



February 25, 2016

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

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

RE: SB 2899/ HB 6166 – Optometric Practice Sunset Act

Dear Senator Althoff and Representative Moeller:

On behalf of the American Society for Dermatologic Surgery Association (ASDSA), a surgical specialty organization representing over 6,100 physician members across the nation, I am writing to urge you to reconsider the provisions in Senate Bill 2899 and House Bill 6166 that would greatly expand the optometric scope of practice to include surgical procedures outside their level of training. ASDSA believes that allowing optometrists to perform any surgical procedure places Illinois patients at serious risk of injury and permanent disfigurement.

We greatly respect the role that optometrists play in the treatment of patients, but their training is not adequate to perform complex surgical procedures. Surgical proficiency is acquired through years of medical education and clinical training. The optometry education model does not provide an in-depth surgical training experience for its students. Short term, basic training is not equivalent to a physician's training and understanding of medical procedures and the implications for each patient. When non-physicians are given legal approval to do the same procedures physicians spend years in medical and surgical training to perform, patient safety can be seriously compromised. There are no short cuts to a medical degree and acquiring the skill and judgment required to successfully perform delicate surgery and manage potential medical complications.

As defined by both the American Medical Association and the American College of Surgeons¹, surgery also includes the injection of diagnostic or therapeutic substances. These procedures are considered invasive and could cause serious complications including cardiac events, blindness, perforating the globe of the eye, allergic reaction or could also result in a drug entering the blood stream too quickly if a vein is inadvertently

¹ Definition of surgery. (2007). Retrieved February 25, 2016, from <https://searchpf.ama-assn.org/SearchML/searchDetails.action?uri=/AMADoc/HOD.xml-0-4317.xml>



injected. Medications injected into the ocular region should not be taken lightly and require continued education to ensure the highest levels of patient safety. The professional training of an optometrist does not offer sufficient education or experience to allow them to perform any level of surgery, including injectable procedures.

In the interest of protecting patients, we respectfully ask that you remove the provisions that would grant optometrists the authority to perform surgery, including injectables. Should you have any questions, please do not hesitate to contact Jake Johnson, Manager of Advocacy and Practice Affairs, at jjohnson@asds.net or by phone at 847-956-9145.

Sincerely,

A handwritten signature in black ink, appearing to read "Naomi Lawrence". The signature is fluid and cursive, written in a professional style.

Naomi Lawrence, MD, President
American Society for Dermatologic Surgery Association

cc: Thomas E. Rohrer, MD, President-Elect
Lisa M. Donofrio, MD, Vice President
Mathew M. Avram, MD, JD, Treasurer
Murad Alam, MD, MBA, Secretary
George J. Hruza, MD, MBA, Immediate Past President
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