

February 13, 2017

The Alaska State Senate  
Senate Health and Social Services Committee  
State Senator David Wilson, Chair  
State Capitol, Room 115  
Juneau, AK 99801

**RE: Oppose SB 36, An Act Relating to the Practice of Optometry**

Honorable Committee Members:

On behalf of the American Society of Plastic Surgeons (ASPS), I urge you to oppose Alaska Senate Bill 36, which would expand the scope of practice for optometrists beyond their professional training. As surgeons, we encourage you to maintain the high level of patient care that has been established and maintain current standards that permit only licensed Medical Doctors (MD) or Doctors of Osteopathic Medicine (DO) who meet appropriate education, training and professional standards to perform surgery in the ocular region.

If passed, SB 36 would allow non-physician optometrists to perform surgical procedures on the face. This includes procedures that fall squarely within the practice of medicine. SB 36 also grants the Alaska Board of Examiners in Optometry with complete authority over their own scope of practice, including determining what surgeries they are and are not qualified to perform. Alarming, the bill also does not include any educational requirements for optometrists to perform surgery. In sum, allowing optometrists to practice medicine without the requisite medical school and residency training would jeopardize patient safety and lower the standard of surgical care in the state.

SB 36 also gives optometrists the authority to use a wide range of pharmaceuticals that require a fundamental and systematic medical understanding of the human body. This understanding is gained through the clinical and educational rigor of a physician's training. Physicians are uniquely qualified to treat patients in the rare instance when an allergic reaction or some other life-threatening complication arises when these drugs are administered. Optometrists do not receive the same education and training ophthalmologists and plastic surgeons receive. Optometrists have insufficient training in disease management, for example, which is critical in identifying, understanding and effectively treating underlying conditions that can cause eye disease, like diabetes and hypertension. Sadly, in 2009, several patients at a VA facility received inadequate treatment for glaucoma from optometrists. An investigation found that as a result of the poor treatment 22 patients were found to have progressive vision loss.<sup>1</sup> Ophthalmologists and plastic surgeons must attain a core medical and surgical education while completing seven to ten years of training, which includes increasing responsibility and decision-making authority in the hospital setting. Optometrists only complete four to five years of education with significantly less clinical exposure and responsibility.

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<sup>1</sup> Dremann, Sue. VA investigates glaucoma patients' treatment: 'Exhaustive' internal review found inadequate referrals; optometry chief sidelined. Palo Alto Weekly, July 23, 2009.

Due to patient safety issues, such as the possibility of complications arising from surgery, it is critical that such procedures are performed by physician surgeons who have the comprehensive training and board certification to handle those complications when they do occur. We urge you to **OPPOSE** Senate Bill 36 in order to protect the high standard of patient safety in Alaska.

Please do not hesitate to contact Patrick Hermes, ASPS's Senior Manager of Advocacy and Government Affairs, with any questions at [Phermes@plasticsurgery.org](mailto:Phermes@plasticsurgery.org) or (847) 228-3331.

Sincerely,

A handwritten signature in black ink that reads "Debra Johnson MD". The signature is written in a cursive, flowing style.

Debra Johnson, MD  
President, American Society of Plastic Surgeons