

Date: February 18, 2026

Bill number: VT S64

Dear Chair Lyons, Vice Chair Gulick, and all distinguished members of the Senate Committee on Health and Welfare:

I appreciate the opportunity to comment on this bill. My name is Kihwan Bae, Ph.D., and I am a research fellow at the Knee Regulatory Research Center at West Virginia University. The center is a non-partisan research group, and this comment is not submitted on behalf of any party or interest groups.

My studies examine a broad range of implications of occupational regulations for healthcare workers. One of the studies shows that after states allowed optometrists to use medically necessary laser procedures, the number of Medicare beneficiaries treated with such procedures increased. More broadly, the study finds a decline in eye care deserts and a reduction in wait times for eye care after the policy reforms.

Given limited access to ophthalmologists, states have been expanding the role of optometrists in eye care. As of today, fourteen states have authorized optometrists to use ophthalmic surgical procedures to treat patients within the scope of their education and training. This bill would make Vermont the 15th state in the list. It is expected to fill a gap in medically necessary eye care, particularly for the elderly experiencing post-cataract complications in healthcare professional shortage areas.

As a safeguard against unskilled practice, the bill requires optometrists to obtain an advanced therapeutic procedures specialty – after completing additional education, preceptorship, and examination – before performing any surgical procedure. However, I have some reservations about the preceptorship requirement that mandates hand-on experience in six specific clinical procedures. Because some of these procedures are infrequently performed, this requirement could create a bottleneck in the pathway to obtaining the advanced therapeutic procedures specialty.

Taken together, research suggests that expanding the optometry practice scope to medically necessary surgical procedures is a way to improve access to eye care with little harm on public health and safety.

Sincerely,

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