



July 25, 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

Re: Opposition to proposal authorizing optometrists to perform selective laser trabeculoplasty (SLT)

Dear Members of the Optometry Technical Review Committee,

On behalf of the more than 55,000 members of the American Society of Anesthesiologists (ASA), I am writing in strong opposition to the credentialing review proposal seeking authorization for optometrists to perform selective laser trabeculoplasty (SLT). Serious sight-threatening complications can result from SLT. Ophthalmologists undergo a decade or more of rigorous medical education and surgical residency training to safeguard against or address complications associated with this procedure.

Optometrists are qualified professionals offering a range of needed services. However, those services should not include surgical procedures. Optometrists are not sufficiently educated or trained to perform SLT nor are they prepared to address the variety of complications that can result from this surgery. The public trusts health care professionals to provide those services for which they can competently offer comprehensive care. The public should not be subjected to a potentially dangerous surgery on their eyes by nonphysicians with inadequate training and low experience.

Beyond safety concerns, expanding optometrist scope of practice in this area would not provide the public with enhanced access to care nor would it benefit from cost reduction. As it stands, studies have shown optometrists gravitate to those mostly urban areas where there are patients. There is also a likelihood of increased costs. Peer-reviewed research published by the Journal of the American Medical Association (JAMA) has shown that patients undergoing laser trabeculoplasty by an optometrist are more than twice as likely to require repeat surgery as opposed to an ophthalmologist.

There is no need for this scope of practice expansion and the public agrees. National surveys have shown time and again that the public expects their surgical and medical care to be from medical doctors and surgeons with experience and proven clinical skills. Nebraska ophthalmologists provide excellent access to care throughout the state. And that surgical care is provided is by qualified ophthalmic surgeons capable of addressing complications that may arise during the procedure.

Thank you for your consideration of our comments. Should you have any questions, please feel free to contact Jason Hansen, Director of State Affairs at [j.hansen@asahq.org](mailto:j.hansen@asahq.org).

American Society of **Anesthesiologists**<sup>®</sup>

Sincerely,

A handwritten signature in black ink that reads "Randall M. Clark". The signature is written in a cursive style with a large initial 'R' and a distinct 'M' and 'C'.

Randall M. Clark, MD, FASA  
President  
American Society of Anesthesiologists