, laser and injection procedures the specialty holder may perform, as well as procedures optometrists are prohibited from performing. Advanced procedures specialty licensees must also complete five hours of continuing education on the advanced procedures every two years to renew the specialty. In addition, S.64 requires an optometrist to report to OPR any adverse event related to an advanced procedure within 30 days.

The Benefit of Expanding the Scope to Allow Advanced Procedures

The allowance of these advanced procedures to be performed by optometrists is expected to increase patient access to care, particularly in rural areas where there are not ophthalmologists. Vermont has 33 ophthalmologists and 168 optometrists. There has been testimony that almost every county in Vermont has at least 3 optometrists, significantly greater numbers and more widespread than ophthalmologists. Further, OPR was not aware of any malpractice or complaint data demonstrating that optometrists with advanced training have higher rates than ophthalmologists of errors, complications, or bad outcomes.