

April 5, 2016

The Honorable Iris Y. Martinez
Chair, Committee Licensed Activities and Pensions
413 Capitol Building
Springfield, IL 62706

RE: Oppose Senate Bill 2899

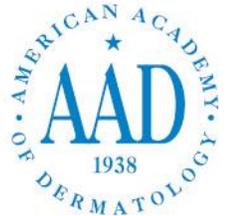
Dear Chairperson Martinez:

On behalf of the more than 13,500 members of the American Academy of Dermatology Association (AADA), we urge you to oppose Senate Bill 2899, which would expand the scope of practice of optometrists. This bill would allow optometrists to inject potent medications into the eyelid as well as to perform a wide variety of scalpel and laser surgeries on the eyelid without the necessary medical education and surgical training it takes to safely perform these delicate procedures. The AADA opposes this inappropriate scope of practice expansion for optometrists as we believe it disregards adequate and appropriate medical training, and jeopardizes patient safety.

Surgical Procedures Constitute the Practice of Medicine & Surgery; Not the Practice of Optometry

SB 2899 would authorize optometrists to surgically excise skin lesions on the eyelid. The AADA believes the practice of cutaneous medicine includes, but is not limited to, performing any act or procedure that, by its intended or improper use, can alter or cause biologic change or damage living tissue. Such acts or procedures include, for example, skin excisions, the use of all lasers, light sources, the injection or insertion of foreign or natural substances, or soft tissue augmentation. We maintain a steadfast position that these procedures should be performed only by a licensed physician or under the direct, onsite supervision of a physician.

Optometrists would be authorized to determine whether a lesion is noncancerous, which presents a significant patient safety risk due to optometrists' lack of medical education and training required to make such determination. Excising potentially cancerous lesions, prior to a full medical exam, could render a skin cancer undetectable, lead to the spread of cancer, or alter its pathology resulting in prolonged diagnosis or in some cases, death. As one out of five Americans will be diagnosed with skin cancer, allowing optometrists without the skills gained through a proper medical education and an extensive medical dermatology residency to perform biopsies of the skin and subcutaneous tissue around the eye and its appendages significantly endangers patient safety and disregards necessary specialty medical training.



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Optometric Training Does Not Prepare Optometrists to Perform Medical & Surgical Procedures

This bill substitutes an optometry school program, which focuses on basic eye care services like eye exams/refractions and contact lens fitting, for current physician-training standards requiring thousands of hours of medical education, clinical and surgical experience and other training. Authorizing the practice of surgery for those who completely bypassed medical school and residency is in no way a solution to ensure access to the safest patient care that the citizens of Illinois deserve.

As dermatologists, our utmost concerns are patient care and patient safety. Quality patient care includes evaluating a patient's needs and current condition, selecting an appropriate course of treatment, and providing adequate information and follow-up care. Short-term training is in no way equivalent to a physician's training and understanding of a medical procedure and its implications for each patient. Further, any surgical procedure faces the potential for complications from known or unknown causes or underlying, serious medical conditions. When complications occur, the patient deserves and expects to be treated by someone with the medical, clinical and surgical knowledge and experience to manage those complications to ensure the best possible patient outcome.

In order to protect the citizens of Illinois from potential adverse events and ensure quality care, the AADA urges you to oppose SB 2899. We appreciate the opportunity to provide written comments on this issue. For further information, please contact Lisa Albany, associate director of state policy for the AADA, at LAlbany@aad.org or (202) 842-3555.

Sincerely,

A handwritten signature in blue ink that reads "Abel Torres M.D., FAAD". The signature is written in a cursive style.

Abel Torres, MD, JD, FAAD
President
American Academy of Dermatology Association