

July 25, 2022

Office of Research, Policy, & Quality Improvement
Department of Health & Human Services/Division of Public
Health/Licensure
DHHS Licensure Unit
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## Dear Members of the Technical Review Committee:

The American Academy of Ophthalmology, the world's largest association of eye physicians and surgeons, serving more than 32,000 physicians worldwide, is writing to you today to ask that the Technical Review Committee make a recommendation against authorizing optometrists to perform selective laser trabeculoplasty (SLT) in Nebraska. Allowing optometrists to perform SLTs would place Nebraska glaucoma patients at risk by authorizing unqualified, non-medically trained eye care providers to perform this delicate eye surgery.

The proposal before you would create a two-tiered system for glaucoma patients who require surgical treatment. In Nebraska, current law requires licensees to gain their surgical expertise through years of medical and surgical training at institutions like the world-class UNMC College of Medicine and the Truhlsen Eye Institute. This proposal is an extreme departure from a standard that has served to minimize risks to Nebraska glaucoma patients for decades. This proposal seeks to create an abbreviated pathway for Nebraska optometrists to perform SLTs based upon a 16-hour weekend course and nominal clinical experience even though optometrists have no foundational surgical experience or expertise. In fact, the 16-hour laser course that is being taught to optometrists – often presented in a hotel - is not even completely devoted to topics pertaining to SLTs.

Our concerns are not theoretical. The limitations of optometrists' so-called "surgical" training to perform SLTs specifically were documented in a 2016 study published in the *Journal of the American Medical Association-Ophthalmology*, a leading academic journal in this field of medicine. The study found that glaucoma patients were nearly three times more

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likely to require repeat SLTs in the same eye when performed by an optometrist as opposed to SLTs performed by an ophthalmologist. The conclusion not only illustrates increased risks to glaucoma patients, it also shows that permitting optometrists to perform SLTs actually increases cost while reducing quality. To quote the investigators of the study, "Health policy makers should be cautious about approving laser privileges for optometrists practicing in other states."

We respectfully ask that as you deliberate on this important issue for Nebraska glaucoma patients, many of whom are seniors, that you consider the importance of the rigorously established and well proven methods of surgical education and training in treating this potentially blinding disease and recommend against optometrists performing SLTs. Optometrists play an essential role in delivering eye care to Nebraskans. Nebraska Academy members work collaboratively with optometrists. They are important members of the eye care team. However, no matter how well-intentioned Nebraska optometrists may be, optometrists are not appropriately trained to perform SLTs.

Thank you for your time and consideration.

Sincerely,

Robert E. Wiggin Jr

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