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February 7, 2021

House Committee on Health Care  
900 Court St. NE, H-282  
Salem, OR 97301

Dear Representatives:

The ophthalmologists of Oregon Eye Specialists are alarmed by the introduction of House Bill 2541 by the Oregon Optometric Physicians Association. The bill would allow optometrists to perform surgery on and around the eye even though optometrists do not complete medical school or a surgery residency and are not regulated by the Oregon Medical Board. HB 2541 will also reverse a prior bill requiring optometrists to consult with ophthalmologists in the management of complex, uncontrolled glaucoma which is a cause of irreversible blindness. Enactment of this legislation will compromise the safety and quality of eye care for Oregonians by removing the current standards of medical, clinical, and surgical training required to perform eye surgery. For this reason, we strongly urge you to oppose HB 2541.

As ophthalmologists, we appreciate the contribution that our colleagues in optometry make to the eye care team: many ophthalmologists work closely with optometrists on a daily basis. Optometrists are our friends and colleagues but there is a difference in training and expertise. Together, the American Academy of Ophthalmology and the American Optometric Association have worked to provide guidance to ophthalmologists and optometrists on the proper sharing of care. Granting optometrists surgical privileges for which they have not been adequately trained is unacceptable and jeopardizes patient safety.

Eye tissue is extremely delicate and once it is damaged, it is often impossible to fix. Surgeons consider eye surgery one of the most difficult and delicate surgeries to perform. HB 2541 allows optometrists to perform any ophthalmic surgery determined to be acceptable by the Oregon Board of Optometry, except for a short list of procedures specified in the bill. Optometrists could potentially perform hundreds of different types of eye surgeries using multiple modalities such as scalpels, lasers, needles, ultrasound, ionizing radiation and burn or freeze tissue. HB 2541 also enables optometrists to perform any eye surgery that may be developed in the future: all without appropriate and necessary medical training or experience.

Oregon has one of the best ophthalmology training programs in the country. These institutions adhere to the national education criteria set by the Accreditation Council for Graduate Medical Education (ACGME), which sets the minimum standards for becoming a qualified surgeon. Optometry training is not subject to the objective, proven, national ACGME standards, which include four years of undergraduate education, four years of medical school, one year of internship treating complex medical and surgical patients, and three years of ophthalmology residency. Often, an additional year or two of fellowship training is performed by ophthalmologists, to further master medical and surgical care. In total, ophthalmology training involves more than 17,000 hours of clinical experience and training. By contrast,

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the current optometric curriculum includes only a small fraction of the educational fundamentals established by the ACGME. Optometry school is limited to 2,300 hours of clinical experience with a focus on primary eyecare, which is insufficient to perform eye surgery. This legislation suggests that traditional medical and surgical training is no longer necessary to safely perform eye surgery and that strikes us as dangerously misguided.

Finally, HB 2541 may injure patients because it removes the requirement that optometrists consult with ophthalmologists on complex or uncontrolled glaucoma cases - a rule the Legislature previously enacted to protect Oregonians from this potentially blinding condition and ensure that they receive the appropriate care in a timely manner. This previous legislation has undoubtedly saved hundreds or even thousands of patients from permanent vision loss. Managing complex glaucoma cases requires medical training and surgical skills not taught in optometry school. Why reverse this successful law that is meant to protect patients?

Proponents of this bill argue that its aim is to increase access to eye care, however 92.3% of Oregonians live within 30 minutes of an ophthalmologist: access is not an issue in Oregon. We should not lower our safety standards under the guise of improving access to care.

In the interest of patient safety and to maintain the integrity of medical practice in the state of Oregon, we urge you vote NO for HB 2541.

Please feel free to contact us if you have any questions.

Sincerely,



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President, Oregon Eye Specialists

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