

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 over 25 years, the first 10 of which were in Oklahoma. I can cite numerous examples of patient harm during my time in Oklahoma which were a direct result of optometric scope expansion legislation, allowing optometrists to perform eye surgeries.

Many optometrists who have obtained "advanced procedure" licensure in other states, including Oklahoma, have done so by attending extended weekend courses and passing laser/lid surgery board exams with simulations. Such "advanced procedure" licensing processes do not ensure that an optometrist is competent to perform laser or eyelid surgeries. In one 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 Vermont optometric scope expansion list.

S.64's reciprocal endorsement language would allow inexperienced and undertrained optometrists from other states to perform laser and eyelid surgeries on Vermonters AND serve as preceptors to certify others. These preceptor optometrists may never have performed any of the proposed lasers or eyelid surgeries on a living patient and are almost certainly not performing these surgeries as part of their regular optometric practices elsewhere. They have neither established nor maintained critical surgical competencies. Endorsements and the use of optometric preceptors for advanced procedure licensure unnecessarily risks inappropriate care and patient harm to Vermonters.

Proponents of S.64 argue that it will increase access to primary eye care. It will not. Lasers and eyelid surgeries are not primary eye care.

Another argument Vermont optometrists have been using is lack of access to "advanced procedures". We have seen no evidence showing this to be true. There are ophthalmologists in every region of this state who are available, experienced, and appropriately trained to perform all the lasers and eyelid surgeries on the optometric procedures list. In my own independent rural practice, wait times for any of the listed "advanced procedures", (which I perform routinely in my office), is 1-3 weeks.

[Wait times for retina or other sub-specialty ophthalmology appointments should have no bearing on this legislation.]

I find it perplexing that optometrists working in MD/OD group practices are claiming lack of access to "advanced procedures". I am also perplexed by optometrists who send their patients an hour away for surgeries that can be performed by an ophthalmologist less than a mile away yet still claim lack of access. Access to eye surgery is not lacking in Vermont. Access to primary eye care is lacking in Vermont.

S.64 presents an unacceptable risk to eye safety in Vermont. Please ensure our state maintains the highest standards of patient safety for eye surgery and does not capitulate to those seeking to lower the bar. Safe eye surgery should remain solely within the scope of ophthalmologists who are physicians and highly trained surgeons.

Amy Gregory