

# *Alaska Society of Eye Physicians and Surgeons*

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February 26, 2015

The Honorable Bert Stedman  
Chairman, Health and Social Services Committee  
Alaska Senate  
State Capitol Room 30  
Juneau AK, 99801

Dear Chairman Stedman:

We are writing today on behalf of the American Academy of Ophthalmology, the world's largest association of eye physicians and surgeons, serving more than 31,000 members worldwide, and on behalf of the Alaska Society of Eye Physicians and Surgeons, to ask for your opposition to SB 55. This legislation would permit optometrists, non-medical doctors who have neither completed medical school nor surgical residency, to perform surgery on and around the eye.

Our members strongly feel that SB 55 compromises the safety and surgical care of Alaska's eye patients by lowering the current standards of medical education and clinical training required to perform eye surgery. Lowering the surgical standards (as optometry is requesting) creates two separate and inconsistent sets of proficiency and credentialing requirements to perform the same surgery. This dual surgical standard authorized by SB 55 is not in the best interest of patient safety or quality of patient surgical care. Additionally, by allowing the Alaska Board of Examiners in Optometry to set its own licensure requirements, SB 55 would remove the Alaska State Medical Board's ability to fully ensure patient safety standards when it comes to operating on and around a patient's eyes. As a result, these provisions would place patients in harm's way and should be grounds for rejecting the legislation. The eyes of Alaska's citizens deserve better.

Although the legislation purports to prohibit optometrists from performing "invasive surgery," the bill's language is grossly misleading. SB 55 authorizes optometrists to perform surgeries using many different surgical techniques on the delicate structures of the eye. The bill's definition of "invasive surgery" is at odds with the surgery definition of both the American Medical Association and the American College of Surgeons. The supposed prohibition against invasive surgery as outlined in SB 55 is merely a short list of procedures optometrists could not perform, ignoring the fact that the language allows optometrists to perform any surgical procedure not listed. This would open the door for optometrists to perform dozens of surgeries—all of which are invasive—on the eye and surrounding tissues using scalpels, lasers, needles, ultrasound and other means.

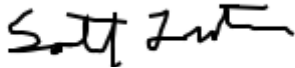
There are no shortcuts for learning how to safely perform surgery. All ophthalmologists—medical doctors and surgeons specializing in comprehensive eye care—train for four years in medical school, perform a one-year hospital internship, and train for three additional years (approximately 9,000 hours of hands-on training) in a surgical residency program before they can treat on their own. This training provides not only technical skills, but just as important, it instills the judgment to determine when not to operate. Moreover, ophthalmologists' clinical training prepares them how to manage potentially blinding or even fatal surgical complications that may arise. The fact that optometrists—non-physicians—would be able to perform all the surgeries authorized in this bill without ever having completed medical school and surgical residency is alarming, and puts Alaska's eye surgery patients at severe risk.

In addition to the surgical provisions, SB 55 would also remove existing safeguards placed upon the practice of optometry by the state legislature, which pertain to the prescription and administration of pharmaceuticals. SB 55 removes the existing safeguard against injections into the globe of the eye. For example, optometrists would now be authorized to inject medications directly into the small and delicate structures of the eyeball's anterior segment. Additionally, SB 55 would also authorize optometrists to inject Botox for therapeutic purposes and to alter or enhance cosmetic appearance. Both of these procedures have significant potential for causing harm; for instance, fatal anaphylaxis has been reported after Botox injections. Optometrists do not have medical training to cope with these sorts of complications.

In 2014, the Alaska State Legislature passed legislation allowing optometrists the continued authority to prescribe controlled substances containing hydrocodone. To ensure patient safety, the legislature determined that an optometrist's authority to prescribe these potent medications was restricted to a four-day limitation. Not only would SB 55 remove all restrictions on the authority to prescribe these and other controlled substances, but it would also expand optometry's authority to prescribe all Schedule Ia and IIa controlled substances, without limitations. These sets of drug classifications contain many powerful and highly addictive substances. This particular section of the bill would even remove the requirement of a physician-patient relationship in order to prescribe such potent drugs.

We respectfully ask that you uphold Alaska's current, high standard of patient safety by voting "no" on SB 55. Thank you for your strong consideration on this matter.

Sincerely,



Scott A. Linstrom, MD  
President  
Alaska Society of Eye Physicians and Surgeons



Russell N. Van Gelder, MD, PhD  
President  
American Academy of Ophthalmology

Cc: The Honorable Cathy Giessel, Vice Chair  
The Honorable Pete Kelly  
The Honorable Bill Stoltze  
The Honorable Johnny Ellis