



AMERICAN ACADEMY™  
OF OPHTHALMOLOGY

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*Alaska Society of  
Eye Physicians and Surgeons*

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January 30, 2017

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

Dear Chairman Wilson:

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 32,000 members worldwide, to ask for your opposition to SB 36.

SB 36 would permit optometrists, non-medical doctors who have neither completed medical school nor surgical residency, to perform scalpel and laser surgery on and around the eye. SB 36 also gives unfettered authority to the Alaska Board of Examiners in Optometry to authorize optometrists to perform dozens of surgical procedures—all of which are invasive—on the eye and surrounding tissues using scalpels, lasers, needles, ultrasound and other means. We strongly feel that this legislation compromises the safety and surgical care of Alaska's eye patients by removing the current standards of medical education and clinical training required to perform eye surgery.

There are no shortcuts in learning to safely perform surgery. An ophthalmologist trains for four years in medical school, performs a one-year hospital internship and trains for three additional years in a surgical residency program before he/she can treat on their own. This training provides not only technical skills, but just as important, it instills the judgment to determine when and when not to operate. Moreover, an ophthalmologist's clinical training prepares them how to manage potentially fatal surgical complications that may arise.

The fact that that optometrists—non-physicians—would be able to perform all the eye surgeries authorized in this bill without ever having completed medical school and residency is alarming, and puts Alaska's eye patients at severe risk. Also, as alarming is the fact that the Alaska Board of Examiners in Optometry would decide whether an optometrist's education, training and experience is sufficient to protect eye surgery patients in Alaska. Unfortunately, unlike the Alaska State Board of Medicine, the Board of Examiners in Optometry has no experience in determining qualifications to safely perform surgery.

SB 36 would also remove existing safeguards placed upon the practice of optometry by the state legislature pertaining to the prescription and administration of pharmaceuticals. For

example, SB 36 would authorize optometrists to inject medications into the small and delicate structures of the eye. Additionally, the legislation would also authorize optometrists to inject Botox for therapeutic purposes and also to alter or enhance cosmetic appearance. Anytime a needle is placed in or near the eye, there are serious risks to patients that require adequate clinical experience and judgment.

In 2014, the Alaska State Legislature passed legislation to continue to allow optometrists to prescribe controlled substances containing hydrocodone. During consideration of this prescription authority, the legislature continued the four-day prescription limitation to protect patients. SB 36 would not only remove hydrocodone and other controlled substances prescription time limitation, the optometric bill would also expand the controlled substances that optometrists would be authorized to prescribe to include all Schedule Ia and IIa controlled substances which are very powerful and highly addictive substances.

Last year, SB 55—a bill very similar to SB 36—failed in the legislature. We respectfully ask that you once again uphold these high standards for patient safety and quality surgical care by voting “no” on SB 36. Thank you for your strong consideration on this matter.

Sincerely

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CC: Members of the Alaska Senate Health and Social Services Committee