

RE: Opposition to S.64 – Amendments to the Scope of Practice for Optometrists

Dear Chair Lyons and Members of the Committee,

As an ophthalmologist practicing in Vermont, I am writing to express my grave concerns regarding **S.64**, which proposes to expand the scope of optometry to include laser and eyelid surgeries. I strongly urge this committee **not to pass S.64 out of your committee for a vote**.

While I value my optometric colleagues as primary eye care providers, surgery is a medical discipline that requires the extensive training provided only in medical school and surgical residency. My primary concern is for the **safety of Vermonters**. The eye is a delicate organ where a millimeter can mean the difference between sight and permanent blindness. Optometrists lack the thousands of hours of supervised clinical surgical experience required to manage the inevitable complications that arise during even "minor" procedures.

Evidence from other states demonstrates the real risk of patient harm:

- **Kentucky:** Since expanding their scope in 2011, there have been documented cases of **permanent vision loss** and chorioretinal scarring after optometrists allegedly used incorrect laser settings.
- **Oklahoma:** Case studies highlight instances where patients required emergency hospital transfers due to **uncontrolled hemorrhaging** during laser procedures that the performing optometrists were not equipped to manage.

Proponents argue this bill increases rural access, yet data from states like Kentucky shows no measurable improvement. Instead, it creates a two-tiered system where some Vermonters receive surgery from trained surgeons, while others are directed to providers with significantly less training.

Furthermore, the economic reality of maintaining a specialty practice in Vermont is increasingly fragile. Like all healthcare providers in our state, we face a widening gap between **declining reimbursements** and the **rising costs of overhead and operation**. If the surgical procedures that sustain our practices are eroded by S.64, many ophthalmology clinics will no longer be financially viable.

This leads to a stark prediction: if S.64 passes, **Vermont will see an exodus of ophthalmologists**. Many of my colleagues have expressed that they will seek to practice in states that maintain higher standards for surgical care and a more sustainable economic environment. Losing these highly trained surgeons will exacerbate the very "access to care" issues this bill claims to solve, leaving our state without the necessary medical experts to handle complex cases and surgical emergencies.

I ask you to prioritize patient safety and the stability of Vermont's surgical infrastructure. Please reject S.64.