I am writing to express my opposition to S.64. I have worked as an ophthalmologist in Vermont for almost twenty years. I also teach at our medical school; since 2014 I have directed our ophthalmology curriculum.

Although optometrists are called "eye doctors," they are not "medical doctors." Medical doctors attend medical school and residency, nearly a decade of training in medical and surgical expertise. By comparison, optometrists receive no training at schools of medicine. S.64 would allow optometrists to perform surgery after a nominal introductory course. There is simply no comparison between a cursory introduction and the years-long rigor of education and mentorship that is the required standard for surgical skill.

It is crucial to recall that a nearly identical proposal went before the Vermont House in 2019. In response, the Office of Profession Regulation (OPR) conducted a nationwide study, evaluating safety, public health needs, cost, and access. OPR found conclusively against the optometrists. The study found that optometrists have no meaningful training as surgeons. The conclusion is unequivocal:

"After consulting with stakeholders and conducting extensive and thorough research, OPR cannot conclude that optometrists are properly trained in and can safely perform the proposed advanced procedures. Further, OPR finds that there is little need for, and minimal cost savings associated with, expanding the optometric scope of practice to include advanced procedures. For these reasons, OPR recommends against expanding the optometric scope of practice. . ."

There has been no change to these underlying facts. The only development has been a wave of lobbying and financial contributions, attempting to sway our legislature.

The optometrists I know are good and caring people. They are expert in the complex art of measuring glasses and contact lens. They are hard-working professionals who should be proud. But best intentions and personal decency do not yield qualification. None of them has attended medical school or surgical residency, the foundation for surgical proficiency.

When performing vital tasks, training and expertise matter. A master carpenter cannot safely work as a structural engineer. An airplane pilot cannot safely run the airport control tower. A trained soldier cannot safely perform neighborhood police duties. Lacking medical and surgical education, an optometrist cannot safely perform surgery.