



TO: Members of the Virginia State Health, Welfare and Institutions Committee – Subcommittee #1

FROM: American Osteopathic Association
Virginia Osteopathic Medical Association
American Osteopathic Colleges of Ophthalmology and Otolaryngology – Head and Neck Surgery

DATE: January 24, 2022

SUBJECT: House Bill 213

On behalf of the American Osteopathic Association (AOA), the Virginia Osteopathic Medical Association (VOMA) and the American Osteopathic Colleges of Ophthalmology and Otolaryngology – Head and Neck Surgery (AOCOO-HNS), we are writing to express our opposition to HB 213. This bill greatly expands the scope of practice for optometrists by allowing them to perform risky surgery on the eye without requiring them to attend medical school or complete comparable surgical graduate medical education (i.e. residency) to physician ophthalmologists, which ensures patient safety.

The AOA proudly represents its professional family of more than 168,000 osteopathic physicians (DOs) and medical students (OMS) nationwide. The AOA promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs and osteopathic medicine can be found at www.osteopathic.org. The VOMA is a professional medical organization that represents over 2,800 DOs and OMS providing patient care in Virginia. The AOCOO-HNS is a medical specialty organization that represents 945 osteopathic ophthalmologists and otolaryngologists nationwide.

Although optometry and ophthalmology share similar names and subject matter, they are significantly different. An optometrist holds a doctorate degree and a license to practice optometry, while an ophthalmologist is a specialized physician with a DO or medical doctor (MD) degree and a license to practice medicine. The tissue in and around the eye is extremely delicate and, if damaged, very difficult, if not impossible, to repair. For that reason, optometrists have historically been required to refer patients to an ophthalmologist for surgery because of the complexity of the procedures and seriousness of the potential outcomes, which can include blindness.

Our organizations support a “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. While we value the contributions of all health care providers to the health care delivery system, we believe that optometrists’ education and training lacks the comprehensive and robust requirements needed to safely perform the surgical procedures described in this bill.

Ophthalmologists’ education includes:

- **Four years of medical school**, which includes two years of didactic study totaling upwards of **750 lecture/practice learning hours** just within the first two years, plus two more years of clinical rotations done in community hospitals, major medical centers and doctors’ offices.
- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where physicians develop advanced knowledge and clinical skills relating to a wide variety of patient conditions. Residencies are completed over the course of **three to seven years under supervision by physicians** who have completed residency training and a comprehensive licensing examination series.
- Physicians also complete a **comprehensive, three-part licensing examination** series designed to test their knowledge and ability to safely deliver care to patients before they are granted a license to independently provide care to patients.

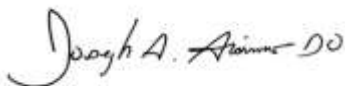
Optometrists’ education includes:

- Generally, a **four-year** doctorate-level degree in optometry, **110 combined hours of course work and clinical training** in general and ocular pharmacology, **one year of supervised experience**, and the completion of a **two hour course in preventing medical errors**.
- Optometry programs in the United States and Canada require clinical training for their students during their final academic year; however, the **length is unspecified**.
- **Typical clinical experiences vary in length from only eight to 16 weeks.**

Allowing optometrists, who patients often confuse for physicians despite the fact that they do not complete the rigorous training and testing requirements that physicians complete, to perform eye surgery without proving that they are qualified to do so safely, jeopardizes the health of Virginia’s patients and sets a dangerous precedent for other non-physician clinicians.

Optometrists are not physicians, and lack the education, training and competency demonstration requirements needed to perform independently deliver the services described in this bill. The AOA, the VOMA and the AOCOO-HNS urge you to protect patient safety by **opposing HB 213**. Should you need any additional information, please feel free to contact Raine Richards, JD, Senior Director, State Government Affairs at richards@osteopathic.org or (312) 202-8199.

Sincerely,



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