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Senator David Wilson, Chairman
Health & Social Services Committee
State Capitol Room 115
Juneau AK, 99801

Dear Senator Wilson,

It is with disappointment and frustration that I find myself composing another letter regarding yet another Optometrist scope of practice expansion bill. You should know that I have absolutely no problem with the idea that Alaska Optometrists should have a state board and govern themselves. The problem with Senate Bill 36 is that the definition of optometry is dangerously incorrect. It is dangerous because it incorrectly uses the practice of ophthalmology in the definition of optometry. Optometrists are not trained in the practice of ophthalmology and they should not be granted the ability to practice ophthalmology without the proper training.

Optometrists consider themselves to be the "primary care" for eyes. In Alaska, they perform this task extraordinarily well. Optometry is defined as the practice of examining eyes for disease conditions, initiating treatment for common diseases such as glaucoma, and ensuring that the patient is in the correct spectacle or contact lens prescription. If a complex or surgical eye condition is identified, the patient is referred to a qualified eye physician and surgeon (ophthalmologist) for further diagnosis and treatment.

Ophthalmology is very different from optometry. Ophthalmologists are trained to identify disease conditions and treat with medicine or surgical procedures when appropriate. Senate Bill 36 asks for Optometrists to govern themselves in the practice of optometry but blatantly uses ophthalmology procedures and practice in the definition of optometry. This bill blurs that difference in a manner that is purposefully misleading and unsafe for patients in Alaska.

To become an ophthalmologist, one must complete a 4 year undergraduate degree, 4 years of medical school and then 4 years of residency training plus up to 2 years of fellowship training. In total, it takes up to 14 years after graduating high school to become an ophthalmologist with up to 6 of those years being dedicated to intense surgical training. In Alaska, there are 26 ophthalmologists and all of us have completed this pathway. During the course of this training, the individual learns how to be a surgeon. Being a good surgeon requires more skill than using instruments or energy sources such as laser to alter tissues for therapeutic or diagnostic purposes. Ethical surgeons learn when to do a procedure and when to simply observe the patient. They learn that the phrase "First, do no harm" is not just a motto, it is a

that any surgical or medical intervention could potentially be more harmful than the disease. This education and maturation does not happen overnight or with a weekend course. I used to be chief of a teaching program in the military, and 4-6 years is the bare minimum for this kind of apprenticeship.

Despite what is in the press, this is NOT a "turf war". That implies that education and training is the same, which it clearly is not. If any Optometrist in the state of Alaska wishes to perform surgery on the eye to include all laser procedures or intravitreal injections, they have the power to do so already. All they have to do is complete a four year medical doctor or doctor of osteopathy degree followed by a four year supervised ophthalmology residency program. Once they have completed this training, they can truly call themselves physicians and can perform ophthalmic procedures. In fact, I will be happy to help any Alaska Optometrist achieve this goal by writing letters of recommendation and contacting back channel sources to help them get into medical school and/or residency. In the course of my career, I have met several Optometrists who have gone to medical school and completed residency training, becoming qualified physicians.

The most difficult thing I have done in my 27 year career is teach residents. Before I retired from the Army, I was chief of ophthalmology at Brooke Army Medical Center in San Antonio, Texas. I supervised 10 staff ophthalmologists and 15 resident ophthalmologists in conjunction with the Air Force teaching hospital, Wilford Hall. It is in this capacity that I gained great respect for my mentors and the patience they endured when they were teaching me. It is also where I learned first hand that it takes the whole 4 years to produce a qualified surgeon. In fact, in recent years, there have been talks of increasing the basic ophthalmology training program to 5 years. After completing a 4 year residency, some ophthalmologists choose to spend an extra year or two refining their surgical skills in supervised fellowship programs. My partners and I, at Alaska Retinal Consultants have done this, giving us a very clear prospective regarding the effort it takes to learn how to safely perform invasive ocular procedures, to include laser and injections.

Senate a Bill 36 should be rejected. The definition of optometry is not correct and optometrists do not have the training or experience to be able to safely govern any ophthalmic procedure to include lasers and eye injections.

Thank you for your consideration.



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