



April 15, 2016

The Honorable Anna MacKinnon
Chairwoman
Senate Finance Committee
State Capitol Room 516
Juneau, AK 99801

Dear Chairwoman MacKinnon:

The American Osteopathic Association (AOA) and the Alaska Osteopathic Medical Association (AKOMA) are writing to encourage you to oppose SB 55. This bill greatly expands the scope of practice for optometrists by increasing their prescription rights, including prescribing of controlled substances. This expansion of practice fails to include adequate changes in education, training or competency demonstration requirements for optometrists, and we are concerned that the passage of this bill could ultimately put the health and safety of Alaska patients at risk.

The AOA represents more than 123,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs, is the accrediting agency for osteopathic medical schools, and has federal authority to accredit hospitals and other health care facilities. More information on DOs/osteopathic medicine can be found at www.osteopathic.org. AKOMA is a professional organization that represents over 200 DOs providing patient care in Alaska.

Optometrists in Alaska are currently statutorily prohibited from prescribing Schedule IA, IIA or VIA controlled substances, and from prescribing other pharmaceutical agents in quantities that exceed four days of prescribed use, because their lack of education and training in this area could pose a potential danger to patient safety. Senate Bill 55 would delete these provisions, and replace them with language which allows optometrists to prescribe pharmaceutical agents, including controlled substances, without time restrictions, in accordance with standards to be adopted by the Board of Examiners in Optometry. This prescribing expansion for optometrists would come at a time when many states are moving to place greater restrictions on physicians prescribing controlled substances. Allowing optometrists to prescribe potentially dangerous controlled substances, after additional restrictions have been placed on physician prescribing elsewhere, undermines the state's obligation to protect patient safety.

Historically, only physicians have been permitted to prescribe potentially dangerous controlled substances, due to the risk that poor prescribing practices will harm patients. Osteopathic physicians' extensive medical education and training have prepared them to understand medical treatment of

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disease, complex case management and safe prescribing practices. Osteopathic physicians complete four years of medical school, followed by four to seven years of clinical residency programs. By the time osteopathic physicians are permitted to prescribe Schedule II controlled substances, they have completed 12,000 to 16,000 hours of supervised post-graduate clinical training.

In comparison, an optometrist's training generally includes a 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. While all optometry programs in the United States and Canada require clinical training for their students during their final academic year, the standards do not specify a minimal length. Typical clinical experiences vary in length from only eight to 16 weeks. This education and training is insufficient for the prescription of potentially dangerous controlled substances.

To protect the public's health and safety, health professionals' scope of practice must be based on their level of training, education, examination and competency demonstration. **We urge you to protect the safety of Alaska patients by opposing SB 55.** Should you need any additional information, please feel free to contact Nick Schilligo, MS, Associate Vice President, State Government Affairs at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



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President, AOA



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President, AKOMA

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