



## AMERICAN COLLEGE OF SURGEONS

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February 25, 2016

The Honorable Pamela Althoff  
Illinois State Senate  
309 L Capitol Building  
Springfield, IL 62706

The Honorable Anna Moeller  
Illinois State House  
249-E Stratton Office Building  
Springfield, IL 62706

Dear Senator Althoff and Representative Moeller:

On behalf of the American College of Surgeons (ACS), I am writing to you to state our opposition to S. 2899/H. 6166, legislation which would significantly expand the scope of practice of optometry into the practice of surgery. The ACS has a long history of addressing matters relating to patient care and safety. While optometrists play a critical role in the treatment of Illinoisans, we are concerned that S.2899/H.6166 as currently written permits optometrists to perform surgery, which is beyond their education and training.

The ACS outlines the definition of surgery in the *Statement on surgery using lasers, pulsed light, radiofrequency devices or other techniques* ([http://www.facs.org/fellows\\_info/statements/st-11.html](http://www.facs.org/fellows_info/statements/st-11.html)). According to the statement “surgery is performed for the purpose of structurally altering the human body by the incision or destruction of tissues and is a part of the practice of medicine. Surgery is also the diagnostic or therapeutic treatment of conditions or disease process by any instruments causing localized alteration or transposition of live human tissue which include lasers, ultrasound, ionizing radiation, scalpels, probes, and needles.” The ACS statement also notes that any procedure that can damage the eye (cornea or retina) should only be performed by a licensed physician.

In the interest of patient safety and maintaining the highest standards of surgical care, the American College of Surgeons believes that the types of procedures proposed in S.2899/H.6166 should only be performed by a licensed Medical Doctor (MD) or Doctor of Osteopathic Medicine (DO) who meet appropriate education, training and professional standards. As such, the ACS strongly urges you to amend S.2899/H.6166 so that provisions permitting optometrists to perform surgery and administer injections are removed from the bill.

Sincerely,

David B. Hoyt, MD, FACS  
Executive Director

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