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

Jennifer B. Colin, Director

April 15, 2026

To: Hon. Alyssa Black, Chair
House Committee on Health Care

From: S. Lauren Hibbert, Deputy Secretary of State
Jennifer B. Colin, Director, 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 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.

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.