

July 26, 2022

Optometry Technical Review Committee Members
Office of Research, Policy, & Quality Improvement
Department of Health & Human Services/Division of Public Health/Licensure
DHHS Licensure Unit
Attn: Credentialing Review
PO Box 94986
Lincoln NE 68509-4986

Dear Optometry Technical Review Members,

On behalf of the American College of Emergency Physicians and the Nebraska Chapter of the American College of Emergency Physicians, the leading organizations representing member physicians in Nebraska and across the United States, we are writing to express our opposition to the credentialing review proposal to expand the authorized scope of practice of optometrists to include laser surgical procedures.

As physicians, we value the team of professionals that work with us to provide care to patients. Optometrists, the same as nurses, physician assistants, and other important members of the health care team, are integral in the delivery of quality health care. However, it is important that non-physician health practitioners have defined scopes of practice based on their level of training and experience. Physicians have the unique education and training required to provide effective diagnosis, care, and treatment of the patient.

Recognizing that advances have been made in the safety of eye care, we still insist that it is important for quality patient care that most complex eye procedures should be performed by a properly trained physician or under the supervision of a physician. Most troubling with this proposal is the request for the authorization of optometrists to perform the laser eye procedure Selective Laser Trabeculoplasty. Even as trained and fully board-certified emergency physicians who routinely perform certain eye procedures, we recognize that laser eye surgery is a highly complex procedure that requires significant specialized training and experience and should continue to be limited to physician ophthalmologists.

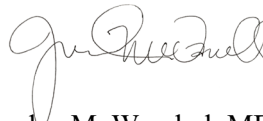
In the interest of patient safety and the delivery of quality care, we oppose this proposal.

Thank you for your consideration of these comments. If I can answer any questions, please feel free to reach out to us through Christopher Johnson, Senior Director of State Government Relations at cjohnson@acep.org.

Sincerely,



Gillian Schmitz, MD, FACEP
President
American College of Emergency Physicians



Jordan M. Warchol, MD, MPH, FACEP
President
Nebraska ACEP