

November 8, 2024
Board Room 4
9:00 a.m.

Agenda
Virginia Board of Optometry
Full Board Meeting

Call to Order – Gerald R. Neidigh, Jr., O.D., Board President	Page
<ul style="list-style-type: none"> • Welcome • Emergency Egress Procedures • Introductions • Mission Statement 	1

Ordering of Agenda – Dr. Neidigh

Public Comment – Dr. Neidigh

The Board will receive all public comment related to agenda items at this time. The Board will not receive comment on any regulatory process for which a public comment period has closed or any pending or closed complaint or disciplinary matter.

Approval of Minutes – Dr. Neidigh	Pages
<ul style="list-style-type: none"> • August 28, 2024 – Full Board Meeting (pages 2-5) • August 28, 2024 – Public Hearing (pages 6-7) 	2-7

Regulatory Report – Erin Barrett	Pages
<ul style="list-style-type: none"> • Regulatory Update <ul style="list-style-type: none"> ○ Current Regulatory Actions (page 8) • Consideration of final regulatory action regarding laser surgery (page 9) <ul style="list-style-type: none"> ○ Final regulations (pages 10-18) ○ Public comments (pages 19-173) 	8-173

Director’s Report – James L. Jenkins, Jr., RN, Chief Deputy Director

President’s Report – Dr. Neidigh

Board of Health Professions’ Report – Ms. Moss

Staff Reports – Dr. Neidigh	Page
<ul style="list-style-type: none"> • Executive Director – Ms. Moss <ul style="list-style-type: none"> ○ Board counsel ○ Staff updates ○ Statistics • Discipline – Claire Foley 	174

New Business – Dr. Neidigh

Next Meeting – Dr. Neidigh/Ms. Moss	Page
February 6, 2025	175

Meeting Adjournment – Dr. Neidigh

This information is in **DRAFT** form and is subject to change.

MISSION STATEMENT

Our mission is to ensure safe and competent patient care by licensing health professionals, enforcing standards of practice, and providing information to health care practitioners and the public.

Call to Order

The August 28, 2024, Virginia Board of Optometry meeting was called to order at 9:01 a.m. at the Department of Health Professions (DHP), Perimeter Center, 9960 Mayland Drive, 2nd Floor, Board Room 3, Henrico, Virginia 23233.

Presiding Officer

Gerald R. Neidigh, Jr., O.D., President

Members Present

Evan J. Kaufman, O.D., Vice President

Fred E. Goldberg, O.D.

Clifford A. Roffis, O.D.

Shawn H. Hobbs, O.D.

Member Attending Electronically

Corliss V. Booker, Ph.D., APRN, FNP-BC, Citizen Member, was approved by the President of the Board to participate electronically due to a conflict that prevented travel to the Richmond office for the meeting.

Staff Present

Arne W. Owens, Agency Director

Kelli G. Moss, Executive Director

Heather Pote, Acting Deputy Executive Director

Erin Barrett, Director of Legislative & Regulatory Affairs

Barbara Hodgdon, Ph.D., Deputy Director of HWDC

Laura A. Booberg, Assistant Attorney General, Board Counsel

Laura Jackson, Board Administrator

Laura Paasch, Senior Licensing & Operations Specialist

Public Present

Bo Keeney, Virginia Optometric Association

Mariah Merhige, Director of Marketing and Communications, The Keeney Group

Kimberly Small, Visual Research

Establishment of Quorum

With six members in attendance, including one member participating via electronic communication, a quorum was established.

Introductions

Dr. Neidigh spoke of Leslie Knachel's transition from her role as Executive Director of the Board of Optometry to Chief Operating Officer for the Department of Health Professions. He recognized her leadership and guidance as invaluable to the Board of Optometry and expressed appreciation for her service and dedication over the past fourteen years.

Dr. Neidigh congratulated Kelli Moss on her new position as the Executive Director of the Board starting June 10, 2024, after previously serving as the Board's Deputy Executive Director since 2018.

Ordering of Agenda

Dr. Neidigh opened the floor to any changes to the agenda. Ms. Moss asked the Board to amend the agenda to include a public comment period for this meeting, and the agenda was accepted with this amendment.

Public Hearing

The Board convened a public hearing to receive public comments on proposed Regulations of the Virginia Board of Optometry, documented separately in the public hearing meeting minutes.

Public Comment

There were no requests to provide public comment.

Approval of Minutes

Dr. Neidigh opened the floor to any additions or corrections regarding the draft minutes from the following meetings:

- July 14, 2023, Full Board Meeting
- November 3, 2023, Formal Hearing

Hearing no additions or corrections, the minutes were approved as presented.

Agency Director's Report

Mr. Owens provided an update on the agency's activities.

Legislative/Regulatory Report

Ms. Barrett provided information on the following:

- Regulatory update: Ms. Barrett reported the status of the proposed regulations for laser surgery, practitioner profiles required for laser surgery certified optometrists, and for agency subordinates to hear credentials cases.
- Adoption of exempt regulatory action pursuant to HB699 related to counseling and recordkeeping requirements for opioid prescribing.

Dr. Goldberg made a motion regarding the exempt regulatory change to amend Chapter 20 to add 18VAC105-20-51 as presented. The motion was seconded by Dr. Kaufman and carried unanimously.

- Addition of National Practitioner Data Bank (NPDB) report to licensure by endorsement process.

Dr. Roffis made a motion to adopt a Notice of Intended Regulatory Action (NOIRA) to add the NPDB report to requirements for licensure by endorsement. The motion was seconded by Dr. Goldberg and carried unanimously.

Discussion Items

2024 Optometry Healthcare Workforce Data Center Report

Dr. Barbara Hodgdon reported on the 2024 Optometry Healthcare Workforce Data Center report.

SRP Worksheet and Instructions

Ms. Kim Small provided information about the proposed revisions to the Board's Sanctioning Reference Points worksheet and instructions. Once adopted, these documents will be used to draft the SRP Manual for the board's consideration at a later meeting.

Dr. Kaufman made a motion to adopt the SRP worksheet and instructions as presented. The motion was seconded by Dr. Goldberg and carried unanimously.

Board Counsel Report

Ms. Booberg reported she has accepted a position at DHP as a Deputy Director of APD and new board counsel will be assigned to this board by the Office of the Attorney General.

President's Report

Dr. Neidigh stated he did not have anything to report.

ARBO Report

Dr. Neidigh reported that he, Dr. Kaufman and Ms. Moss attended the 2024 ARBO Annual Meeting held June 16-18 in Nashville, TN. He provided a recap of the information discussed the meeting.

Board of Health Professions' Report

Ms. Moss stated that due to lack of new appointments there have been no meetings scheduled for the Board of Health Professions thus far in 2024, because there are eight vacancies and no new appointments. She stated she will attempt to identify a date the remaining members can attend to hold a meeting by end of the calendar year as required.

Staff Reports

Ms. Moss presented Dr. Roffis and Dr. Goldberg each with a plaque to commemorate their eight years of service to the Board and the Commonwealth.

Ms. Moss provided information on board statistics, outreach efforts, staffing changes and the 2025 Board calendar. The 2025 ARBO Annual Meeting will be held in Minneapolis, MN.

Ms. Pote provided an update on open and closed discipline cases.

New Business

Elections

Dr. Kaufman made a motion to nominate Dr. Neidigh to continue to serve as the Board's President. The motion was seconded by Dr. Roffis. No other nominations were received. Voting by roll-call ballot was unanimous and the motion carried for Dr. Neidigh to serve another one-year term as President effective January 1, 2025 until December 31, 2025.

Dr. Roffis made a motion to nominate Dr. Kaufman to continue to serve as the Board's Vice-President. The motion was seconded by Dr. Goldberg. No other nominations were received. Voting by roll-call ballot was unanimous and the motion carried for Dr. Kaufman to serve another one-year term as Vice-President effective January 1, 2025 until December 31, 2025.

Next Meeting

The next full board meeting is scheduled for November 8, 2024.

Adjournment

Hearing no objections, Dr. Neidigh adjourned the meeting at 11:02 p.m.

Kelli G. Moss
Executive Director

Call to Order

The August 28, 2024, Virginia Board of Optometry public hearing on proposed regulatory amendments was called to order at 9:06 a.m. at the Department of Health Professions (DHP), Perimeter Center, 9960 Mayland Drive, 2nd Floor, Board Room 3, Henrico, Virginia 23233.

Presiding Officer

Gerald R. Neidigh, Jr., O.D., President

Members Present

Evan J. Kaufman, O.D., Vice President

Fred E. Goldberg, O.D.

Clifford A. Roffis, O.D.

Shawn H. Hobbs, O.D.

Member Attending Electronically

Corliss V. Booker, Ph.D., APRN, FNP-BC, Citizen Member, was approved by the President of the Board to participate electronically due to a family illness conflict that prevented travel to the Richmond office for the meeting.

Staff Present

Arne W. Owens, Agency Director

Kelli G. Moss, Executive Director

Heather Pote, Acting Deputy Executive Director

Erin Barrett, JD, Director of Legislative & Regulatory Affairs

Barbara Hodgdon, Ph.D., Deputy Director of HWDC

Laura A. Booberg, Assistant Attorney General, Board Counsel

Claire Foley, Adjudication Specialist

Matt Novak, Policy and Economic Analyst

Kelly Smith, Director of Communications

Laura Jackson, MSHSA, Board Administrator

Laura Paasch, Senior Licensing & Operations Specialist

Public Present

Bo Keeney, Virginia Optometric Association

Scott Mann, O.D., Virginia Optometric Association

Jeff Michaels, O.D., Virginia Optometric Association

John McAllister, M.D., Virginia Society of Eye Physicians and Surgeons

Michael Keverline, M.D., Virginia Society of Eye Physicians and Surgeons
Madeline Busse, Assistant Vice President, Two Capitols Consulting

Public Hearing - Proposed Regulations

Dr. Neidigh stated that the Board has adopted proposed regulatory amendments regarding laser surgery certifications.

The following public comment was provided:

- Dr. McAllister discussed laser surgery patient safety concerns in both didactic and live proctored cases and requested amendments to require both didactic courses and the performance of ten live, proctored cases for each of the laser surgical procedures.
- Mr. Keeney expressed support of the proposed regulations as drafted by the Regulatory/Legislative Committee with no modifications.
- Dr. Keverline discussed the differences between practicing on a model eye versus a human patient's eye and the importance of requiring proctored procedures on live patients prior to certification for laser surgery.
- Dr. Mann supports the proposed regulation as written.
- Dr. Michaels supports the proposed regulation as written.

Written comment on the proposed amendments to the Regulations of the Virginia Board of Optometry should be directed to Erin Barrett, Agency Regulatory Coordinator at erin.barrett@dhp.virginia.gov or comment may be posted on Virginia's Regulatory Town Hall at www.townhall.virginia.gov. The comment period will end at the close of business on October 25, 2024.

Public Hearing Adjournment

Hearing no objections, Dr. Neidigh adjourned the hearing at 9:17 a.m.

Kelli G. Moss
Executive Director

Board of Optometry
Current Regulatory Actions
As of October 21, 2024

In the Governor’s office

None.

In the Secretary’s office

VAC	Stage	Subject Matter	Submitted from agency	Time in current location	Notes
18VAC105-20	Proposed	Regulations for optometrist profiles and reporting	8/1/2023	244 days	Implements requirements from the 2022 Session.
18VAC105-20	NOIRA	Addition of NPDB report to licensure by endorsement process	9/3/2024	33 days	Adds submission of NPDB report for licensure by endorsement applications for safety of the public.

At the Department of Planning and Budget

None.

At the Office of the Attorney General

None.

Recently effective or awaiting publication

VAC	Stage	Subject Matter	Publication date	Effective date/ next steps
18VAC105-20	Proposed	Regulations for laser surgery certifications	8/26/2024	Final action before the Board.
18VAC105-20	Exempt	Changes to patient counseling and opioid prescribing pursuant to HB699 of the 2024 General Assembly	10/7/2024	Effective 11/6/2024

Agenda Item: Consideration of final regulatory action regarding laser surgery

Included in your agenda package:

- Draft final stage regulations identical to the proposed regulations;
- Four comments emailed to the Executive Director during the proposed stage publication;
- Minutes of the public hearing held on August 28, 2024; and
- Comments provided on Town Hall.

Staff note: 529 public comments were received via Town Hall. Of those, 511 were submitted within the last 36 hours of the 60-day public comment period. Four public comments were received via email, and five oral comments were received at the public hearing.

****Note that the following is a summary and does not substitute Board member review of comments nor direct discussion****

Of the Town Hall comments, 266 supported the proposed regulations as written. 41 requested different training requirements that include “both didactic and live proctored cases.” The comments were nearly identical and did not specify amendments beyond the statement that the commenters would like amendments to include didactic and live proctored cases. One comment requested a different number of proctored cases for each procedure. 45 comments disagreed with the training in general but did not provide alternatives. 5 comments stated residency should be required.

Many comments received on Town Hall were irrelevant or did not address the regulations. Those included 76 comments opposing the 2022 legislation, 88 comments supporting the 2022 legislation, 6 that contained no discernible position or did not address the regulations, even tangentially, and 2 comments received after the cut off period.

Action needed:

- Motion to adopt final regulations regarding laser surgery by optometrists as presented or as amended by the Board.

Project 7555 - Final

Board of Optometry

Regulations for laser surgery certifications

18VAC105-20-5. Definitions.

The following words and terms when used in this chapter shall have the following meanings unless the context clearly indicates otherwise:

"Acute pain" means pain that occurs within the normal course of a disease or condition for which controlled substances may be prescribed for no more than three months.

"Active clinical practice" means an average of 20 hours per week or 640 hours per year of providing patient care.

"Adnexa" is defined as the conjoined, subordinate, or immediately associated anatomic parts of the human eye, including eyelids and eyebrows.

"Board" means the Virginia Board of Optometry.

"Chronic pain" means nonmalignant pain that goes beyond the normal course of a disease or condition for which controlled substances may be prescribed for a period greater than three months.

"Controlled substance" means drugs listed in the Drug Control Act (§ 54.1-3400 et seq. of the Code of Virginia) in Schedules II through V.

"Laser surgery certification" means a certification issued by the board to a Virginia-licensed TPA-certified optometrist who has demonstrated compliance with the board's criteria for performance of peripheral iridotomy, selective laser trabeculoplasty, and YAG capsulotomy.

"LSPE" means the Laser and Surgical Procedures Examination administered by the NBEO.

"MME" means morphine milligram equivalent.

"NBEO" means the National Board of Examiners in Optometry.

"Prescription Monitoring Program" means the electronic system within the Department of Health Professions that monitors the dispensing of certain controlled substances.

"Proctored session" means any surgery on a live patient or procedure performed on a model eye that is observed and evaluated by a proctor for the purpose of obtaining laser surgery certification pursuant to 18VAC105-20-80 4 b.

"Proctoring" means an objective evaluation of an optometrist's clinical competence to perform laser surgery pursuant to § 54.1-3225 of the Code of Virginia.

"TMOD" means the treatment and management of ocular disease portion of the NBEO examination.

"TPA" means therapeutic pharmaceutical agents.

"TPA certification" means authorization by the Virginia Board of Optometry for an optometrist to treat diseases and abnormal conditions of the human eye and its adnexa and to prescribe and administer certain therapeutic pharmaceutical agents.

18VAC105-20-10. Requirements for licensure.

A. The applicant, in order to be eligible for licensure to practice optometry in the Commonwealth, shall meet the requirements for TPA certification in 18VAC105-20-16 and shall:

1. Be a graduate of a school of optometry accredited by the Accreditation Council on Optometric Education or other accrediting body deemed by the board to be substantially equivalent; and have an official transcript verifying graduation sent to the board;
2. Request submission of an official report from the NBEO of a score received on each required part of the NBEO examination or other board-approved examination;

3. Submit a completed application and the prescribed fee; and
4. Sign a statement attesting that the applicant has read, understands, and will comply with the statutes and regulations governing the practice of optometry in Virginia.

B. On or after January 1, 2033, all applicants to practice optometry in the Commonwealth shall meet the requirements for laser surgery in 18VAC105-20-80.

C. The board may waive the requirement of graduation from an accredited school of optometry for an applicant who holds a current, unrestricted license in another United States jurisdiction and has been engaged in active clinical practice for 36 out of the 60 months immediately preceding application for licensure in Virginia.

~~C.~~ D. Required examinations. For the purpose of § 54.1-3211 of the Code of Virginia, the board adopts all parts of the NBEO examination as its written examination for licensure. After July 1, 1997, the board shall require passage as determined by the board of Parts I, II, and III of the NBEO examination, including passage of TMOD.

~~D.~~ E. If an applicant has been licensed in another jurisdiction, the following requirements shall also apply:

1. The applicant shall attest that the applicant is not a respondent in a pending or unresolved malpractice claim.
2. Each jurisdiction in which the applicant is or has been licensed shall verify that:
 - a. The license is current and unrestricted, or if the license has lapsed, it is eligible for reinstatement;
 - b. All continuing education requirements have been completed, if applicable;
 - c. The applicant is not a respondent in any pending or unresolved board action; and

d. The applicant has not committed any act that would constitute a violation of § 54.1-3204 or 54.1-3215 of the Code of Virginia.

3. An applicant licensed in another jurisdiction who has not been engaged in active practice within the 12 months immediately preceding application for licensure in Virginia shall be required to complete 20 hours of continuing education as specified in 18VAC105-20-70.

4. In the case of a federal service optometrist, the commanding officer shall also verify that the applicant is in good standing.

18VAC105-20-20. Fees.

A. Required fees.

Initial application and licensure (including with <u>with</u> TPA certification)	\$250
<u>Initial application for licensure with TPA certification and laser surgery certification</u>	<u>\$350</u>
<u>Application for laser surgery certification</u>	<u>\$200</u>
Annual licensure renewal without TPA certification	\$150
Annual licensure renewal with TPA certification	\$200
<u>Annual licensure renewal with TPA certification and laser surgery certification</u>	<u>\$250</u>
Annual renewal of inactive license	\$100
Late renewal without TPA certification <u>of any license</u>	\$50
Late renewal with TPA certification	\$65
Late renewal of inactive license	\$35
Handling fee for returned check or dishonored credit card or debit card	\$50
Reinstatement application fee (including renewal and late fees)	\$400
Reinstatement application after disciplinary action	\$500

Duplicate wall certificate	\$25
Duplicate license	\$10
Licensure verification	\$10

B. Unless otherwise specified, all fees are nonrefundable.

C. From October 31, 2018, to December 31, 2018, the following fees shall be in effect:

Annual licensure renewal without TPA certification	\$75
Annual licensure renewal with TPA certification	\$100
Annual professional designation renewal (per location)	\$25

18VAC105-20-60. Renewal of licensure; reinstatement; renewal fees.

A. Every person authorized by the board to practice optometry shall, on or before ~~December 31 of 2018~~ March 31 of each year, submit a completed renewal form and pay the prescribed annual licensure fee. ~~Beginning with calendar year 2020, the renewal of licensure deadline shall be March 31 of each year. For calendar year 2019, no renewal is required.~~

B. It shall be the duty and responsibility of each licensee to ~~assure~~ ensure that the board has the licensee's current address of record and the public address, if different from the address of record. All changes of address or name shall be furnished to the board within 30 days after the change occurs. All notices required by law or by these rules and regulations are to be deemed to be validly tendered when mailed to the address of record given and shall not relieve the licensee of the obligation to comply.

C. The license of ~~every~~ any person who does not complete the renewal form and submit the renewal fee ~~each year~~ for a licensure period may be renewed for up to one year by paying the prescribed renewal fee and late fee, provided the requirements of 18VAC105-20-70 have been met. After the renewal deadline, a license that has not been renewed is lapsed. Practicing optometry in Virginia with a lapsed license may subject the licensee to disciplinary action.

D. An optometrist whose license has been lapsed for more than one year and who wishes to resume practice in Virginia shall apply for reinstatement. The executive director may grant reinstatement, provided that:

1. a. The applicant has a current, unrestricted license in another United States jurisdiction and has been engaged in active clinical practice within the 12 months immediately preceding application for reinstatement; or

~~2.~~ b. The applicant has satisfied current requirements for continuing education as specified in 18VAC105-20-70 for the period in which the license has been lapsed, not to exceed two years; and

~~3.~~ 2. The applicant has paid the prescribed reinstatement application fee.

18VAC105-20-80. Requirements for laser surgery certification.

An applicant for laser surgery certification shall submit to the board:

1. A completed application for laser surgery certification;

2. The prescribed fee;

3. An educational attestation from a dean or designee of a school of optometry or an instructor of a laser surgery certification course approved by the board that verifies that the applicant received didactic and clinical laser surgery training in the following subjects:

a. Laser physics, hazards, and safety;

b. Biophysics of laser;

c. Laser application in clinical optometry;

d. Laser tissue interactions;

e. Laser indications, contraindications, and potential complications;

- f. Gonioscopy;
- g. Laser therapy for open-angle glaucoma;
- h. Posterior capsulotomy;
- i. Common complications, lids, lashes, and lacrimal;
- j. Medicolegal aspects of anterior segment procedures;
- k. Peripheral iridotomy; and
- l. Laser trabeculoplasty.

The required attestation from the dean or designee of a school of optometry or an instructor of a laser surgery certification course approved by the board shall be submitted on a form prescribed by the board; and

4. Evidence of one of the following:

- a. Passage of the Laser Section of the LSPE, for which the applicant must request submission of an official report from the NBEO of the score received on the Laser Section of the LSPE; or
- b. Proctored sessions in compliance with 18VAC105-20-90, which may be obtained during education training described in subdivision 3 of this section.

18VAC105-20-90. Requirements for proctoring.

A. Applicants for laser surgery certification who have not provided the board with a passing score on the Laser Section of the LSPE must submit evidence on a form provided by the board of at least two proctored sessions for each of the following laser procedures:

- 1. Peripheral iridotomy;
- 2. Selective laser trabeculoplasty; and

3. YAG capsulotomy.

B. Proctors.

1. Pursuant to § 54.1-2400.01:1 of the Code of Virginia, a proctored session performed within the Commonwealth to qualify a TPA-certified optometrist for a laser surgery certification that consists of surgery on a live patient must be proctored by a licensed doctor of medicine or osteopathy who specializes in ophthalmology.

2. A proctored session performed within the Commonwealth to qualify a TPA-certified optometrist for a laser surgery certification that is performed on a model eye may be proctored by an individual holding a license in the Commonwealth or another jurisdiction who is authorized or certified to perform laser surgery on the eye and who does so as part of a regular course of practice.

3. The proctor must be in attendance in the room while the proctored session is performed, regardless of the jurisdiction in which the proctoring occurs.

4. Evidence of proctored sessions shall include a report by the proctor on a form provided by the board that:

a. Evaluates the clinical competency of the individual being proctored;

b. Describes the number and type of cases proctored; and

c. Includes the proctor's name, license type, license number, and state of licensure.

18VAC105-20-100. Reporting requirements.

A. An optometrist certified to perform laser surgery by the board shall report the following information to the board on a quarterly basis:

1. The number and type of laser surgeries performed by the optometrist;

2. The conditions treated for each laser surgery performed; and

3. Any adverse treatment outcomes associated with such procedures that required a referral to an ophthalmologist for treatment.

B. The requirements of subsection A shall expire on July 1, 2025.

18VAC105-20-110. Quality assurance review process.

A. Effective July 1, 2025, an optometrist certified to perform laser surgery by the board shall maintain documentation of the following for not less than three years:

1. The number and type of laser surgeries performed by the optometrist; and

2. Any adverse treatment outcomes associated with such procedures that required referral to an ophthalmologist for treatment.

B. The board may conduct a random audit of licensees requiring a subject licensee to provide documentation required in subsection A to the board within 30 days of notification of the audit.

From: [Moss, Kelli G. \(DHP\)](#)
To: [Barrett, Erin \(DHP\)](#)
Subject: Fw: Optometry laser training regulations
Date: Wednesday, October 30, 2024 1:19:18 PM

From: BABUR LATEEF <blateef@aol.com>
Sent: Friday, October 25, 2024 1:38 PM
To: Moss, Kelli G. (DHP) <kelli.moss@dhp.virginia.gov>
Subject: Optometry laser training regulations

10/25/24

Kelli Moss, Executive Director Virginia Board of Optometry Virginia Department of Health Professions 9960 Mayland Drive, Suite 300 Henrico, VA 23233 Kelli.Moss@dhp.virginia.gov

Dear Ms. Moss:

I hope you are well. I have been an ophthalmologist for over 25 years. I have served on the faculty at George Washington University School of Medicine's faculty training the next generation ophthalmologists. I take our work very seriously. Good training is critical for the safety of all of our patients.

I have served as Chairman of the Prince William County School Board for nearly 7 years, the Chairman of the UVA Health System Board for 2 years, and on the Board of Visitors for UVA for 8 years

I take education, training, and workforce readiness very seriously. I believe as government officials and as those charged with the safety and welfare of our citizens you have a sacred charge and duty to protect our communities.

I write also as a member of the Virginia Society of Eye Physicians and Surgeons, and as a citizen of this Commonwealth who cares about the safe delivery of health care to our communities.

It is for this reason I write with concerns about the credentialing of optometrists performing laser eye procedures.

I wish to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, **and in some cases proctoring is not even required!**

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Last, in line with Governor Youngkin's "right help, right now" efforts in education and healthcare, it should be incumbent on the board to provide the right help, right now regarding the proper training of optometrists to do a procedure that they never had any formal schooling in.

Failure to do so can be dangerous to the safe delivery of healthcare in the Commonwealth.

Sincerely,

Babur Lateef, MD

703-786-7796

13001 Chaddsford Ter

Manassas, VA 20112

October 24, 2024

Kelli Moss, Executive Director
Virginia Board of Optometry
Virginia Department of Health Professions
9960 Mayland Drive, Suite 300
Henrico, VA 23233
Kelli.Moss@dhp.virginia.gov

Dear Ms. Moss:

The Virginia Society of Eye Physicians and Surgeons (VSEPS) is the largest organization of eye physicians and surgeons in the Commonwealth. As a society, we protect sight and empower lives through ophthalmic education and advocating for our patients as well as the public. We strive to ensure the delivery of the highest-quality eye care in the Commonwealth.

We believe surgery should be done by surgeons. The Commonwealth has unfortunately decided to part from this seemingly self-evident principle. It is the duty of the Commonwealth to ensure the safety of its citizens. We therefore submit these comments regarding the proposed Board of Optometry regulations.

As the Board of Optometry finalizes the regulations for laser surgery certification, the VSEPS expresses great concern with the regulations as stated and we strongly recommend amending the current draft to reflect more stringent requirements around proctored sessions to ensure critical patient safety. We appreciate the Board's work to focus on the provisions for proctored care, the requirement of logging complications, and the requirement that didactic education include indications and complications. However, we would like to raise our concern with the section of the draft regulations that state an individual can meet the certification requirements by attending a didactic course or by performing these procedures in a proctored session on either a model eye or on a live patient. We strongly recommend amending the proposed regulations to require both didactic and live proctored cases, whether or not on a plastic model eye.

Understanding the theory of laser therapy and the internal structure and shape of the eye, is not the same as performing the same surgery on living tissue. Patients come to the laser treatment with a myriad of physiologic conditions that can impact these surgeries. Eye movements, tremors, neurologic conditions, anxiety, and even at times breathing (especially in obese patients) can move the eye centimeters, when laser eye surgery treatment is in a sphere of microns. Errors on this scale due to simple patient movement can change the outcome for these patients and increase their risk of complications. Carefully proctored practice mitigates and substantially lowers that risk to a much more tolerable level.

If you look across various industries that involve safety risk, it is typical to require supervised live practice in addition to standard didactics. Pilots must have substantial amounts of proctored hours flying a plane prior to being able to do so alone or with customers, all after taking didactics and a test. The Commonwealth requires a minimum of forty-five proctored hours of driving a car prior to getting a driver's license, again after didactics and tests. These standards ensure the safety of the public. We strongly believe it is in the best interest of patient safety to require proctored cases in live patients after didactics and testing prior to the Board approving an optometrist to operate one of these procedures.

Ophthalmologists are required to have extensive didactics as well as more than two hundred live proctored cases performed in their training prior to obtaining a medical license to practice. While we understand this number would be impractical to request, we believe it is reasonable to request ten live proctored capsulotomies, ten live proctored laser trabeculoplasties, and eight live proctored iridotomies for the safety of patients in the Commonwealth.

VSEPS created the recommendations above with patient safety at the forefront of each objective, and while we understand the desire to decrease patient wait times and streamline business operations, we believe patient safety takes primacy over business concerns and convenience and it is our strong hope that the Board of Optometry will include these suggestions to strengthen patient safety in their draft regulations.

In response to allegations of endorsement, the Virginia Society of Eye Physicians and Surgeons (the largest organization of ophthalmologists in the Commonwealth), the Northern Virginia Academy of Ophthalmology (the second largest organization of ophthalmologists in the Commonwealth), and the American Academy of Ophthalmology (the largest organization of ophthalmologists in the nation) as organizations have not supported, endorsed or collaborated with organized optometry or with the Board of Optometry in the process of their developing these regulations, which as they stand represent a dangerous decrease in the standard of care of the citizens of the Commonwealth.

Additionally, it is important to highlight that there has been very little opportunity for the overwhelming opinion of ophthalmologists to be considered in the development of these regulations. That includes a single in-person comment opportunity that was opened within 48 hours of publication of the proposed regulations. It also includes the presence of only one single ophthalmologist (whose placement we were not requested to assist with) on the Regulatory Advisory Panel that was responsible for reviewing various sections of the draft regulations. That Panel was otherwise comprised of four optometrists (to include a representative from the Virginia Optometric Association) and one citizen member. The representation on this panel was heavily geared toward the optometric profession, leaving room for minimal input from ophthalmologists, specifically regarding the required training and proctoring needed to maintain the highest level of patient safety.

The Board of Optometry's mission statement speaks of assuring patient safety. The VSEPS encourages the Board to hearken back to its mission statement, tighten standards of approval to require in-person proctoring in all cases, and place patient safety ahead of convenience or practice business concerns.

Thank you.

A handwritten signature in black ink, appearing to read "John T. McAllister". The signature is fluid and cursive, with a long horizontal stroke at the end.

John T. McAllister, MD
President

From: [Moss, Kelli G. \(DHP\)](#)
To: [Barrett, Erin \(DHP\)](#)
Subject: Fw: ODs performing laser procedures
Date: Wednesday, October 30, 2024 1:28:21 PM

From: E Sollenb <esollenb@gmail.com>
Sent: Thursday, October 24, 2024 6:01 PM
To: Moss, Kelli G. (DHP) <Kelli.Moss@dhp.virginia.gov>
Subject: ODs performing laser procedures

Hi Ms. Moss,

I'm an MD who is an OD friendly fellowship trained cornea specialist just down the road in East Tennessee.

While it is my opinion that ODs will need to have an expanded scope of practice to accommodate the bolus of boomers moving through our population, it is also my opinion that the scope expansion should be done in a rational fashion that gives the ODs proper instruction and training as is required in any medical training setting (ie med school, residency, fellowship, etc).

These lasers, while mostly benign the majority of the time when used properly, can cause severe and permanent visual debilitation if used improperly. Learning curve for a YAG laser is not long but for something like LASIK, it can take years if not decades to master. YAG laser access is an access to care issue while, excimer lasers are certainly not - excimer lasers provide elective refractive surgical options, while YAG lasers can restore functional vision that cannot be corrected with glasses or contact lenses.

I had to learn the indications and techniques for proper and safe use the YAG laser in residency and our OD colleagues should be required to do essentially the same to meet standard of care and ensure continued public trust.

I am not against expanding scope of care of YAG lasers but it must be done with didactics, testing, and proctored procedures on both models AND live patients. Any surgeon will tell you that live patients don't behave like the models and one must become facile with the real thing. ODs should only be proctored by medical doctors for this certification/credentialing.

This is not to limit access to ODs, it is to ensure public safety AND is of significant benefit to the ODs. When they become credentialed, they have a competitive advantage over their non-credentialed counterparts by having the public trust as an advanced provider.

Again, I am OD friendly - they are colleagues, not competitors, and we must work together to adequately care for the aging population - but this must be done properly. These lasers can easily cause harm if fired a single millimeter off target and while generally safe, the risks must not be taken lightly. Amendments must be in place to require proctoring by an MD on live patients. As someone who had to learn how to do lasers and surgery, I know how important it is to encounter LIVE patients.

Thank you,

Eric Sollenberger

From: [Moss, Kelli G. \(DHP\)](#)
To: [Barrett, Erin \(DHP\)](#)
Subject: Fw: Laser eye surgery draft regulations
Date: Wednesday, October 30, 2024 1:30:00 PM

From: Dan Drysdale <dbdry@gmail.com>
Sent: Thursday, October 24, 2024 6:47 PM
To: Moss, Kelli G. (DHP) <Kelli.Moss@dhp.virginia.gov>
Subject: Laser eye surgery draft regulations

Kelli Moss, Executive Director
Virginia Board of Optometry
Virginia Department of Health Professions
9960 Mayland Drive, Suite 300
Henrico, VA 23233

October 24, 2024

Dear Ms. Moss:

As a member of the Virginia Society of Eye Physicians and Surgeons, I am writing to express my deep concern regarding the current draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I feel strongly that the draft regulations should provide greater patient protection by including a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved.

Currently, the draft regulations are written so that proctoring can be done on a model eye, or on a live patient, and in some cases proctoring is not even required.

There are many physical issues that can affect an individual's ability to remain still during a laser eye surgery procedure. A few of these are tremors, anxiety, and breathing movements - particularly in obese patients. The slightest movement of a patient's eye, even a millimeter, can result in serious injury to the patient, because laser eye surgery treatment is measured in the range of microns.

I am submitting this request because patient safety is the top priority, and because patients deserve the safest possible care throughout the Commonwealth.

I hope you will consider this change to the draft regulations to assure that optometrists across the state are trained with patient safety in mind.

Sincerely,

Daniel B. Drysdale, MD
Blacksburg, Virginia

Call to Order

The August 28, 2024, Virginia Board of Optometry public hearing on proposed regulatory amendments was called to order at 9:06 a.m. at the Department of Health Professions (DHP), Perimeter Center, 9960 Mayland Drive, 2nd Floor, Board Room 3, Henrico, Virginia 23233.

Presiding Officer

Gerald R. Neidigh, Jr., O.D., President

Members Present

Evan J. Kaufman, O.D., Vice President
Fred E. Goldberg, O.D.
Clifford A. Roffis, O.D.
Shawn H. Hobbs, O.D.

Member Attending Electronically

Corliss V. Booker, Ph.D., APRN, FNP-BC, Citizen Member, was approved by the President of the Board to participate electronically due to a family illness conflict that prevented travel to the Richmond office for the meeting.

Staff Present

Arne W. Owens, Agency Director
Kelli G. Moss, Executive Director
Heather Pote, Acting Deputy Executive Director
Erin Barrett, JD, Director of Legislative & Regulatory Affairs
Barbara Hodgdon, Ph.D., Deputy Director of HWDC
Laura A. Booberg, Assistant Attorney General, Board Counsel
Claire Foley, Adjudication Specialist
Matt Novak, Policy and Economic Analyst
Kelly Smith, Director of Communications
Laura Jackson, MSHSA, Board Administrator
Laura Paasch, Senior Licensing & Operations Specialist

Public Present

Bo Keeney, Virginia Optometric Association
Scott Mann, O.D., Virginia Optometric Association
Jeff Michaels, O.D., Virginia Optometric Association
John McAllister, M.D., Virginia Society of Eye Physicians and Surgeons

Michael Keverline, M.D., Virginia Society of Eye Physicians and Surgeons
Madeline Busse, Assistant Vice President, Two Capitols Consulting

Public Hearing - Proposed Regulations

Dr. Neidigh stated that the Board has adopted proposed regulatory amendments regarding laser surgery certifications.

The following public comment was provided:

- Dr. McAllister discussed laser surgery patient safety concerns in both didactic and live proctored cases and requested amendments to require both didactic courses and the performance of ten live, proctored cases for each of the laser surgical procedures.
- Mr. Keeney expressed support of the proposed regulations as drafted by the Regulatory/Legislative Committee with no modifications.
- Dr. Keverline discussed the differences between practicing on a model eye versus a human patient's eye and the importance of requiring proctored procedures on live patients prior to certification for laser surgery.
- Dr. Mann supports the proposed regulation as written.
- Dr. Michaels supports the proposed regulation as written.

Written comment on the proposed amendments to the Regulations of the Virginia Board of Optometry should be directed to Erin Barrett, Agency Regulatory Coordinator at erin.barrett@dhp.virginia.gov or comment may be posted on Virginia's Regulatory Town Hall at www.townhall.virginia.gov. The comment period will end at the close of business on October 25, 2024.

Public Hearing Adjournment

Hearing no objections, Dr. Neidigh adjourned the hearing at 9:17 a.m.

Kelli G. Moss
Executive Director

Action: Regulations for laser surgery certifications [6072 / 10028]

Commenter	Title	Comment	Date/ID
Dr. Jeffrey Michaels	Support Laser Regulations as Presented Without Changes	Support the draft regulations as presented without changes. Optometrists have been performing these procedures since the 1990s.	9/20/24 2:44 pm CommentID:227872
Jacqueline Theis	Support for Laser Regulations	I support the draft regulations as presented without changes. I am an optometrist practicing in the state of Virginia, and attest that optometrists are properly and highly trained to perform these laser procedures. These regulations were developed with input from a regulatory advisory panel and included input from both optometry and ophthalmology.	9/20/24 2:46 pm CommentID:227873
Michael Polo	Support for Laser regulations	I am a OD practicing in Colonial Heights, Virginia. I fully support these draft regulations as they are presented.	9/20/24 2:47 pm CommentID:227874
Lisa V. Gontarek, OD	Support in office lasers by doctors of optometry as presented	<p>Please support the draft regulations that were developed from a regulatory advisory panel that included input from both optometrists and ophthalmologists. No changes.</p> <p>More than 146,000 of these laser procedures have been performed by optometrists across the country and Virginia optometrists are trained to perform these procedures as well.</p>	9/20/24 2:50 pm CommentID:227875
Dr Scott Mann - Invision	Support for laser regulations as written	This legislation will prevent our patients from duplicate visits with duplicate co-pays and out of pocket expenses. It will reduce waiting times from 3 months down to 3 days and decrease travel burdens and costs for our rural patients.	9/20/24 2:52 pm CommentID:227876
Anthony Zarella, OD, Horizon Family Eye Care, PLLC	Support draft regulations as presented	<p>I support the draft regulations as presented without change!</p> <p>Optometrist's are trained and qualified to perform these procedures, and the draft regulations have been prepared with input from a regulatory advisory panel that includes both Optometry and Ophthalmology experts in the field. Our patients are fully protected and will benefit from increased access to these procedures using the current language.</p> <p>Thank you!</p>	9/20/24 2:53 pm CommentID:227877
Mandy Pennington	Support laser regulations	I support the draft laser regulations as presented with no changes. I support the quality assurance review process as stated. I have been practicing for almost 20 years and optometrists are properly and highly trained to perform these laser procedures.	9/20/24 2:54 pm CommentID:227878
David Rose	Support for Laser Regulations	I am voicing my support for the draft regulations as presented with no changes. I also support no more than 2 proctored sessions for each of the laser procedures. Optometrists are properly and highly trained to perform these procedures.	9/20/24 2:54 pm CommentID:227879 P028

Katherine Rachon, OD, FAAO, Dipl ABO, Virginia Optometric Association	Support for proposal as submitted	Twelve states include in-office laser procedures done by optometrists, including a state in which I practiced and safely performed these procedures before moving to Virginia. More than 146,000 procedures have been performed by optometry with no unseen outcomes as shown by Nighthizer N, et al. ND: YAG Laser Capsulotomy: Efficacy and Outcomes performed by Optometrists. <i>Optom Vis Sci</i> 2023 100(10) 665-669. As is currently stands, draft regulations were developed with input from a regulatory advisory panel (RAP) that included input from both Optometrists and Ophthalmologists. I support the draft regulations AS presented without further changes and support the quality assurance review process as presented.	9/20/24 2:54 pm CommentID:227880
Christine Paschal, OD	Support Draft Regulations as Presented	I support the draft regulations as presented with no changes. I am an optometrist who has been practicing in Virginia for 7 years and am certified to perform YAG, SLT, and ALT procedures. I support that an educational attestation from a dean or designee of a school of optometry or instructor or a laser certification course approved by the board be sufficient evidence of appropriate training. We are highly trained doctors who can perform these procedures, and already treat patients who have had these procedures done. Also, optometrists themselves have been performing lasers in other states since the 1990s, more than 146,000 procedures in total.	9/20/24 2:55 pm CommentID:227881
Dr. Joseph Droter OD	Support for the proposal as submitted	There are 12 states that already include in-office laser procedures by optometrists. There have been over 146,000 procedures performed by optometrists across the country. Optometrists have been performing lasers since the 1990's.	9/20/24 2:56 pm CommentID:227882
Lisa Wallace-Davis, OD	Support for Laser Regulations	I am writing in support of the current laser bill as it is written. It is important to move this legislation forward with no changes. The legislation was developed with input from a regulatory advisory panel which included both optometrists and an ophthalmologist.	9/20/24 2:59 pm CommentID:227883
Kristy Robinson-Lee OD	Support in-office lasers by Optometrists	I am writing to support the draft regulations for laser surgery certifications as written. In Virginia, optometrists have been treating the conditions in these regulations since the early 1980s. Optometrists are highly and properly trained to treat these conditions. There are 12 states that include in-office laser procedures. Optometry scope has evolved in Virginia since the 1980s and the regulations should be approved. Again, I support the draft regulations as written.	9/20/24 3:00 pm CommentID:227884
Bo Keeney, Virginia Optometric Association	Support Draft Regulations as presented	The Virginia Optometric Association (VOA) thanks the Regulatory Advisory Panel (RAP) for drafting the proposed regulations and the members of the Board of Optometry for their continued work. We believe these draft regulations present a consensus amongst all stakeholders, including the Optometrists and Ophthalmologists who both served on the RAP. As	9/25/24 10:34 am CommentID:227904 P029

		<p>proven, we know that Virginia's Optometrists are properly and highly trained to perform these laser procedures. The draft regulations provide the appropriate measures needed to regulate Virginia licensed Optometrist who wish to perform these Ophthalmic laser procedures while protecting the interest of the public. We believe the draft regulations related to initial certification are more than adequate to qualify a provider. We support the educational attestation from a dean or designee of a school of optometry or an instructor of a laser surgery certification course approved by the board to be sufficient evidence of obtaining the appropriate didactic and clinical laser surgery training. We support the quality assurance review process as presented. We support the language that "Proctored session" means any surgery on a live patient or procedure performed on a model eye. We support no more than two proctored sessions for each of the laser procedures. In the end, we thank for board for their work and encourage you to proceed with the draft regulations exactly as presented with no modifications or changes.</p>	
Adam Parker	Support optometry regs	<p>Please support the optometric laser regulations as currently presented. They were developed collaboratively with input from both optometrists and ophthalmologists. Optometrists are thoroughly educated, trained, and certified to perform these procedures. Additionally, in-office laser procedures by optometrists are already permitted in 12 states, with over 146,000 procedures performed nationwide. Supporting the regulations as written will ensure consistent and safe practice standards.</p> <p>Thank you for your consideration.</p> <p>Regards, Adam Parker, OD</p>	9/25/24 12:37 pm CommentID:227907
Walter Whitley	Support in-office lasers by doctors of optometry	<p>I am writing in support of the draft regulations as presented without any changes. This draft was developed with input from optometry and ophthalmology and should be supported as presented.</p>	9/25/24 5:28 pm CommentID:227934
Jenny Alsop, OD	Support optometry proposal as submitted	<p>Please support regulations as presented, they were developed with input from optometry and ophthalmology and should be supported as presented for the well being of the public.</p> <p>Optometrists are educated, trained and certified to perform the procedures outlined in the regulations within their doctoral programs.</p> <p>Twelve (12) states include in-office laser procedures by optometrists, dating back to the 1990s.</p>	9/30/24 3:56 pm CommentID:228028
david mcclure	lasers	<p>laser surgery needs to be performed by people who are</p>	10/18/24 11:19 am P030

trained in the proper use of and complications for proper patient care; please take care of patient best interests; thank you

CommentID:228138

Mary Beth McAteer

Concerned regarding regulations

Kelli Moss, Executive Director
Virginia Board of Optometry
Virginia Department of Health Professions 9960
Mayland Drive, Suite 300
Henrico, VA 23233 Kelli.Moss@dhp.virginia.gov

10/24/24 7:36 am
CommentID:228216

Dear Ms. Moss:

As a member of the Northern Virginia Academy of Ophthalmology, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in many cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Sincerely,

P031

		Mary Beth McAteer	
Jason Goldberg MD	laser surgery certification	<p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved.</p> <p>Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient. There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.</p> <p>Respectfully,</p> <p>Jason Goldberg MD</p>	10/24/24 11:30 am CommentID:228220
Mark Mannis	LAsEr Surgery by Optometrists	<p>Dear Madams, Sirs:</p> <p>The proposal to allow optometric practitioners to perform laser surgery on the eye represents a clear and present danger to the patient population of Virginia. Laser surgery is performed inside the eye , and without adequate surgical training and the experience to know how to deal with surgical complications, optometrists should not be performing these procedures. Proposals such as this demonstrate a misunderstanding of how competent surgeons learn their craft. It is not feasible to assume that practice on a plastic model without proctored instruction is in any way adequate to prepare a non-surgically trained optometrist to undertake this kind of intra-ocular surgery. We would ask every legislator to consider whether he or she would submit to surgery by a practitioner without solid surgical training. I certainly would not. There are adequate resources in Virginia's ophthalmologic community to provide these procedures, so it is not a problem of</p>	10/24/24 12:18 pm CommentID:228221

access.

We urge the legislature to defeat this proposal in the interest of the safety of Virginia's citizens.

Mark J Mannis, MD, FACS

California Academy of Eye Physicians and Surgeons

Daniel Montenegro MD

Laser Surgery by Optometrists

Dear Madams, Sirs:

The proposal to allow optometric practitioners to perform laser surgery on the eye represents a serious and dangerous risk for the population of Virginia. As Ophthalmologists, we perform over 200 laser procedures with direct supervision on live patients before being allowed to perform these on our own. The risks of laser procedures include bleeding inside the eye, high pressure inside the eye, retinal detachment, and many more. If one of these complications were to occur, we as Ophthalmologists are prepared to handle these complications for our patients. Our medical school education and rigorous Ophthalmology Residency training is what prepares us to perform surgery around and inside the eye. I agree with Dr. Mannis in that it is not feasible to assume that practice on a plastic model without proctored instruction is in any way adequate to prepare a non-surgically trained optometrist to undertake this kind of intra-ocular surgery. We urge the legislature to not approve this proposal in order to protect the health of the citizens of Virginia. Thank you for your time and consideration.

Sincerely,

Daniel Montenegro, MD

Miami, FL

10/24/24 12:34 pm
CommentID:228222

Anonymous

LASER eye Surgery by Optometrists

Dear Madams, Sirs:

The proposal to allow optometric practitioners to perform laser eye surgery is flat out dangerous.

The proposal to allow optometric practitioners to perform laser surgery on the eye represents a clear and present danger to the patient population of Virginia. Laser surgery is performed inside the eye , and without adequate surgical training and the experience to know how to deal with surgical complications, optometrists should not be performing these procedures. Proposals

10/24/24 12:41 pm
CommentID:228224

such as this demonstrate a misunderstanding of how competent surgeons learn their craft. It is not feasible to assume that practice on a plastic model without proctored instruction is in any way adequate to prepare a non-surgically trained optometrist to undertake this kind of intra-ocular surgery. We would ask every legislator to consider whether he or she would submit to surgery by a practitioner without solid surgical training. I certainly would not. There are adequate resources in Virginia's ophthalmologic community to provide these procedures, so it is not a problem of access.

We urge the legislature to defeat this proposal in the interest of the safety of Virginia's citizens.

Sherief Raouf MD

New York Ophthalmic Society

Anonymous

Opposition to optima performing laser

I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you

10/24/24 12:45 pm
CommentID:228225

will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Kenneth mathys MD

Michael R
Keeverline, MD

Need for
proctoring on live
patients

As I presented personally at the public comment meeting, I believe that proctored procedures done on live patients are an essential safety measure and should be included in this legislation.

Approximately 80% of difficulties in performance of the included procedures are due to patient movement, body habitus and active resistance. You can not replicate these things with an eye model or computer program.

For the safety of Patients in the Commonwealth, proctored procedures on live patients must be a part of the regulations.

Michael Keeverline, MD

Chesapeake, VA

10/24/24 1:06 pm
CommentID:228226

John T
McAllister,
M.D.

Highly
Concerning
Regulations

Kelli Moss, Executive Director

Virginia Board of Optometry

Virginia Department of Health Professions

9960 Mayland Drive, Suite 300

Henrico, VA 23233

Kelli.Moss@dhp.virginia.gov

Dear Ms. Moss:

The Virginia Society of Eye Physicians and Surgeons (VSEPS) is the largest organization of eye physicians and surgeons in the Commonwealth. As a society, we protect sight and empower lives through ophthalmic education and advocating for our patients as well as the public. We strive to ensure the delivery of the highest-quality eye care in the Commonwealth.

Surgery should be done by surgeons. The Commonwealth has unfortunately decided to part from this seemingly self-evident truth. It is the duty of the Commonwealth to ensure the safety of its citizens. We therefore submit these comments regarding the

10/24/24 1:24 pm
CommentID:228228

proposed Board of Optometry regulations.

As the Board of Optometry finalizes the regulations for laser surgery certification, the VSEPS expresses great concern with the regulations as stated and we strongly recommend amending the current draft to reflect more stringent requirements around proctored sessions to ensure critical patient safety. We appreciate the Board's work to focus on the provisions for proctored care, the requirement of logging complications, and the requirement that didactic education include indications and complications. However, we would like to raise our concern with the section of the draft regulations that state an individual can meet the certification requirements by attending a didactic course or by performing these procedures in a proctored session on either a model eye or on a live patient. We strongly recommend amending the proposed regulations to require both didactic and live proctored cases, whether or not on a plastic model eye.

Understanding the theory of laser therapy and the internal structure and shape of the eye, is not the same as performing the same surgery on living tissue. Patients come to the laser treatment with a myriad of physiologic conditions that can impact these surgeries. Eye movements, tremors, neurologic conditions, anxiety, and even at times breathing (especially in obese patients) can move the eye centimeters, when laser eye surgery treatment is in a sphere of microns. Errors on this scale due to simple patient movement can change the outcome for these patients and increase their risk of complications. Carefully proctored practice mitigates and substantially lowers that risk to a much more tolerable level.

If you look across various industries that involve safety risk, it is typical to require supervised live practice in addition to standard didactics. Pilots must have substantial amounts of proctored hours flying a plane prior to being able to do so alone or with customers, all after taking didactics and a test. The Commonwealth requires a minimum of 45 proctored hours of driving a car prior to getting a driver's license, again after didactics and tests. These standards ensure the safety of the public. We strongly believe it is in the best interest of patient safety to require proctored cases in live patients after didactics and testing prior to the Board approving an optometrist to operate one of these procedures.

Ophthalmologists are required to have extensive didactics as well as more than two hundred live proctored cases performed in their training prior to obtaining a medical license to practice. While we understand this number would be impractical to request, we believe it is reasonable to request ten live proctored capsulotomies, ten live proctored laser trabeculoplasties, and eight live proctored iridotomies for the safety of patients in the Commonwealth.

VSEPS created the recommendations above with patient safety at the forefront of each objective, and while we understand the desire to decrease patient wait times and streamline business operations, we believe patient safety takes primacy over business concerns and convenience and it is our strong hope that the Board of Optometry will include these suggestions to strengthen patient safety in their draft regulations.

In response to allegations of endorsement, the Virginia Society of Eye Physicians and Surgeons (the largest organization of ophthalmologists in the Commonwealth), the Northern Virginia Academy of Ophthalmology (the second largest organization of ophthalmologists in the Commonwealth), and the American Academy of Ophthalmology (the largest organization of ophthalmologists in the nation) as organizations have not supported, endorsed or collaborated with organized optometry or with the Board of Optometry in the process of their developing these regulations, which as they stand represent a dangerous decrease in the standard of care of the citizens of the Commonwealth.

Additionally, it is important to highlight that there has been very little opportunity for the overwhelming opinion of ophthalmologists to be considered in the development of these regulations. That includes a single in-person comment opportunity that was opened within 48 hours of publication of the proposed regulations. It also includes the presence of only one single ophthalmologist (whose placement we were not requested to assist with) on the Regulatory Advisory Panel that was responsible for reviewing various sections of the draft regulations. That Panel was otherwise comprised of four optometrists (to include a representative from the Virginia Optometric Association) and one citizen member. The

representation on this panel was heavily geared toward the optometric profession, leaving room for minimal input from ophthalmologists, specifically regarding the required training and proctoring needed to maintain the highest level of patient safety.

The Board of Optometry's mission statement speaks of assuring patient safety. The VSEPS encourages the Board to hearken back to its mission statement, protect the citizens of the Commonwealth, and tighten standards of approval to require in-person proctoring in *all* cases, and place patient safety ahead of convenience or practice business concerns.

Thank you,



John T. McAllister, MD

President, Virginia Society of Eye Physicians and Surgeons

Andrew Siegel,
MD - Eye
Physicians of
Virginia

Amendment to
Proposed
Regulations to
Preserve Patient
Safety

October 24th, 2024

Kelli Moss, Executive Director
Virginia Board of Optometry
Virginia Department of Health Professions 9960
Mayland Drive, Suite 300
Henrico, VA 23233 Kelli.Moss@dhp.virginia.gov

Dear Ms. Moss:

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored

10/24/24 1:30 pm
CommentID:228229

cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Please know that in ophthalmology residency, we have hundreds (sometimes thousands) of directly supervised laser procedures - giving patients anything less is a disservice to their health and autonomy.

Thank you for your consideration,

Andrew Siegel, MD

Makesha L Sink, OD, FAAO, ABCMO

I support this bill as written

I support the draft regulations as presented without changes. These regulations were written conjointly by a regulatory advisory board consisting of highly trained optometrists and ophthalmologists alike who agreed that laser procedures are safely performed by optometrists and ophthalmologists alike.

A recent study highlights that optometrists have been performing these procedures safely since 1988 in the United States, currently in 12 states, and also in the United Kingdom and New Zealand alike. With well over 150,000 of these procedures performed by optometrists as recorded in the US, there has been a complication rate of 0.001%. I am sure ophthalmologists on this comment board, who have raised opposition to this regulation change, can agree that these statistics on procedures performed on REAL patients by optometrists show that their skills and

10/24/24 2:20 pm
CommentID:228230

		<p>outcomes are inarguably safe and similar outcomes to what ophthalmologists perform.</p> <p>I have been practicing for over 20 years and optometrists are properly and highly trained to perform these laser procedures. I have included a link to the referenced study above and am happy to advise further. Study Confirms Safety of Optometric Laser Surgery (reviewofoptometry.com) Published 7/31/2024.</p> <p>Thank you</p>	
Brooke A. Smith, OD FAAO	Support for Laser Regulations	<p>I support the draft regulations as presented without changes and the quality assurance review process as stated. These regulations were developed with input from a regulatory advisory panel and included input from both optometry and ophthalmology for safe laser practice.</p> <p>I have been practicing for almost 18 years and optometrists are properly and highly trained to perform these laser procedures. These laser procedures have been performed by optometrists across the country and Virginia optometrists are trained to perform these procedures as well.</p> <p>An article was published this past July 2024 regarding the safety of optometric laser surgery (Lighthizer N, Patel K, Cockrell D, et al. Establishment and review of educational programs to train optometrists in laser procedures and injections. Clin Experiment Optom. July 24, 2024). This study represents the first published data from multiple decades and numerous states highlighting the competency and safety of ODs performing advanced procedures. “The outcomes of over 146,403 laser procedures performed by optometrists across the US have shown only two negative outcomes, equating to 0.001%,” the researchers reported.</p> <p>Again, I support the draft regulations for optometry laser as presented without changes.</p>	10/24/24 2:22 pm CommentID:228231
ERIN VOGT STROMBERG, Blink Eyecare	support of the draft regulations	I am also writing in support of the draft regulations as presented without any changes. This draft was developed with input from optometry and ophthalmology and should be supported as presented.	10/24/24 2:51 pm CommentID:228232
Anonymous	Support as written	I support the bill as written.	10/24/24 3:04 pm CommentID:228233
Richard E.	Support the draft	Virginia’s Optometrists are properly and highly trained	10/24/24 19 pm

Castillo, OD, DO	as written	<p>to perform these laser procedures. The draft regulations provide the appropriate measures needed to regulate Virginia licensed Optometrist who wish to perform these ophthalmic laser procedures while protecting the interest of the public.</p> <p>I support passage of the National Board of Examiners in Optometry's Laser and Surgical Procedures Examination as a certying mechanism, or a course approved by the Virginia optometric licensing board to be evidence of appropriate didactic and clinical laser surgery training.</p>	CommentID:228234
Chris Wroten	Support optometry regulations as presented	I write in support of the draft regulations as presented without any changes. In-office lasers have been safely and effectively performed by doctors of optometry since the 1990s.	10/24/24 3:35 pm CommentID:228235
Amanda Umlandt OD FAAO	Support optometry regulations as presented	I am in support of draft regulations as presented without any changes. Draft regulations as presented were developed with thoughtful input from optometry and ophthalmology and should be supported as presented. I do support the regulations including proctored sessions with model eyes. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. I have performed these procedures numerous times when licensed in another state but have been unable to perform them since living in Virginia. My education and training will provide significant value to my patients and lessen their burden of travel to receive these procedures, in most cases out of state as I live near the border in an low population area. Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure.	10/24/24 3:42 pm CommentID:228236
Sonya Shah, MD	Amendment to Proposed Regulations to Preserve Patient Safety	<p>It is the duty of the Commonwealth to ensure the safety of its citizens. I therefore submit these comments regarding the proposed Board of Optometry regulations.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I am concerned about the regulations as stated and recommend amending the current draft to reflect more stringent requirements around proctored sessions to ensure critical patient safety.</p> <p>While there are provisions for proctored care, the requirement of logging complications, and the requirement that didactic education include indications and complications. However, it seems an individual can meet the certification requirements by attending a didactic course or by performing these procedures in a proctored session on either a model eye or on a live patient. I strongly recommend amending the proposed</p>	10/24/24 4:00 pm CommentID:228238

regulations to require both didactic and live proctored cases.

Understanding the theory of laser therapy and the internal structure and shape of the eye, is not the same as performing the same surgery on living tissue. Patients come to the laser treatment with a myriad of physiologic conditions that can impact these surgeries. Eye movements, tremors, neurologic conditions, anxiety, and even at times breathing (especially in obese patients) can move the eye centimeters, when laser eye surgery treatment is in a sphere of microns. Bleeding and inflammation can obscure the view for accurate treatment. Errors on this scale can change the outcome for these patients and increase their risk of complications. Carefully proctored practice mitigates and substantially lowers that risk to a much more tolerable level.

If you look across various industries that involve safety risk, it is typical to require supervised live practice in addition to standard didactics. Pilots must have substantial amounts of proctored hours flying a plane prior to being able to do so alone or with customers, all after taking didactics and a test. The Commonwealth requires a minimum of 45 proctored hours of driving a car prior to getting a driver's license, again after didactics and tests. These standards ensure the safety of the public. We strongly believe it is in the best interest of patient safety to require proctored cases in live patients after didactics and testing prior to the Board approving an optometrist to operate one of these procedures.

Ophthalmologists are required to have extensive didactics as well as more than two hundred live proctored cases performed in their training prior to obtaining a medical license to practice. While we understand this number would be impractical to request, we believe it is reasonable to request ten live proctored capsulotomies, ten live proctored laser trabeculoplasties, and ten live proctored iridotomies for the safety of patients in the Commonwealth.

Would you allow your parent or child to have eye laser done by someone who has only ever worked on a plastic eye, and was proctored only once or twice?

It is my strong hope that the Board of Optometry will include these suggestions to strengthen patient safety in their draft regulations.

In response to allegations of endorsement, none of the following organizations have supported, endorsed or collaborated with the Board of Optometry in the process of their developing these regulations: the

Virginia Society of Eye Physicians and Surgeons (the largest organization of ophthalmologists in the Commonwealth), the Northern Virginia Academy of Ophthalmology (the second largest organization of ophthalmologists in the Commonwealth), or the American Academy of Ophthalmology (the largest national organization of ophthalmologists).

Additionally, it is important to highlight that there has been very little opportunity for the overwhelming opinion of ophthalmologists to be considered in the development of these regulations. That includes a single in-person comment opportunity that was opened within 48 hours of publication of the proposed regulations. It also includes the presence of only one single ophthalmologist (whose placement was not coordinated with the Virginia Society of Eye Physicians and Surgeons) on the Regulatory Advisory Panel that was responsible for reviewing various sections of the draft regulations. That panel was otherwise comprised of four optometrists and one citizen member. The representation on the panel was heavily geared toward the optometric profession, leaving room for minimal input from ophthalmologists, specifically regarding the required training and proctoring needed to maintain the highest level of patient safety.

The Board of Optometry's mission statement speaks of assuring patient safety. I encourage the Board to hearken back to its mission statement, protect the citizens of the Commonwealth, and tighten standards of approval to require in-person proctoring in *all* cases, and place patient safety ahead of convenience or practice business concerns.

Charles McGuffey MD

Amendment to Proposed Regulations to Preserve Patient Safety

Dear Ms. Moss:

As an ophthalmologist, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a

10/24/24 4:39 pm
CommentID:228239

laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients, positioning of the patient, etc. Furthermore, different implant materials respond differently to laser and merit different techniques. Multifocal implants, as an example, can very easily lose their refractive properties with YAG laser defects. Without proper live patient experience and proctoring in this area, providers will be learning on the job at the patient's expense. A plastic model in isolation cannot possibly be sufficient to teach any provider safe and effective laser technique.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Jon Pederson,
OD

Support draft regulations as presented without any changes

I support the draft regulations as written. These draft regulations were developed with good-faith input from ophthalmology and optometry. They align with other states that have seen optometrists safely perform over 146,000 procedures.

10/24/24 6:25 pm
CommentID:228241

A Concerned
Ophthalmologist
and Citizen

Patient Safety
First! Amendment
to Proposed
Regulations to
Preserve Patient
Safety

Kelli Moss, Executive Director Virginia Board of Optometry

Virginia Department of Health Professions

9960 Mayland Drive, Suite 300 Henrico, VA 23233

Kelli.Moss@dhp.virginia.gov

Dear Ms. Moss:

As a member of the Virginia Society of Eye Physicians and Surgeons and the Northern Virginia Academy of Ophthalmology, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these

10/24/24 8:00 pm
CommentID:228242

varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Sincerely,

Your local, caring ophthalmologist (and many more who write under a pseudonym for fear of retaliation).

Philip Chung,
MD

Amendment to
Proposed
Regulations to
Preserve Patient
Safety

Thursday, October 24th, 2024

Dear Ms. Moss:

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is quite a bit of difference between doing laser cases when there is a clear model eye and the variety of patient's presentations. There are many potential complications that a model eye or one or two proctored cases will not encompass. A doctor should perform at least 20 to 30 proctored cases to feel somewhat comfortable with a laser procedure. Also, the doctor should see a wide variety of cases. The requirements to be certified will not be sufficient for someone to feel comfortable going solo on a laser procedure on a live patient.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly

10/24/24 8:02 pm
CommentID:228243

for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Sincerely,

Philip Chung, MD

Mohsin Ali, MD
- Secretary,
Northern
Virginia
Academy of
Ophthalmology

Serious concerns
regarding laser
surgery
certification

As the Secretary of the Northern Virginia Academy of Ophthalmology and a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases. A plastic model is not enough. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required. This method of training is simply inadequate for anyone wishing to perform lasers and obviously threatens the safety of patients. As someone who is closely involved in the training of ophthalmology residents and vitreoretinal surgery fellows, I know the nuances of teaching procedural skills such as laser treatment to trainees. I would not allow my trainees to perform laser procedures unless they have been appropriately trained because I know the risks involved with laser treatment, especially by improperly trained individuals. I would not allow an optometrist with the minimum level of training included here to perform laser treatment on any of my patients or my family members because it is clearly inadequate. No patient should accept this and no regulatory body should find it acceptable to have such a low standard for patient safety.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you

10/24/24 8:02 pm
CommentID:228244

will consider change to the draft regulations to ensure optometrists across the state are trained to appropriately high standards.

Mohsin Ali, MD

Co-Director of Vitreoretinal Surgery Fellowship Program

Retina Group of Washington

Secretary, Northern Virginia Academy of Ophthalmology

Jason Huang

Optometry laser training

As a member of the Virginia Society of Eye Physicians and Surgeons, I am writing this letter to express my concern regarding a section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

No type of training can truly replicate a procedure in a live patient. Live patients often have difficulty remaining still during a laser eye surgery. Some patients may have tremors, anxiety, or labored breathing which causes movement of their eyes. The eye is a small organ, and the smallest movement of the patient's eye, even a fraction of a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Jason Huang

10/24/24 8:18 pm
CommentID:228245

Heather Gitchell, OD

Support Regulations as Presented

The certification requirements in the proposed regulations are more than adequate to ensure competency and public safety. It is important to remember that these procedures are not new to optometrists; they are being done safely and effectively by qualified optometrists across the country.

10/24/24 8:38 pm
CommentID:228246

P047

<p>Eric Lee, MD; The Retina Group of Washington</p>	<p>Amendment to Proposed Regulations to Preserve Patient Safety</p>	<p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.</p> <p>There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.</p>	<p>10/24/24 8:42 pm CommentID:228247</p>
<p>Anonymous</p>	<p>Amendment to Proposed Regulations to Preserve Patient Safety</p>	<p>Dear Ms. Moss:</p> <p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether</p>	<p>10/24/24 8:57 pm CommentID:228248</p> <p style="text-align: right;">P048</p>

or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Anonymous

Support optometry

I support the present optometry law as is for lasers

10/24/24 9:02 pm
CommentID:228249

Imran Khatri,
The Retina
Group of
Washington

Amendment to
Proposed
Regulations to
Preserve Patient
Safety

Dear Ms. Moss:

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the

10/24/24 9:02 pm
CommentID:228250

sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Respectfully,

Imran Khatri, MD

Sarah Kamal,
MD, Retina
Group of
Washington

Highly concerned
regarding laser
surgery
certification

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Sincerely,

Sarah Kamal, MD

10/24/24 9:07 pm
CommentID:228251

Sundeep Kasi,
Retina Group of
Washington

Amendment to
Proposed
Regulations to

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to express my deep concern for patient safety regarding the particular section in the

10/24/24 9:21 pm
CommentID:228252
P050

	Preserve Patient Safety	<p>draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.</p> <p>Many factors can lead to challenges in performing a laser surgery procedures. A patient may be unable to stay still enough due to medical conditions or even poor positioning by the laser operator. If the laser application is even a millimeter off target, permanent and irreversible damage may develop in the patient's eye. Live proctoring of cases is a MINIMUM to develop the skills required to safely perform these laser procedures - it is NOT automated by the machines.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.</p>	
Anonymous	Do not support	<p>I agree with the dissenting group opinion. The regulations as presented are insufficient to prioritize patient safety and visual outcomes. To achieve competence that a patient would expect of a provider managing a critical procedure with implications of saving (or damaging) sight, there should be only one standard of training and certification. It should reflect the more academically stringent, highly supervised, and true-to-life methods that MDs employ in training residents and fellows. Anything less is a disservice to our patients that trust us, and may not fully understand the differences in the training pipeline between MDs and ODs. Adopt a higher standard - the MD way.</p>	10/24/24 9:29 pm CommentID:228253
Practicing Ophthalmologist	Requirements for Laser Certification	<p>Patient safety is the highest priority in medical care. Patients have the right to be treated only by providers who have the appropriate training and experience. Our optometry colleagues seeking to perform laser procedures should be adequately assessed for competency, which I believe can only be demonstrated through treatment of real patients under supervision.</p> <p>I support amending the draft regulations to reflect a</p>	10/24/24 9:32 pm CommentID:228254 P051

proctoring process that requires both didactic and live proctored cases on real patients.

Ophthalmologist in Northern Virginia

Michael Osman
MD

laser regulations

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Michael Osman MD

10/24/24 9:35 pm
CommentID:228255

Anonymous

Laser procedures

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved.

10/24/24 10:09 pm
CommentID:228256

P052

Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a millimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Abdullah Abou-Samra, MD
Retina Group of Washington

Serious Concerns
Regarding Laser
Certification for
Optometry

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

10/24/24 10:39 pm
CommentID:228257

Sincerely,
Abdullah Abou-Samra, MD

Kapil Kapoor

Live proctoring

As a member of the **Virginia Society of Eye Physicians and Surgeons**, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth.

10/24/24 10:51 pm
CommentID:228259

Concerned Physician and Ex Professor

Skills must be earned, not legislated

Having done more than 20k intraocular laser procedures, I've learned the most important part of the procedure is to know when NOT to do it and the second most important part is recognizing unforeseen consequences in a timely manner and address them.

Without a proper surgical residency, it is extremely difficult to execute these two tasks. Thus our first year residents, second or even third years don't do these lasers alone in residency. If an OD is wanting to do these safely, there should be a 2-3 year mentoring system in place with local surgeons to help them address above issues.

I would not allow my 3rd year surgical resident to perform this unsupervised. Why then an OD without any surgical training.

please, for your patients' sake, train skills and not just legislate them into being.

10/24/24 10:55 pm
CommentID:228260

Fellowship trained ophthalmologist

Preserving quality of care

I am quite shocked at the notion that the same quality of care can arise from a non surgical practitioner who doesn't have a medical degree. There are layers of complexity to diagnostics that come with years of surgical training in order to avoid and manage potential complications. Optometrists are not held to the same standard of training or board certification and have

10/24/24 11:13 pm
CommentID:228261

		<p>very little background in managing systemic diseases. Choosing the wrong candidate for a procedure who may have a preexisting condition that is a contraindication is one of many concerning scenarios that I can list. We are supposed to be a country that provides unmatched medical care and should never make that compromise as part of our Hippocratic oath.</p>	
Nate Lighthizer, OD FAAO FAAOMS	Support Laser Regulations as Presented without Changes	<p>Optometrists have been safely performing laser procedures in certain states for numerous decades. Optometrists are experts in this field and are extremely well qualified to perform laser procedures. Studies show optometrists safely and effectively perform these laser procedures. Clinically hundreds of thousands of patients have benefitted from laser procedures performed by optometrists. Virginia citizens are going to be extremely well cared for by optometrists performing laser procedures. I support the laser regulations as presented without changes.</p>	10/24/24 11:32 pm CommentID:228262
Dr Allison Minarcik	view from a non-eye specialist	<p>As a Family Medicine physician who reviews medical records for military accessions, reviewing over 300 optometry and ophthalmology visits each month, I will say there is a significant delta in the # of patients an optometrist refers to ophthalmology for "retina tears needing laser" diagnosed by optometry, and the # of patients who end up actually having a retinal tear or another finding that warrants laser. Given this discrepancy, not only does there need to be a high level of standardized training to performing laser treatments, there should be much higher emphasis to ensure competency on accurately identifying findings that NEED laser treatment. In short, for an optometrist to perform laser, they should undergo proper academic, didactic, and clinical training to match the fund of knowledge as the ophthalmologists who diagnose and treat ocular pathology warranting laser. A disparity in this competence is deceptive to patients.</p>	10/24/24 11:43 pm CommentID:228263
Aziz Khanifar, MD - The Retina Group of Washington	Please protect patients' eyesight	<p>Ms. Moss:</p> <p>Out of concern for the health and the sight of citizens of Virginia, I am asking you to recognize that the proposed regulation as written is dangerous.</p> <p>Laser surgery, even though it is performed with a laser and a not a scalpel, is still SURGERY. Surgery should only be performed by practitioners who have been properly trained. Proper training consists of both didactics and also live, proctored training involving a real patient.</p> <p>We would never be OK allowing a loved one to have a procedure performed by someone who had only</p>	10/24/24 11:57 pm CommentID:228264

participated in a course with a model eye and no supervision.

In medical school, we have the privilege of learning through interacting with thousands of patients. Through those years of experience, we learn that not everyone benefits from surgery. With every encounter comes a unique evaluation of the risks and benefits of surgery.

This regulation simply does not do enough to protect patients. Just because other states allow these procedures to be performed by optometrists does not mean that Virginia has to also. The citizens of Virginia deserve better.

Please protect them.

Sincerely,

Aziz A Khanifar, MD

Physician, The Retina Group of Washington

Chief, Pediatric Retina, Children's National Medical Center

President-elect, Washington DC Metropolitan Ophthalmological Society

Ryan Leavitt

Non-surgeon laser surgery in Virginia

Dear Ms. Moss:

I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).

I am shocked and disappointed that our government would make such a decision regarding our health and safety.

Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.

Sincerely,

Ryan Leavitt

10/25/24 12:09 am
CommentID:228265

Ophthalmologist

Patient safety

Serious concerns regarding laser surgery

10/25/24 12:11 am
P056

concern

certification

CommentID:228266

As a member of the Northern Virginia Academy of Ophthalmology and a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases. A plastic model is not enough. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required. This method of training is simply inadequate for anyone wishing to perform lasers and obviously threatens the safety of patients. As someone who is closely involved in the training of ophthalmology residents and fellows, I know the nuances of teaching procedural skills such as laser treatment to trainees. I would not allow my trainees to perform laser procedures unless they have been appropriately trained because I know the risks involved with laser treatment, especially by improperly trained individuals. I would not allow an optometrist with the minimum level of training included here to perform laser treatment on any of my patients or my family members because it is clearly inadequate. No patient should accept this and no regulatory body should find it acceptable to have such a low standard for patient safety.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider change to the draft regulations to ensure optometrists across the state are trained appropriately.

Nisha Patel

'Amendment to Proposed Regulations to Preserve Patient Safety

Dear Ms. Moss:

As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

10/25/24 12:42 am
CommentID:228267

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Ali Allahdina,
MD

Amendment to
Proposed
Regulations to
Preserve Patient
Safety

It is the duty of the Commonwealth to ensure the safety of its citizens. I therefore submit these comments regarding the proposed Board of Optometry regulations.

As the Board of Optometry finalizes the regulations for laser surgery certification, I am concerned about the regulations as stated and recommend amending the current draft to reflect more stringent requirements around proctored sessions to ensure critical patient safety.

While there are provisions for proctored care, the requirement of logging complications, and the requirement that didactic education include indications and complications. However, it seems an individual can meet the certification requirements by attending a didactic course or by performing these procedures in a proctored session on either a model eye or on a live patient. I strongly recommend amending the proposed regulations to require both didactic and live proctored cases.

10/25/24 2:41 am
CommentID:228268

Understanding the theory of laser therapy and the internal structure and shape of the eye, is not the same as performing the same surgery on living tissue. Patients come to the laser treatment with a myriad of physiologic conditions that can impact these surgeries. Eye movements, tremors, neurologic conditions, anxiety, and even at times breathing (especially in obese patients) can move the eye centimeters, when laser eye surgery treatment is in a sphere of microns. Bleeding and inflammation can obscure the view for accurate treatment. Errors on this scale can change the outcome for these patients and increase their risk of complications. Carefully proctored practice mitigates and substantially lowers that risk to a much more tolerable level.

If you look across various industries that involve safety risk, it is typical to require supervised live practice in addition to standard didactics. Pilots must have substantial amounts of proctored hours flying a plane prior to being able to do so alone or with customers, all after taking didactics and a test. The Commonwealth requires a minimum of 45 proctored hours of driving a car prior to getting a driver's license, again after didactics and tests. These standards ensure the safety of the public. We strongly believe it is in the best interest of patient safety to require proctored cases in live patients after didactics and testing prior to the Board approving an optometrist to operate one of these procedures.

Ophthalmologists are required to have extensive didactics as well as more than two hundred live proctored cases performed in their training prior to obtaining a medical license to practice. While we understand this number would be impractical to request, we believe it is reasonable to request ten live proctored capsulotomies, ten live proctored laser trabeculoplasties, and ten live proctored iridotomies for the safety of patients in the Commonwealth.

Would you allow your parent or child to have eye laser done by someone who has only ever worked on a plastic eye, and was proctored only once or twice?

It is my strong hope that the Board of Optometry will include these suggestions to strengthen patient safety in their draft regulations.

In response to allegations of endorsement, none of the following organizations have supported, endorsed or collaborated with the Board of Optometry in the process of their developing these regulations: the Virginia Society of Eye Physicians and Surgeons (the largest organization of ophthalmologists in the Commonwealth), the Northern Virginia Academy of

Ophthalmology (the second largest organization of ophthalmologists in the Commonwealth), or the American Academy of Ophthalmology (the largest national organization of ophthalmologists).

Additionally, it is important to highlight that there has been very little opportunity for the overwhelming opinion of ophthalmologists to be considered in the development of these regulations. That includes a single in-person comment opportunity that was opened within 48 hours of publication of the proposed regulations. It also includes the presence of only one single ophthalmologist (whose placement was not coordinated with the Virginia Society of Eye Physicians and Surgeons) on the Regulatory Advisory Panel that was responsible for reviewing various sections of the draft regulations. That panel was otherwise comprised of four optometrists and one citizen member. The representation on the panel was heavily geared toward the optometric profession, leaving room for minimal input from ophthalmologists, specifically regarding the required training and proctoring needed to maintain the highest level of patient safety.

The Board of Optometry's mission statement speaks of assuring patient safety. I encourage the Board to hearken back to its mission statement, protect the citizens of the Commonwealth, and tighten standards of approval to require in-person proctoring in *all* cases, and place patient safety ahead of convenience or practice business concerns.

Anonymous

Concerns

Dear Ms. Moss:

I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).

I am shocked and disappointed that our government would make such a decision regarding our health and safety.

Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons'

10/25/24 3:17 am
CommentID:228269

P060

		<p>requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>Sincerely,</p> <p>Very concerned citizen</p>	
Paul Mickelsen	Concerned about non-surgeons operating on eyes	<p>I am writing you as a concerned citizen in the Commonwealth. I did not previously know that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet.</p> <p>Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.</p> <p>Paul Mickelsen</p>	10/25/24 7:30 am CommentID:228270
Karoline Munson	Support in-office lasers by doctors of optometry	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 7:50 am CommentID:228271
Joe Blackstock	Support Laser procedures for Optometrist without any changes	<p>Optometrist are educated and will be certified to do these procedures that</p> <p>will provide better access to care to the patients across the state of Virginia.</p> <p>I support the laser bill without any changes. Thank you.</p>	10/25/24 8:05 am CommentID:228272
Mark MacMillan	Support laser regulations	<p>Please support the draft regulations as presented without any changes. Optometrists throughout the country, including Virginia, are educated, trained and certified to perform the procedures outlined in the regulations. More that 146,000 procedures have been performed by optometrists across the country. These procedures have been performed by optometrists since the 1990's.</p> <p>Thank you for your support.</p>	10/25/24 8:06 am CommentID:228273
Ryan Cook	Support laser regulations	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. More than 146,000 procedures have been performed by optometrists across the country. This is an effective procedure that increases access to safe vision care for all Virginians.	10/25/24 8:09 am CommentID:228274
Stephanie	Support	Hello! Please support Optometry regulations as written.	10/25/24 8:14 am P061

Matsko	Optometry Regulations as written	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. Thank you for your support.	CommentID:228275
William Dodge Perry	Support Laser Regulation	Optometry has been doing laser procedures elsewhere in the the country for decades. This regulation was developed with optometrists and ophthalmologists and should be accepted as written. The regulation does not need to be changed and will work well.	10/25/24 8:15 am CommentID:228276
Joseph Lebow, O.D.	Support optometry proposal as submitted	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented.	10/25/24 8:16 am CommentID:228277
James Cornetta, OD, FAAO	Support optometry regulations as presented	I support the draft regulations as presented. They were developed with input from optometry and ophthalmology and optometrists are educated, trained, and certified to perform these procedures.	10/25/24 8:17 am CommentID:228278
Dr. Obaidullah Faiq	Support optometry proposal as submitted	As a doctor of optometry I support the draft regulations as presented without any changes. In-office laser procedures have been performed by optometrists since the 1990's. More than 146,000 procedures have been conducted by optometrists nationwide. Thank you.	10/25/24 8:30 am CommentID:228279
Sidney Parks	Optometry Support	I have trust in my optometrist and their education and training. I fully support my optometrist and in-office laser procedures. I have supported optometrist use of lasers for many years. It would be very convenient to have laser procedures taken care of at my typical optometry office by my preferred, trusted optometry professional where I am most comfortable.	10/25/24 8:40 am CommentID:228280
Amanda Lindsey, O.D.	Support laser regulations	I support the draft regulations as presented which were developed with input from optometry and ophthalmology. Optometrists are educated, trained, and certified to perform these procedures.	10/25/24 8:42 am CommentID:228281
Robert L. Bass, OD, FAAO	Support In-office Lasers By Doctors Of Optometry	Doctors of Optometry are educated, trained and CERTIFIED to perform the procedures outlined in the regulations. Since 1990, more than 146,000 procedures have been performed by optometrists with in-office lasers. I support the regulations as presented.	10/25/24 8:53 am CommentID:228282
Sea Eye Care	Support in-office lasers by doctors of optometry	The as-presented draft regulations were developed with input from optometrists and ophthalmologists and should be supported as-is. In-office LASER procedures have been performed by optometrists for decades now in multiple other states across America.	10/25/24 8:57 am CommentID:228283
Claire Grew`	I Support Optometry	As a patient of an optometrist, I fully endorse these procedures. My longstanding relationship with my optometrist reinforces my desire to continue receiving their care. I have complete confidence in their professional expertise, training, and precision regarding my healthcare. This trust stems from their extensive knowledge and commitment to providing high-quality care.	10/25/24 8:57 am CommentID:228284

Cameron Lindsey, OD	Support Optometry Regulations as Presented	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 8:58 am CommentID:228285
Scott Dilzer	Support optometry regulations as presented	Draft regulations as presented were developed with input from both Optometry and Ophthalmology to help ensure safety for the general public. Support draft regulations as presented without changes. Optometrists have been performing laser procedures safely since the 1990's.	10/25/24 9:06 am CommentID:228286
Elice O'Hara	Support optometry regulations as presented	Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure and more than 146,000 procedures have been performed by optometrists across the country	10/25/24 9:13 am CommentID:228287
Susan Keene, OD	Support laser regulations	I urge you to support these regulations as written by a the RAP (Regulatory Advisory Panel) comprised of both optometrists and ophthalmologists. Optometrists have been trained in these procedures and in twelve states across the country laser procedures are currently performed in office by optometrists. Again, I urge support for these regulations.	10/25/24 9:13 am CommentID:228288
Brent Segeleon	Support in-office lasers by doctors of optometry	I support the draft regulation as proposed without any changes.	10/25/24 9:21 am CommentID:228289
Anonymous	Laser eye surgery	Laser eye surgery should be performed by ophthalmologists that have extensive training and can address complications if they occur. There are several ophthalmologists in the state so access is not an issue.	10/25/24 9:23 am CommentID:228290
Ranjani Panda, OD	Support optometry regulations as presented	<ul style="list-style-type: none"> • Support optometry regulations as presented 	10/25/24 9:37 am CommentID:228291
Anonymous	Concerned for patients	<p>Out of concern for the health and the sight of citizens of Virginia, I am asking you to recognize that the proposed regulation as written is dangerous.</p> <p>Laser surgery, even though it is performed with a laser and a not a scalpel, is still SURGERY. Surgery should only be performed by practitioners who have been properly trained. Proper training consists of both didactics and also live, proctored training involving a real patient.</p> <p>We would never be OK allowing a loved one to have a procedure performed by someone who had only participated in a course with a model eye and no supervision.</p>	10/25/24 9:38 am CommentID:228292

		<p>In medical school, we have the privilege of learning through interacting with thousands of patients. Through those years of experience, we learn that not everyone benefits from surgery. With every encounter comes a unique evaluation of the risks and benefits of surgery.</p> <p>This regulation simply does not do enough to protect patients. Just because other states allow these procedures to be performed by optometrists does not mean that Virginia has to also. The citizens of Virginia deserve better.</p> <p>Please protect them.</p>	
Ashley Ross	Full Support	I am and will always remain in support of in-office lasers for optometrists.	10/25/24 9:43 am CommentID:228293
Ben Lindorf	Request for Stricter Standards	<p>Dear Ms. Moss:</p> <p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).</p> <p>I am shocked and disappointed that our government would make such a decision regarding our health and safety. Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>Sincerely,</p> <p>Ben Lindorf</p>	10/25/24 9:46 am CommentID:228294
Matthew Jones, O.D.	Support in-office lasers by doctors of optometry	I support optometry regulations to perform in-office laser procedures for many reasons. Optometric education, training and these regulations are what allow ODs to safely perform in-office procedures. Optometrists are the primary eye care providers for the majority of the country and have safely performed these procedures in many states for many years. Thank you.	10/25/24 9:56 am CommentID:228295
Laura Stidham	I support Optometrists	I have seen my optometrist for years, and I am sur that he is educated and has been trained for this.	10/25/24 9:59 am CommentID:228296
Stacy Jaffe, OD	Support in-office lasers by doctors of optometry	I am writing in support of draft regulations as permitted without changes. Optometrists are educated, trained, and certified to perform produces outlined in the regulations.	10/25/24 10:00 am CommentID:228297
			P064

<p>Shakeel Shareef, MD</p>	<p>Concerned Physician and Surgeon</p>	<p>as a faculty member in several teaching programs spanning 2 decades, I have been responsible in training and supervising ophthalmology residents in training and those seeking recertification for laser surgery. I have seen cases of mishap in patients who are obese, or presenting with tremors when proctoring trainees. Live supervision is an essential part of training to ensure safety and guidance.</p> <p>I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.</p> <p>There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.</p> <p>To not amend this draft is to compromise the safety and well being of patients.</p> <p>Concerned Ophthalmologist and Citizen of the commonwealth state</p>	<p>10/25/24 10:01 am CommentID:228298</p>
<p>Vicki Farmer</p>	<p>Support in-office lasers by doctors of optometry</p>	<p>As a resident of one of the 12 states that include in-office laser procedures by optometrists, I fully support doctors of optometry performing in-office laser procedures. My husband receives excellent pre and post cataract surgery care, including a YAG capsulotomy, from his doctor of optometry, who is his trusted primary eye care physician. Optometrists are educated, trained and certified to perform the</p>	<p>10/25/24 10:06 am CommentID:228299</p> <p>P065</p>

		procedures outlined in the regulations and I fully support them as written.	
Brigman Harman	Concerned citizen	<p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the government is now allowing non-surgeons to operate on our citizen's eyes. What is more concerning is that the government is recommending a lower standard of care be expected of these non-surgeons than what is currently required for an eye surgeon ophthalmologists. This is totally unacceptable. Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to have the same laser training that ophthalmologists are required to have, including live proctored cases, prior to being allowed to operate on our eyes.</p> <p>Sincerely,</p> <p>Brigman Harman</p>	10/25/24 10:06 am CommentID:228300
David Johnson, OD	in support of draft regulation	I support the draft regulation as proposed without any changes. Optometrists are performing these laser procedures safely in other states. Optometrists have been performing the post-operative care for these procedures for even longer. The residents of Virginia will be appropriately cared for by optometrists in serving these needs.	10/25/24 10:11 am CommentID:228301
Noureen Khan, M.D.	Amendment to Proposed Regulations to Preserve Patient Safety	<p>Dear Ms. Moss:</p> <p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.</p> <p>There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.</p>	10/25/24 10:25 am CommentID:228302

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Sincerely,

Noureen Khan, M.D.

Giovanni DiSandro MD, EVMS Ophthalmology at ODU

Inadequate training standards

Dear Ms. Moss,

As a fellowship-trained ophthalmologist who has educated resident physicians for over ten years in clinical and surgical ophthalmology, I have grave concerns regarding draft regulations regarding proctoring for individuals seeking laser eye surgery privileges without extensive training or residency experience.

In training residents to perform any procedure, especially laser surgeries on the eye, close in-person demonstration and observation on a live patient with safety and accuracy being constantly monitored is absolutely necessary. There is a great deal of irreparable harm that can be done by poorly placed laser shots. Too little laser energy can be ineffective, too much can cause life-long visual complications.

I would add that, as with any surgery, patient selection is paramount and the decision not to perform a procedure is as important as the decision to proceed with one. For example, a yag capsulotomy is a relatively benign and common procedure performed for poor vision after cataract surgery; however, if a patient's poor vision is due to an incorrect intraocular lens, a laser procedure done too hastily will make it essentially impossible to have a surgical lens exchange performed and doom a patient to further procedures and difficult-to-correct visual deficits.

Ophthalmologists perform hundreds of different types of laser procedures during their years of training, starting in their first year with close observation and oversight, with an attending physician walking them

10/25/24 10:26 am
CommentID:228303

through patient selection, clinical decision making, the process of performing the laser surgery, the specific techniques of the procedure, post-operative patient education, follow-up, and management of complications. They are given more autonomy as they demonstrate mastery of each portion of the procedure. There is certainly much more to it than flipping on a laser, pushing a button, and zapping some holes.

As such, I must strongly recommend changing draft regulations to maximize training and observation of actual procedures, and extensive education on the selection of patients for procedures. Having been referred many patients that suffered complications, at times blinding ones, from inadequate or inappropriate outpatient care, I cannot recommend enough caution in training and expanding oversight. Overall, I fear patients will be showing up in my emergency department with more complications from unnecessary and incorrect elective procedures; all steps must be taken to prevent this from happening to patients in Virginia.

Sincerely,

Giovanni DiSandro, MD
EVMS Ophthalmology
Residency Program Director
Medical Director, Sentara/EVMS Lions Center for Sight

DR TENESHA
A.
BAZEMORE,
TIDEWATER
OPTOMETRIC
SOCIETY
PRESIDENT

Support in-office
lasers by doctors
of optometry

I have practiced Optometry for 29 years. Most have been in my home state of Virginia. This is a state where optometrists can perform procedures at the highest levels of our training. I am honored to be among 12 states offering optometrist the ability to provide in office laser procedures to patients who sincerely need this. Optometrist are educated, trained and certified to perform the procedures outlined in the regulations. Thank you for taking this moment to provide patients access to laser procedures by Doctors of Optometry

10/25/24 10:32 am
CommentID:228304

Peter Brown

Very Concerned
Citizen and Voter

Dear Ms Moss,

I am adding a comment directed to you today as I am very concerned about this legislation. I am a citizen in the Commonwealth and a resident of Fairfax County, a registered voter, a homeowner, a father, a businessman,

10/25/24 10:38 am
CommentID:228305

a healthcare professional and a community leader.

I have just been made aware that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes with no hands-on training (didactic/classroom coursework only).

This is just not right and very, very dangerous to turn loose on the public. I am shocked and disappointed that our government would make such a decision jeopardizing our health and safety. Based on this, I will absolutely avoid getting any of my planned laser surgeries or any family or friend's surgeries in the State of Virginia, as I now risk untrained hands using a laser on my eyes and permanently blinding me.

While I can understand the desire to expand access to resources to perform procedures, I know it unwise to turn loose untraining hands to perform medical procedures. It will also guarantee a class action lawsuit against the state and providers, which would come only after many people's lives have been ruined by irresponsible legislation.

I like this to giving teenage boys books and YouTube videos to learn how to drive, and then handing them over the keys to a Mustang GT muscle car and turning them loose on the highways and roads of Virginia. It is a disaster in the making, and all enabled by a government that is by and for the people, and to protect and serve.

I implore you to do anything and everything in your powers to ensure the highest standards of care possible in the Commonwealth. If we have to accept this unfortunate law, please force the regulations to mirror the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on the citizens of the Commonwealth.

Regards,

Peter Brown

Megan Morris

I Support Optometry

I have so much trust and faith in the training and education my optometrist has to perform these procedures.

Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented.

Optometrists are performing these laser procedures safely in other states and have been performing these

10/25/24 10:47 am
CommentID:228306

P069

		<p>procedures since the 1990s. The residents of Virginia will be appropriately cared for by optometrists in serving these needs.</p> <p>This legislation will prevent patients from duplicate visits and will reduce waiting times. Please support the draft regulations as written.</p>	
Dr Saima Cheema	LASIK surgery and procedures	<p>Dear lawmakers</p> <p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).</p> <p>I am shocked and disappointed that our government would make such a decision regarding our health and safety.</p> <p>Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>Sincerely,</p> <p>Dr. Saima Cheema</p>	10/25/24 10:48 am CommentID:228307
Dr. Sami Khaldieh	Support Optometry Proposal As Submitted	<p>I support draft regulations as presented without any changes. Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure. In-office lasers have been performed by optometrists since the 1990s, and as such, it's apparent that any further amendments to this proposed regulation would be unnecessary.</p>	10/25/24 10:51 am CommentID:228308
Gohar Choudhary M.D	Inadequate and dangerous standards	<p>Dear Ms. Moss:</p> <p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).</p>	10/25/24 10:54 am CommentID:228309

		<p>I am shocked and disappointed that our government would make such a decision regarding our health and safety.</p> <p>Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>Sincerely,</p> <p>Gohar Choudhary M.D</p>	
Caitlin Beeson	Support Regulations	I trust my optometrist and their education and training. I have been a patient for doctors of optometry for years. I have supported in-office lasers for optometrists since this started a year ago.	10/25/24 10:57 am CommentID:228310
Amanda	I Support Optometry	Please support Optometry regulations as written. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. Thank you for your support	10/25/24 11:00 am CommentID:228311
Stacy Hinkemeyer-Colatrella, President Minnesota Optometric Association	Support Optometry Laser Regulations as Presented	<ul style="list-style-type: none"> • Support draft regulations as presented without any changes • Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure <ul style="list-style-type: none"> • 12 states include in-office laser procedures by optometrists • More than 146,000 procedures have been performed by optometrists across the country • in-office lasers have been performed by optometrists since the 1990s • Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists. 	10/25/24 11:16 am CommentID:228312

		<ul style="list-style-type: none"> • Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor. • All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. 	
Brian Brandenburg	Non surgeons operating on eyes	<p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training.</p> <p>I disappointed and concerned that our government would make such a decision regarding our eyes' health. We have only have two of them and need to make sure that the most highly trained surgeons only are allowed to operate on them.</p> <p>Please do everything you can to ensure the highest standards of care for our eye health as possible in Virginia. If we have to live under this bad (in my opinion) law, please make the regulations as close as possible to the current surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>From a very concerned citizen,</p> <p>Brian Brandenburg</p>	10/25/24 11:17 am CommentID:228313
Dr. Courtney Shay	Support optometry regulations as presented	Optometrists are trained to perform these procedures as outlined in the current regulations. These regulations were designed with input from both Optometrists and Ophthalmologists and should remain as presented.	10/25/24 11:17 am CommentID:228314
Deirdre Middleton	Support optometry regulations without changes to improve care access in VA	As a 20+ year resident of Alexandria, VA, professional executive, mother and passionate health care advocate, I urge the board to pass the regulations for the implementation of these specific laser procedures without changes. Doctors of optometry are educated, trained and certified to perform the procedures outlined in the regulations. As primary eye health and vision care providers, they will increase access to this important care for Virginians across the state.	10/25/24 11:19 am CommentID:228315

		<p>Thank you,</p> <p>Deirdre Middleton</p>	
Dr. Afzal Rasheed	Concerned	<p>Dear Ms. Moss:</p> <p>I am writing you as a concerned citizen/physican in the Commonwealth. I did not previously know that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet.</p> <p>Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.</p> <p>Sincerely,</p> <p>Afzal Rasheed MD</p> <p>--</p>	10/25/24 11:19 am CommentID:228316
Robert M. Allen	Support Optometry Laser Regulations as Submitted	<p>I am writing to strongly encourage the adoption of the draft regulations allowing properly trained and certified Virginia optometrists to use lasers to perform certain approved ocular procedures. Legislation that lead to these regulations was passed by the Virginia General Assembly and signed by the Governor over two years ago. Since then, a regulatory process with the cooperation of ophthalmology has been underway to ensure that only trained and certified Virginia optometrists may perform these procedures. The training and oversight is very rigorous by design. To date, there are 12 states that allow in-office procedures by optometrists with over 146,000 performed to date. Further, lasers have been used in the treatment of ocular conditions by optometrists since the 1990's. For these reasons, it is reasonable and prudent to approve the draft regulations as proposed.</p>	10/25/24 11:23 am CommentID:228317
Amanda Colburn NMOA	Support optometry regulations as	Draft regulations as presented were developed with input from optometry and ophthalmology and should	10/25/24 11:26 am CommentID:228318

	presented	<p>be supported as presented.</p> <p>Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases.</p> <p>It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists.</p> <p>Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor</p>	
Rehan Waheed	Defeat the proposal	<p>Practicing beyond one's scope in medicine leads to poor outcomes</p> <p>I am reading the concerns MDs have for ODs performing laser surgery and see no reason to disregard them. There is no overwhelming societal reason to put people at risk whether actual or theoretical in this case.</p> <p>seems like optometrists want a financial gain without the training required.</p>	10/25/24 11:30 am CommentID:228319
Norma Spittle	Support Laser Regulations As Presented	<p>Please support the draft regulations as presented without any changes.</p> <p>Optometrists throughout the country, including Virginia, are educated, trained, and certified to perform procedures outlined in the regulations. More than 146,000 procedures have been performed by optometrists and they have done so since the 1990s.</p>	10/25/24 11:31 am CommentID:228320
Dr. Shannon Howell, O.D.	Support optometry regulations as presented	<p>Hello,</p> <p>Being a doctor of optometry in the state of Virginia, I fully support the regulations without any changes. Lasers are safe and are now considered first line treatment for glaucoma patents. Having twice as many optometrists as there are ophthalmologists in the state would only increase access to care for our patients. Optometrists are trained, educated, and certified to perform laser procedures outlined in the regulations.</p> <p>Thanks!</p> <p>Shannon A. Howell, O.D.</p>	10/25/24 11:32 am CommentID:228321
Mahvash Sheikh	Medical concern	<p>Dear Ms. Moss:</p> <p>I am writing you as a concerned citizen/physican in the Commonwealth. I did not previously know</p>	10/25/24 11:33 am CommentID:228322 P074

that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet.

Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.

Sincerely,
Mahvash Sheikh.

Sami Nasr MD	Concerned citizen MD about medical procedure inadequate training	<p>Dear Ms. Moss:</p> <p>I am writing you as a concerned citizen/physican in the Commonwealth. I did not previously know that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet.</p> <p>Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.</p> <p>Sincerely, Sami Nasr MD</p>	10/25/24 11:34 am CommentID:228323
Dr Troy Morgan	Support In-office Lasers by doctors of Optometry	Support the regulations including proctored sessions with model eyes. 12 states include in-office laser procedures by optometrists.	10/25/24 11:35 am CommentID:228324
Sushil Jain OD, Jain Healthcare Professionals	Support optometry regulations as presented	Dear Sir/Madam, I respectfully request you to keep the proposed language proposed language, and its content as is without any edits. As you know optometrists are educated trained and certified to perform procedures as proposed in the regulations. Furthermore, more than 140,000 procedures are performed in optometrists' office across the country since 1990.	10/25/24 11:37 am CommentID:228325

Thank you very much in advance for your support and consideration.

Dr. Sushil Jain

240-277-3039

Susan Ly, OD

Support optometry regulations as presented

Optometrists are trained to perform these procedures as outlined in the current regulations. These regulations were designed with input from both Optometrists and Ophthalmologists and should remain as presented.

10/25/24 11:40 am
CommentID:228326

John

Support for Optometry - Common Sense

Optometrists have been safely performing these procedures in other states for as long as 30 years. The safety data shows that optometrists perform these procedures just as safely as ophthalmologists. There is a growing need for eye care across the country, and there is not a growing number of ophthalmologists.

10/25/24 11:44 am
CommentID:228327

The biggest issue with the comments opposing this bill is that they are illogical and trying to take advantage of fear mongering aimed at a general public who might not understand the procedures and training involved.

-The biggest concern posed by ophthalmologist posting in opposition to this bill is the ability to be certified after proctoring on a model eye rather than a live eye. They say that optometrists should be held to the same standards. Yes, they had a lot of live proctoring on procedures during their training. But there are many procedures done in common practice by ophthalmologists that have only been around for a short time. I'd like to ask each of them how many live eyes they were proctored on before they started using those procedures that came about after their residency or fellowship training? How many of them went back for another residency or fellowship to keep up with new procedures? The answer is none.

-Another comment I've read more than once is that when complications arise, an ophthalmologist is more prepared and capable to deal with the complications. I read a list of complications from these laser procedures that included elevated intraocular pressure, bleeding, and retinal detachment. I'd like to ask any ophthalmologist who isn't a vitreoretinal surgeon how many retinal detachments they have repaired versus sending the patient to a vitreoretinal surgeon (as an optometrist would)?

-The description of optometrists as "non-surgeons" wanting to perform "surgery" is designed to mislead. The fact that it is THE comment I see more than any other from the lay people commenting shows how effective that line of arguing has been. Did you know that plucking an eyelash is coded as a surgery under the CPT guidelines? Removing a foreign body from the surface of the eye? Optometrist have been performing

minor surgical procedures that they are trained to do for ages. And guess what? Optometrists are being trained very well to perform these laser procedures now. The training of an optometrist has evolved massively in the last few decades. The generalization or surgeon vs non-surgeon is pointless. Optometrists are seeking to do procedures they are trained to do, and that optometrists in other states are doing (and have been doing for years).

Anonymous

Please- eye surgery by surgeons only!

Ms. Moss:

I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).

I am shocked and disappointed that our government would make such a decision regarding our health and safety.

Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.

10/25/24 11:44 am
CommentID:228328

Thomas Rozelle

Support in-office lasers by doctors of optometry

Doctors of Optometry are educated, trained and certified to perform the procedures outlined in the regulations. Since 1990, more than 146,000 procedures have been performed by optometrists with in-office lasers across multiple states.

10/25/24 11:45 am
CommentID:228329

Chris Stromberg

Concerned Citizen

Dear Ms. Moss:

I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).

I am shocked and disappointed that our government would make such a decision regarding our health and safety.

10/25/24 11:47 am
CommentID:228330

P077

Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.

Sincerely,

Chris Stromberg

Dr Brian S

Support in-office lasers by doctors of optometry

Optometry education and training support the regulation requirements of 2 proctored sessions per procedure.

12 states include in-office laser procedures by optometrists

Optometrists across the country have performed more than 146,000 procedures in-office lasers have been performed by optometrists since the 1990s

Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases.

It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of optometrists' overall eye care services.

Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.

All optometrists must be certified in laser procedures before performing them on patients. To become certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.

10/25/24 11:48 am
CommentID:228331

Craig Hoover, OD

Support optometry regulations as presented

Optometrists are required to have extensive training and must be certified before can perform procedure on patients. Across the county more then 146,000 laser procedures have been performed by optometrists.

10/25/24 11:53 am
CommentID:228332

Roshni Patel, Arlington Eye Center

Support for ODs to Perform Laser Yag Cap, PI, SLT

As an optometrist who has work in ophthalmology for over 12 years, I have managed and treated more ocular pathology than some of our cohorts in specialty

10/25/24 12:04 pm
CommentID:228333
P078

ophthalmology settings. We are the primary eye care providers and ophthalmologist are known for their surgical skill. There are hundreds of thousands of patients losing vision due to lack of access to an ophthalmologists or medication and minor glaucoma laser procedures can save their vision. Virginia has 2x more optometrist than ophthalmologist.

In more than 12 states, optometrists have performed over 140,000 laser procedures without complications. Optometrists who have access to laser machines are those who work in medical settings, treating and managing medical conditions to the full scope of the law. There should be no concern over discretion because the requirements that have been put forth for us to perform these procedures will ensure the safest care for patients' eyes. These regulations were developed with the input of ophthalmologist so there should be no concern from their group. We support the regulatory process and will comply fully to ensure that we are trained and competent. We have taken an oath to protect our patients' vision and ocular health and it will not be undermined.

Inova medical group

Non surgeons operating surgeries

Dear Ms. Moss:

I am writing you as a concerned citizen/physican in the Commonwealth. I did not previously know that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet.

Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.

Sincerely,
--

10/25/24 12:08 pm
CommentID:228334

Ross Chatwin OD

Optometrists are proficient and safe to perform in office laser procedures

As an optometrists in Utah I do not have the opportunity to help my patient receive YAG capsulotomies for a post cataract condition that occurs up to 50 percent of the time. I cannot offer a superior treatment for my glaucoma patients because I can't perform a Selective Laser Trabeculoplasty. I was trained and required to be proficient in these procedures in order to graduate from optometry school. In addition, my own state's Department of Professional License Review found allowing optometrist to perform these procedures would benefit Utahs residents.

10/25/24 12:09 pm
CommentID:228335

		<p>Multiple studies have found optometrists are safe and proficient in performing these procedures. Why then are optometrists not permitted to perform these procedures in every state of the US? Protectionism. Ophthalmology controls this market are simply doesn't want to give it up. They will use "safety" as a cudgel to beat down any argument, study, state recommendation to protect their turf. I ask you to put the citizens of Virginia first. Optometrists have done all the hard work and the democratic process has given them the opportunity to help their patients. Don't allow regulatory red tape to stop the democratic process from taking affect.</p> <p>Thank you for your consideration.</p> <p>Dr. Ross J. Chatwin</p>	
Mollie Glenn, OD	Support optometry regulations as presented	<p>I am in full support of draft regulations as presented as they were developed with input from optometry and ophthalmology and should be supported as presented. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. Optometrists would never engage in any procedures to cause harm to a patient. Virginia has almost twice as many optometrists than ophthalmologists and it makes sense that more access to these procedures will save vision! I am in FULL SUPPORT of VIRGINIA OPTOMETRY and you should be as well!</p>	10/25/24 12:12 pm CommentID:228336
RVA Eye Care	Support	<p>Optometrists are well-trained primary eye care providers spending 4-5 years post undergrad. In many states we already are legally performing specific laser procedures such as laser peripheral iridotomy for glaucoma or YAG laser capsulotomy to treat secondary cataracts. This ability stems from our training and knowledge of the eye with hands-on clinical training in school and continuing education. We have extensive training in ocular disease management and diagnostic techniques, therapeutic procedures, including laser applications.</p> <p>There are no studies showing reduced patient safety, in fact the opposite. As more patients are able to receive care from more clinically trained eye doctors, patient care improves. Withholding this ability is only related to keeping \$ in 1 hand vs the other.</p>	10/25/24 12:12 pm CommentID:228337
Abigail Robinson	I Support In Office Lasers for Optometrists	<p>I have been seeing my optometrist for many years, and I am confident in their training and education surrounding in office lasers. Since this discussion started years ago, I have supported in office lasers for ODs .</p>	10/25/24 12:14 pm CommentID:228338
Paul Barney,	Support optometry	Optometrists have been performing laser procedures in	10/25/24 12:18 pm

<p>OD, Trustee, Board of Trustees, American Optometric Association</p>	<p>regulations as presented</p>	<p>other US states for over 20 years. Studies have shown that optometrists performing these procedures have similar results and safety profiles as ophthalmologists performing the same procedures. I personally have been performing laser procedures for several years without any significant adverse outcomes. The regulations and educational requirements outlined by the Virginia Board of Optometry are the same as those required for my licensure; that education and training has allowed me to safely and successfully perform in office laser procedures on my patients for many years. I support the laser regulations as presented without changes.</p>	<p>CommentID:228339</p>
<p>Angela Morgan</p>	<p>Support optometry proposal as submitted</p>	<p>Laser procedures are legal for optometrists to perform in 12 states. Over 146k laser procedures have been performed by optometrists with zero resulting malpractice suits, so obviously optometrists are perfectly capable of performing these without harm to patients. Optometry schools have been teaching laser procedures for decades at this point, optometrists spend more than 10000 hours training to diagnose and treat eye diseases, to imply that there is nothing but a "weekend" course involved is disingenuous at best.</p>	<p>10/25/24 12:19 pm CommentID:228340</p>
<p>Steven Miller, OD</p>	<p>Support optometry proposal as submitted</p>	<ul style="list-style-type: none"> • Draft regulations for limited laser procedures, as presented, were developed with input from optometry and ophthalmology and should be supported. • Optometrist's are strictly regulated and must be certified in these limited procedures. 	<p>10/25/24 12:19 pm CommentID:228341</p>
<p>Mark Meadows, O.D. Eastern Eye Associates</p>	<p>Please support optometry regulations as presented</p>	<ul style="list-style-type: none"> • Draft regulations as presented were developed with input from optometry and ophthalmology. • All optometrists must be certified in laser procedures before performing them on patients. • To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. • 12 states include in-office laser procedures by optometrists and more than 140,000 procedures have been capably performed by optometrists in service to their communities. • Doctors of Optometry have served and will continue to serve the citizens of Virginia by adhering the same standards of care required of a professional rendering care to the patients of their communities. <p>Draft regulations should be supported as presented.</p> <p>Respectfully submitted,</p> <p>Mark Kinney Meadows, O.D.</p> <p>Gloucester, Virginia</p>	<p>10/25/24 12:19 pm CommentID:228342</p>
<p>Anonymous</p>	<p>Support</p>		<p>10/25/24 12:24 pm</p>

	Optometry Regulations as Presented to increase access to care for patients!	Access to care for patients is extremely important. Allow eye doctors to treat patients!	CommentID:228343
Pauline Gee	Support optometry laser regulations	I strongly urge you to pass the laser regulations as presented. Optometrists undergo an extensive certification process meeting rigorous standards and ultimately must pass a national exam. Twelve states have already adopted this. The general public will benefit due to increased access by competent and skilled pool of optometrists.	10/25/24 12:25 pm CommentID:228344
Dr. Samuel C. Smart OD FAAO	Support optometry regulations as presented	I have practiced in Virginia since 1977. During that time our regulations have been changed a number of times to expand the treatments and procedures that doctors of optometry can perform for their patients. I served two terms on the State Board of Optometry so I am well aware of the safeguards that are put in place with every scope of practice expansion. Each time the scope of practice has been expanded the public has benefitted from improved availability of care. In no case has care been compromised. With twice as many Doctors of Optometry in Virginia as ophthalmologists this expansion wil further improve care for the citizens of Virginia .	10/25/24 12:28 pm CommentID:228345
Amanda Buttenshaw	Support Optometry Laser Regulations as Submitted	The draft regulations as presented were thoughtfully developed with input from optometry and ophthalmology and should be supported as presented. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 12:29 pm CommentID:228346
kevin coolbaugh, OD	Support Optomtery laser bill	Good afternoon, I am an Optometrist that has been practicing in an Ophthalmology clinic in Roanoke, VA since 1996. We have multiple MDs and ODs and all of out optometrists regularly participate in both the preop and post op examinations of patients having ophthalmic surgeries. I routinely tell my patients that the laser capsulotomy procedure is a simple 2-3min procedure and rarely has ocular complications. I do not ever seeing a complication associated with the procedure in the 28 years I have practiced in this medical practice. Please support the passing of this bill as it will continue to serve the aging population that are already having a hard time getting in to see the ophthalmologists. Thank you for your consideration. Kevin T Coolbaugh, OD	10/25/24 12:30 pm CommentID:228347
Anne Braim O.D.	Support optometry regulations as presented	<ul style="list-style-type: none"> • Support draft regulations as presented without any changes • Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented • Optometrists are educated, trained and certified to perform the procedures outlined in the regulations • Virginia has almost 2X more optometrists than ophthalmologists, making access to these 	10/25/24 12:32 pm CommentID:228348 P082

		<p>procedures less burdensome to the working poor.</p> <p>Respectfully,</p> <p>Anne Braim O.D., Gloucester Virginia</p>	
Dr. Sebastian Azocar	Support in-office lasers by doctors of optometry	<p>Lasers have become an invaluable method of non-invasively treating vision-threatening conditions, some of them being time-sensitive. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.</p> <p>Many Virginians who do benefit from essential laser procedures are already limited in obtaining care due to mobility restrictions, limitations in transportation to yet another doctor's office, and the delay in eventually being scheduled to see yet another doctor. As Optometrists we often find and would be able to immediately treat patients with non-invasive lasers without further inconveniencing patients or risking their sight due to time and scheduling conflicts.</p> <p>Supporting in-office lasers by Optometrists already trained in laser procedures is in the best favor of keeping Virginia healthy.</p>	10/25/24 12:41 pm CommentID:228350
Dept of Defense Medical	Full Support of Full Scope expansion	<p>Wonderful regulatory guidance here folks. As a federal employee in VA, this is exciting that I can finally practice in VA the way I practice on-site in a federal facility.</p> <p>Expansion ensures more certification procedures, greater oversight, and increased proficiency for the profession. VA is behind many other states with this regulation, but I am impressed by the bill presented as it is the most fair.</p> <p>I am excited to see how this increases access-to-care, and raises the standard-of-care practice (both Optometry and Ophthalmology!). As an OD who has supervised 1st year Ophthalmic residents, this is a long time coming and will only make each profession better.</p>	10/25/24 12:44 pm CommentID:228351
Dr Steven Plaxco	Support for Bill as is, no changes.	<p>Agree with the regulation; great work. I was certified for these procedures in 2017. I practiced them in our medical schooling. They have been performed by optometry doctors since at least 1998, and this is nothing new. The non-support seen here is overly simplistic in the why: an inherent prejudice against the profession of optometry.</p> <p>As a state, VA cannot match my credential via reciprocity for these skills at current. I am looking forward to seeing the medical community as a whole having a raised standard of care by the effects of this</p>	10/25/24 12:55 pm CommentID:228352

		bill.	
Brittney Carlos	Legalize Full scope Optometry	Optometry doctors are exposed and trained to perform laser therapy in the doctoral programs of Optometry school. With the growing population needs in the state of Virginia, it would benefit the public to allow their primary eye doctors, optometrists, to handle more of their care for procedures that do not require a surgical team. Optometrists are also trained to prescribe all the medications that aid in recovery after laser therapy, so it only makes sense that laws allow the profession to execute laser procedures Optometrists are trained to do. and also allow Optometrists to continue to advance their abilities with equipment they are comfortable and trained in manipulating.	10/25/24 12:59 pm CommentID:228353
Shannon Franklin, OD	Support optometry regulations as presented	Doctors of optometry are well-trained and agree with being certified in laser procedures before performing them on patients. The certification outlined in the regulations are more than adequate since we already have extensive training in glaucoma, cataracts, and other diseases and the skills to perform the procedures. Please support the optometry regulations as presented. Shannon Franklin, OD	10/25/24 1:05 pm CommentID:228354
Chris Deibert, OD	Virginia Laser Surgery Certification	I am writing in full support of the current laser regulations as promulgated without modification. As the sole eyecare facility in a county of 24,000, we have patients driving at least an hour to receive the proposed allowed procedures that could be performed in our office. This is an unnecessary burden for our citizens that will be ameliorated by implementation of this law. As stated by others, thousands of Optometrists all over the country are performing SLT, laser PI and YAG Capsulotomies safely and effectively. Thanks for your time.	10/25/24 1:09 pm CommentID:228355
Matthew Aldrich	Support of optometry regulations	Optometrists are fully qualified to use lasers. There are nearly twice the number of optometrists as there are ophthalmologists. Also many MD's are delegating lasers procedures in their office to PA's (who have no training compared to optometrists) because they do not have time, because the reimbursement is not very high, and because it is such a safe and simple procedure.	10/25/24 1:10 pm CommentID:228356
Felicia Butner	Support	I am a patient of an optometrist and I have been seeing my optometrist for years. I trust their education and training and support them and these procedures.	10/25/24 1:16 pm CommentID:228357
Elton Brown,, OD	Va Optometry Laser Regulations	Support Draft Regulations as presented	10/25/24 1:17 pm CommentID:228358
Belinda R. Starkey, OD	Support optometry regulations as presented	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. Support draft regulations as presented without any changes.	10/25/24 1:18 pm CommentID:228359
Dr. Tim Ansley, Alabama Eye	Support in-office lasers by doctors	It was great to see the commonwealth pass this legislation 2 years ago to update scope of practice to	10/25/24 1:20 pm CommentID:228360

Partners	of optometry	what surrounding states are performing, and to what optometry schools are training. More than 146,000 procedures have been performed by optometrists across the country. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.	
Jonathan Noble, OD	Support laser regulations	Please support the regulations as proposed and without further delay.	10/25/24 1:23 pm CommentID:228361
William C. Holcomb, OD, FAAO	Support in office laser procedures by certified Optometrists	Please support the Optometric laser regulations as written without changes. Optometrists have been performing these procedures in other states since the 1990s.	10/25/24 1:26 pm CommentID:228363
Alan Toler OD, FVAO, FCOVD	Pass Optometry regulation as proposed	All the hard work, deep thinking and push back has been done by smart doctors form both sides of this law. Pass Optometry regulation as proposed. Alan Toler OD, FVAO, FCOVD	10/25/24 1:29 pm CommentID:228364
Patricia Daylor	Support optometry laser regulations as submitted	This is good for Virginians. There are 12 states that already include in-office laser procedures by optometrists. There have been over 146,000 procedures performed by optometrists across the country. Optometrists have been preforming lasers since the 1990s.	10/25/24 1:44 pm CommentID:228365
Tracy poling	Support laser regulations	Hello! Please support Optometry regulations as written. Optometrists are educated, trained, and certified to perform the procedures outlined in the regulations. Thank you for your support.	10/25/24 1:44 pm CommentID:228366
Richard Montoya, New Mexico Optometric Association	Support optometry regulations as submitted	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. Please support draft regulations as presented without any changes.	10/25/24 1:45 pm CommentID:228367
Teri Geist, OD	Support Optometry regulations as presented	As a member of the American Optometric Association's Board of Trustees, I fully support the draft regulations, as presented without any changes. Doctors of Optometry are fully educated, trained, and certified to perform the procedures outlined. The procedures were developed with input from both optometrists AND ophthalmologists. Therefore, I urge the board to support the regulations as presented.	10/25/24 1:53 pm CommentID:228368
Justin Sherman	Support optometry regulations as	Optometrists are educated, trained, and certified to perform the procedures outlined in the regulations.	10/25/24 2:00 pm CommentID:228369

	presented	There have been more than 146,000 laser procedures performed by ODs in 12 states over the last two decades. Optometrists have done far more than a "weekend course" to develop the skills to provide quality eye care. They train over 10,000 hours to learn how glaucoma, cataracts, and other diseases are diagnosed and treated.	
Julie Nguyen	Support laser regulations	<ul style="list-style-type: none"> • Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented • Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists. <p>Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.</p>	10/25/24 2:02 pm CommentID:228370
Ryan Kern, OD	Pass Regulations as Drafted	As an optometrist who has trained and performed the relevant procedures on hundreds of patients over the course of approximately 4.5 years out of state without incident, many oppositional comments and concerns on this forum are speaking from a perspective of pure political bias mixed with a fundamental lack of knowledge regarding optometrists' capabilities disguised as caring for patient safety. Any true concerns are addressed by the regulations set forth. That is why they were drafted in the first place.	10/25/24 2:06 pm CommentID:228371
Caroline Fontaine	Support Laser Regulations for Virginia	Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure. All optometrists must be certified in laser procedures before performing them on patients. They must have extensive clinical experience, complete hands-on training and pass the national certification exam to be certified.	10/25/24 2:07 pm CommentID:228372
		Please support the draft regulations as presented.	
Chris Kuc	Support Optometry Regulations as Proposed	I am writing to support the regulations presented without any changes. Understanding that this was developed with the input of optometrist and ophthalmologist, and a 2024 review of nearly 150,000 laser procedures performed by optometrist in America were safe and effective, this should be supported as presented.	10/25/24 2:10 pm CommentID:228373
			P086

Amanda Martin, O.D.	Support laser regulations	Please support draft regulations as presented without any changes. 12 states already include in-office laser procedures by optometrists. Virginia optometrists are educated, trained, and certified to perform the procedures outlined in the regulations.	10/25/24 2:12 pm CommentID:228374
DJ Gonzales, Optometric Physicians of Washington	Support optometry regulations as presented	<p>The Optometric Physicians of Washington are in complete support of Virginia Optometrist performing these in-office laser procedures as outline in the draft regulations. It is an exciting time for patients in Virginia who will now have better access to excellent eye care.</p> <p>Best regards, OPW Executive Committee</p>	10/25/24 2:12 pm CommentID:228375
Steven T Reed, O.D.	Support Laser Regulations	As a member of the American Optometric Association’s Board of Trustees, I fully support the draft legislation, as presented without any changes. I have personally been doing laser procedures for several years using the same education and regulations as outlined in Virginia. These in-office procedures have greatly benefited my patients by allowing needed access to care that otherwise would have been unavailable. The citizens of the Commonwealth of Virginia deserve the same quality and access to care.	10/25/24 2:16 pm CommentID:228376
Kevin Green, OD	I Support Optometric Utilization of Lasers	Optometric laser laws have been in existence since the 1990's. There are now 12 states certifying optometrists for the sole three procedures that would be permitted in Virginia, namely YAG capsulotomies, selective laser trabeculoplasty, and peripheral iridotomies. Over 145,000 have been performed to date by optometrists. I believe this track record demonstrates that optometrists are more than capable of offering these procedures to our patients. Neither the Virginia legislature, the Governor, nor the Virginia Board of Optometry can create a standard of care. Only the community of eye providers including both optometrists an ophthalmologists create this standard due to what a qualified and reasonable medical professional do would do under the same circumstance. Optometrists and ophthalmologists are already held to the same standard of care.	10/25/24 2:17 pm CommentID:228377
Tad Kosanovich, OD, American Optometric Association	Support optometric lasers as submitted	As a member of the American Optometric Association’s Board of Trustees, I full support the draft legislation, as presented without any changes. Doctors of optometry have safely been performing these procedures since the 1990’s, with over 146,000 performed to date. Optometric education, training and certification allows doctors of optometry to safely provide these in office treatment options for their patients and supports the regulation requirements of 2 proctored sessions per procedures. The presented regulations were developed with input from optometry and ophthalmology, therefore should be supported as presented.	10/25/24 2:26 pm CommentID:228378

		As an optometric physician practicing in Florida I see patients from all over the country. Many from states where optometric laser procedures are performed and never observed a single complication from those treatments.	
Michael Swatts	Support optometry regulations as presented	<p>I fully support the proposed regulations as drafted, without any alterations. These regulations recognize that optometrists are educated, trained, and certified to perform the specified in-office laser procedures safely and effectively. Currently, 12 states authorize optometrists to provide these laser services, and they have proven to be safe and beneficial for patients, with optometrists across the country successfully completing over 146,000 such procedures since the 1990s.</p> <p>Optometrists undergo nearly 10,000 hours of training in diagnosing and treating glaucoma, cataracts, and other eye conditions, equipping them with the expertise necessary to perform these procedures as part of comprehensive eye care. Additionally, it is common practice for medical professionals, including optometrists, to engage in ongoing continuing education to enhance their skills and expand their scope of practice. While it requires much more than a “weekend course,” integrating laser procedures with other training is a natural and essential progression for optometrists to meet the needs of today’s patients.</p> <p>In Virginia, where the ratio of optometrists to ophthalmologists is nearly two-to-one, allowing optometrists to perform these procedures will significantly improve access to care, especially for working-class and economically disadvantaged communities. This regulatory change will provide a much-needed boost to accessible eye care, helping Virginians receive timely and quality treatment without undue travel or delay.</p>	10/25/24 2:36 pm CommentID:228379
Paul C. Ajamian, OD Dipl American Board of Optometry	In-office laser use by doctors of optometry	As an educator and clinical instructor for over 40 years, and the Vice President of the Georgia State Board of Optometry, I am in full support of the laser regulations proposed by the Virginia State Board of Optometry. Doctors in 10 other states are using lasers successfully, including many former students and residents of mine. Once this law is enacted, the citizens of Virginia will have access to safe, affordable and timely medical eye care.	10/25/24 2:39 pm CommentID:228380
David Rose OD	Support Optometry Regulations as Presented	<p>Proposed changes to regulations are unneeded. The argument that there are a variety of patients with varying difficulty falsely gives the impression that optometry lacks training. Before leaving school, optometrists have completed thousands of hours of training and have also spent thousands of hours seeing patients of varying difficulty.</p> <p>Optometrists are educated, trained and certified to</p>	10/25/24 2:46 pm CommentID:228381

		<p>perform the procedures outlined in the regulations.</p> <p>In 12 other states more than 146,000 procedures have been performed by optometrists and these procedures have proven that optometrists perform these procedures safely and successfully.</p> <p>Thank you.</p>	
Ryan Bigos	Support Optometry Regulations as Proposed	I have worked extensively with trained OD's in Virginia and know they are fully capable of these procedures. No reason to decline these proposed regulations with proper training and oversight.	10/25/24 2:50 pm CommentID:228382
Timothy LaFreniere	Support optometry proposal as submitted	<p>-Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.</p> <p>-All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.</p>	10/25/24 2:50 pm CommentID:228383
Dr. Nina Cox, Optometrist	Support in-office lasers by doctors of optometry	<p>Please support draft regulations as presented without any changes. The draft regulations were developed with input from optometrists and ophthalmologists and should be supported as presented. Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure.</p> <p>12 states include in-office laser procedures by optometrists. More than 146,000 procedures have been done by optometrists across the country. These regulations will allow Virginia citizens to have more timely, cost efficient healthcare; especially in rural areas.</p> <p>Thank you,</p> <p>Nina Cox, OD</p>	10/25/24 2:53 pm CommentID:228384
Lori Roberts Hauser	Support Optometry Regs	Optometrist are educated, trained, and certified to perform the procedures outlined in the regulations.	10/25/24 3:04 pm CommentID:228385
Dawn Arnold, OD - President, New Jersey Society of Optometric Physicians	Support optometry regulations	<p>The New Jersey Society of Optometric Physicians (NJSOP) is pleased to know that Virginia has passed a law to modernize optometry. The expanded scope of practice aligns with current optometric education and training.</p> <p>More than 146,000 procedures have been performed by optometrists across the country with excellent safety records.</p> <p>The NJSOP encourages support of optometry regulations.</p> <p>Dawn Arnold, OD NJSOP President</p>	10/25/24 3:13 pm CommentID:228386
Kristin Sullins, OF	Support optometry proposal as	Optometry education and training supports the regulation requirements of 2 proctored sessions per	10/25/24 3:14 pm CommentID:228387

	submitted	procedure.	
Katie Davis Tarver, OD, Vision Therapy Institute	Support optometry proposal as submitted	I am writing to offer my support of the draft regulations as presented without any modifications-- these modifications were thoughtfully compiled by optometry and ophthalmology and should stand as submitted. Optometrists are highly education and should provide for their communities as taught by accredited academic institutions. Access to eye care is paramount for health, especially in rural areas like Virginia (and South Carolina) where access to optometrists is significantly easier than accessing ophthalmologists.	10/25/24 3:15 pm CommentID:228388
Dr. Kevin Campbell - South Carolina Optometric Physicians Association	Support in-office lasers by doctors of optometry	To whom this informs, On behalf of the South Carolina Optometric Physicians Association, we are in full support of the current draft regulations as presented without any changes. This will improve the overall access to care and healthcare to the Virginia residents. Optometrist are highly skilled physicians with extensive training to perform these procedures and make the lives of patients better.	10/25/24 3:18 pm CommentID:228389
Stephen S. Jennings	Support optometry laser regs.	Please support the optometry laser proposal as submitted as the draft regulations were developed with input from not only optometry but also ophthalmology. The optometrists doing the procedures must be certified beforehand. To be certified they must have extensive education, clinical experience, complete hands on training, and pass a national certification exam. I appreciate your time in considering and supporting the regulations as drafted.	10/25/24 3:46 pm CommentID:228390
Stacey	I am in support of this.	I am in support of my optometrist. I fully support these procedures being in the hands of highly educated and trained optometrist. I have been seeing my doctor for years and I trust that their education and training are reliable and more than capable for these procedures.	10/25/24 3:50 pm CommentID:228391
Optometry Student	Support optometry proposal as submitted	Doctors of Optometry are fully certified to perform the procedures outlined in the draft.	10/25/24 3:51 pm CommentID:228392
Mona Kaleem, MD, Johns Hopkins University, President - Maryland Ophthal Soc	protect our patients	Dear Legislators, I am concerned about a dangerous new proposal that would allow non physicians to perform procedures on the eyes of patients in Virginia. As an academic physician, teacher, and surgeon, I urge you to review publications and data that point to poor outcomes and frank harm that can occur to patients who have procedures by those who do not undergo rigorous training, board examination, and licensing. I have been training young surgeons for over 10 years and I can attest to the fact that it takes years of education and training to perform eye laser procedures safely.	10/25/24 3:51 pm CommentID:228393

Physician and non physician eye care providers work very well in a number of settings and complement one another's work, but procedures are very delicate and a non physician cannot replace a physician in this capacity.

I am worried about patients with less education and fewer resources to understand who is providing their care. There are misconceptions about who physicians and non physicians are. These patients are vulnerable. Many of them are from lower socioeconomic levels and from minority groups in VA. Please protect our patients.

Mona Kaleem, MD

Associate Professor of Ophthalmology

Johns Hopkins University

President - Maryland Society of Eye Physicians and Surgeons

Jeff Anastasio,
O.D.

Support of
Optometric
Surgery

I am a practicing Optometrist in Louisiana, a state which allows all of the procedures allowed in the language written. I am a past president of the Louisiana State Board of Optometry Examiners, an original and current member of the Laser and Surgical Procedures Exam Committee a national examination given by the National Board of Examiners of Optometry. During my five year tenure on the Louisiana State board of Optometry we had no complaints filed against any optometrists by members of the public or anyone else stating a poor outcome of Optometric Surgery in Louisiana. At the time my term on the board ended there were over 14,000 procedures done by Louisiana Optometrists and no negative outcomes reported. Optometrists have been doing these same procedures in states across the country for years and the results have been the same, overwhelming successful positive outcomes. The same will be true for the public in Virginia. When this legislation becomes law the citizens of Virginia will have better access to care and this legislation will improve access to eye care in Virginia at a time where so many areas are undeserved.

10/25/24 3:55 pm
CommentID:228394

Jonathan
Shrewsbury

In office laser
procedures

In Kentucky we have been doing laser procedures for over a decade. As a former 8 year member of the Kentucky Board of Optometric Examiners, I can attest to the fact that not one complaint has occurred in regards to treatment of any patient. Ophthalmology has

10/25/24 4:06 pm
CommentID:228395

P091

		<p>tried to confuse the public on “surgical” procedures and the fear tactic.</p> <p>The truth is that there are public protections in regulations and it is very patient friendly and leads to overall health care cost reduction.</p> <p>I strongly encourage your Board to pass these patient care procedures and be an advocate for quality healthcare.</p> <p>Jonathan Shrewsbury O.D.</p>	
Cody Jones	Support Optometry Regs	<p>Please support the regulations as currently written. There are now 12 states that include in office laser procedures by optometrists with a stellar track record of safety. Thank you.</p>	10/25/24 4:08 pm CommentID:228396
Tom Cruse, OD	Support Optometry in VA	<p>As a member of the American Optometric Association, Colorado Optometric Association (COA), past President of COA, and someone who was on the fore front of passing Colorado's scope of practice law a few years ago I fully support the draft regulations, as presented without any changes for the optometrists in VA.</p>	10/25/24 4:14 pm CommentID:228397
Rodney Peele	I trust my optometrist	<p>Having lived, worked, or attended school in Virginia for 28 years, including the last 16, and as a patient of optometrists in the Washington DC metropolitan area throughout that time, I support the draft laser regulations for optometrists as presented.</p>	10/25/24 4:47 pm CommentID:228398
Lauren Stirling, OD FAAO	Support in-office lasers by doctors of optometry	<p>I fully support the use of in-office lasers by optometrists. Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Doctors of optometry train for over 10,000 hours and must be certified in lasers before performing them on patients.</p>	10/25/24 4:56 pm CommentID:228399
James Sandefur	Optometry Proposed Rules	<p>As a member of the Louisiana Optometry licensing board for over 35 years I have seen the benefits to the public of the law allowing Doctors of Optometry to perform ophthalmic laser surgery procedures. I urge the state of Virginia to adopt the proposed rules allowing doctors of Optometry to perform these procedures.</p>	10/25/24 5:02 pm CommentID:228400
Alex Melamud	Concern about patient safety	<p>Dear Board,</p> <p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved.</p>	10/25/24 5:08 pm CommentID:228401

Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Alex Melamud MD

Dr. Jacqueline Bowen,
American
Optometric
Association

Support Laser
Regulations

As President-Elect of the American Optometric Association's Board of Trustees, I heartily support the draft legislation, AS PRESENTED WITHOUT ANY CHANGES. Doctors of optometry have safely been performing these procedures since the 1990's, with over 146,000 performed to date. Optometric education, training and certification allows doctors of optometry to safely provide these in office treatment options for their patients and supports the regulation requirements of 2 proctored sessions per procedures. The presented regulations were developed with input from optometry and ophthalmology, therefore should be supported as presented.

10/25/24 5:08 pm
CommentID:228402

Sue Weingartner,
Montana
Optometric
Association

Support
Optometry Prosal
as Submitted

We have reviewed the Virginia proposed regulations that were developed with input from optometry and ophthalmology and we support these as presented. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.

10/25/24 5:13 pm
CommentID:228403

Emily Gibson

Support
Optometry laser
regulations

Optometrists are educated trained and certified to perform the procedures outlined in the regulations. Before performing these procedures on patients optometrists must have extensive clinical training, hands-on experience, and have passed a national certification exam. Virginia has almost 2 times more optometrist than ophthalmologists making access to these procedures less burdensome to the working poor. Optometrist are trained to do these procedures and can help healthcare access to Virginia residents.

10/25/24 5:14 pm
CommentID:228404

Vaughn Parfitt, OD SCOPA President	Support Optometry regulations as presented	I strongly support the draft regulations as they are now. These were developed in collaboration with Optometry and Ophthalmology and should stand.	10/25/24 5:15 pm CommentID:228405
Will Mann, 4th year OD student	Support Optometry and better patient care	As an optometry student, we learn these simple laser procedures that greatly help our patients. Personally, I have gotten experience with them in school and these procedures greatly reduce patient hassle by avoiding additional copays, office visits, travel and unnecessary referrals to other offices for simple procedures we can easily perform. Please keep Virginia advancing in the medical field and improving patient care through this bill.	10/25/24 5:17 pm CommentID:228406
G. Kevin Kasovich, O.D., Louisiana State Board of Optometry Examiners	Support optometry regulations as presented	<p>To whom it may concern:</p> <p>I fully support the draft regulations as presented, allowing optometrists in Virginia to perform laser procedures. As an optometrist in Louisiana, where these procedures have been safely performed since 2014, I can attest to the benefits for our patients.</p> <p>Virginia has nearly twice as many optometrists as ophthalmologists, and by allowing optometrists to perform in-office laser procedures, the state can significantly improve access to quality care. With more than 146,000 procedures performed nationwide, I urge you to support these regulations as written to expand care in Virginia.</p> <p>Respectfully, G. Kevin Kasovich, O.D. President Louisiana State Board of Optometry Examiners</p>	10/25/24 5:25 pm CommentID:228407
Philip Flynn, OD	Support Optometry Regs	Optometrists are educated, trained, and certified to perform the procedures in the regulations and I support them without any changes. Optometrists have performed in-office laser procedures since the 1990s. Optometrists performing in-office laser procedures allow better patient access to care.	10/25/24 5:35 pm CommentID:228408
Christopher Quinn, OD	Support optometry regulations as proposed	Patients in Virginia will experience improved access to high quality care from Optometrists when they perform laser care upon adoption of these regulations. Optometrists in Virginia are highly trained doctors and should be allowed to practice without artificial restrictions on their scope.	10/25/24 5:39 pm CommentID:228409
Marie Homa- Palladino	Support optometry privileges for lasers	<ul style="list-style-type: none"> • Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. • in-office lasers have been performed by optometrists since the 1990s 	10/25/24 5:43 pm CommentID:228410 P094

- Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases.
It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists.

Marie Homa-Palladino

Ophthalmologist

OD Laser Eye Surgery Bill a frightening disservice to the citizens of VA!
VOTE NO!!
SAVE SIGHT!!

As an American Board of Ophthalmology(ABO) certified Ophthalmologist, allowing individuals who have never gone to Medical School to perform LASER eye surgery without training and having used only a model eye is malpractice and a disservice to the citizens of Virginia! The Journal of the American Medical Association published 2 articles 2021 and 2024 stating that patients seen by allied professionals " ODs, PAs and NPs" MUST have alternating visits with MDs, ie they are not qualified to function without direct medical supervision, is below the standard of care. The OD is not required to have a college degree and Optometry school is in NO WAY COMPARABLE to Medical School. Ophthalmologists complete 12 to 13 years of training and are required to pass a series of rigorous exams for Board Certification. Only the Ophthalmology Boards are certified by the American College of Graduate Medical Education (ACGME). The Optometry " Board" certification cannot qualify for ACGME certification because of the paucity of skills and training received in their limited 6 year education that does not include surgical or hospital rotations!

You have only one pair of eyes! There are no eye transplants. Why would you trust the gift of sight to self proclaimed "surgeons" WITHOUT ACGME Board Certification???

PLEASE DO NOT ALLOW WANNABE OD "SURGEONS" to lower the standards of medicine and endanger the sight of generations of Virginians!! If they want to be EYE Physicians and Surgeons, the prescribed route is MEDICAL SCHOOL a 12 year commitment!!! Not the OD route. This is not a turf war

10/25/24 5:45 pm
CommentID:228411

		<p>but a reality show that puts the citizens of Virginia at risk!!</p> <p>The recent 2024 JAMA article states that a physician's Board Exam scores correlates with the mortality rates of their patients. ODs have NO OBJECTIVE measurement of their knowledge!!</p> <p>Protect the citizens of Virginia and their sight from ODs who want to overstep Medical School and declare themselves as Laser Eye Surgeons!!! Help!!!</p>	
Brian Miller	Support safe optometry regulations as submitted	<p>Please support the optometry law as presented. The updated law provides patients access to procedures performed by licensed optometry who have passed boards and proven their competency. These procedures are currently being performed in 12 states in a safe and effective manner. As president of the Idaho Optometry Physicians, I would be glad to answer any questions you may have.</p> <p>Respectfully submitted,</p> <p>Brian Miller, O.D.</p> <p>208-215-0519</p>	10/25/24 5:47 pm CommentID:228412
Anonymous	Physicians, not optometrists! Patient safety is more important than money.	<p>why bother going to med school? Should anyone care about quality? If any optometrist can do surgery, than does it matter to have standards? Who will pay when patients have poor outcomes? How many unnecessary procedures will be done?</p>	10/25/24 5:55 pm CommentID:228413
Soheila Rostami, MD	against the ability of optometrist performing laser surgery	<p>I recently learned that the General Assembly and Governor have passed legislation allowing non-surgeons to perform surgical procedures, including a pending decision by the Board of Optometry to permit optometrists to conduct laser eye surgeries after only didactic coursework—without hands-on training. I find this decision deeply troubling, as it appears to prioritize factors other than patient safety and quality of care.</p> <p>As an oculofacial plastic surgeon, I've completed extensive training to reach my current level of expertise. Corneal and retina specialists can attest to this rigorous journey as well. We go through years of training that include 4 years of medical school, a one-year internship, three years of residency, and one to two years of fellowship. In contrast, optometrists complete four years of optometry school and then begin their practice. This considerable difference in training is essential for performing complex procedures safely, including laser surgeries on the eye.</p> <p>The reason we dedicate so many years to this</p>	10/25/24 5:55 pm CommentID:228414

		<p>specialized training is to minimize complications and ensure the highest standard of care. When these qualifications are disregarded in policy decisions, we inevitably face greater risks and complications that impact patient safety.</p> <p>Governor, this raises an important question: Why support residency and fellowship programs at hospitals and medical schools if their training requirements are deemed unnecessary for certain procedures? In Virginia, there are currently 628 ophthalmologists and 1,480 optometrists, a balance that generally aligns with community needs. However, it's troubling that these policies might now allow those with less training to perform procedures that should be reserved for fully trained specialists.</p> <p>I would also ask whether, in a personal scenario, the Governor would trust a recent optometry graduate to perform laser surgery on his own eye or that of a family member. Patient safety should be our top priority, and I urge you to reconsider this decision to protect the well-being of our community.</p>	
Marrie Read, OD - American Optometric Association Trustee	Support optometry proposal as submitted	As a Trustee of the American Optometric Association's Board and a licensed optometrist in the Commonwealth of Virginia, I am in full support of the draft legislation, as presented without any changes. Doctors of optometry have safely been performing these procedures since the 1990's, with over 146,000 performed to date. Optometric education, training and certification allows doctors of optometry to safely provide these in office treatment options for their patients and supports the regulation requirements of 2 proctored sessions per procedures. The presented regulations were developed with input from optometry and ophthalmology, therefore should be supported as presented.	10/25/24 5:55 pm CommentID:228415
OmarChaudhary	I know I'd go to an ophthalmologist	If I needed a procedure, I'd want someone who's been trained to do it in a rigorous manner. Lasers can do significant damage if in the wrong hands. If this bill passes, the legislature should the first ones to get experimented on.	10/25/24 6:04 pm CommentID:228416
Asima Bajwa, Champlain Ophthalmology	Optometrist Eye Laser	Ophthalmologist only please	10/25/24 6:08 pm CommentID:228417
AP	Support for laser expansion	Expanding the range of providers capable of performing laser procedures can significantly benefit public health. By increasing access to these services, more individuals can receive timely and necessary care, potentially leading to improved health outcomes and reduced disease burden. This expansion can help alleviate wait times for appointments, especially in areas with healthcare shortages, and provide greater	10/25/24 6:08 pm CommentID:228418

		flexibility for patients in scheduling procedures. I have been seeing my optometrist for years and the burden of having to coordinate transportation and appointments with other doctors in other offices for something she's more than qualified to perform just to perpetuate antiquated limitations is unnecessary.	
Asima Bajwa	Ophthalmologists could perform eye laser placed please	Ophthalmologist ONLY Please	10/25/24 6:11 pm CommentID:228419
Jacquelyn Weber, MD	Concerned for patient safety	I strongly oppose this proposal due to concerns for patient safety in Virginia. Training to use lasers for eye treatments requires extensive time and proctoring, and practicing on a plastic eye model is severely inadequate. Optometrists also do not have adequate experience with ocular procedures, nor surgeries. Allowing laser treatments without this experience puts patients at very high risk for complications, including those which could cause permanent vision loss. Only ophthalmologists (eye <i>surgeons</i> who are trained in medical school and ophthalmology residency over 7+ years) should be permitted to perform such laser treatments.	10/25/24 6:17 pm CommentID:228420
Terri Gossard, OD, MS, American Optometric Association	Support Optometry Regulations as Presented	As a member of the American Optometric Association's Board of Trustees, I full support the draft legislation, as presented without any changes. Doctors of optometry have safely been performing these procedures since the 1990's, with over 146,000 performed to date. Optometric education, training and certification allows doctors of optometry to safely provide these in office treatment options for their patients and supports the regulation requirements of 2 proctored sessions per procedures. The presented regulations were developed with input from optometry and ophthalmology and should be supported as presented.	10/25/24 6:19 pm CommentID:228421
Anna	Support	I have been seeing my optometrist for 15 years and u fully trust in his training and education.	10/25/24 6:23 pm CommentID:228422
Dr James Thimons	Support Optometry porposal as submitted	I am currently a licensed Optometrist in both Connecticut and Virginia and have practiced in Virginia for several years in the past with the intention of returning. I am writing to request your support for the Optometry regulations as presented without any change. Optometrists are currently licensed in 12 states to perform ophthalmic laser procedures and have successfully provided over 146,000 procedures US wide. As a lifelong clinician educator and faculty at 7 Optometric Colleges and Universities I can attest that	10/25/24 6:24 pm CommentID:228423

		<p>educational training provided to the students I train is consistent with the skills necessary to perform the requested procedures as well as the knowledge necessary to appropriately implement these therapies and manage their outcomes.</p>	
Jaime Hazen, O.D., Wyoming Optometric Association	Support quality care to Virginia Patients	<p>Optometrists in Wyoming have been performing these stated procedures for four years. A count done earlier this year has our procedure count in the thousands with zero reported poor outcomes to our state board. Those procedures are those patients would have had to wait extra time, usually weeks if not months, for ophthalmologists to get to.</p> <p>These procedures have been performed by optometrists in differing states since the 1990's. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations as they stand. I encourage you to proceed with no changes.</p>	10/25/24 6:24 pm CommentID:228424
Anonymous	Complete support	<p>The presented regulations were developed with input from optometry and ophthalmology and should be supported as presented.</p> <p>Patient care should be first and foremost, not what feels like a turf war.</p>	10/25/24 6:27 pm CommentID:228425
Ana	Support Optometrist	<p>I support optometrist having the ability to provide a service that is greatly lacking in our community. Optometrist not only have 4 years of training during school, are required to take a laser course during their years of training, but also have the opportunity to have an extra year of training during a Residency. When the law is passed, optometrist will be required to go through training before performing such procedures, we will not perform them without training and going through certificates.</p> <p>That being said, I am in support of Optometrist having the ability to help the community.</p>	10/25/24 6:31 pm CommentID:228426
Anonymous	Safety concerns-terrible idea to legislate against patient safety	<p>Unfortunately, the attempt to use legislation to side step the requisite training and understanding of what laser surgery can do the human body from recovery of intended treatment will allow under qualified individuals to put patient safety at risk. In an age where the automation and AI risks providing oversight, we as citizens, and concerned constituents and professionals need to step up to enforce common sense in care and protection of unsuspecting and vulnerable patients at the time for need of care. The trust patients put on licensed professionals is a "blind" trust that is based on licensure and believing that the legislation protects</p>	10/25/24 6:34 pm CommentID:228427

		<p>patient safety as paramount. We can't abdicate our responsibility because certain lobbying groups try and introduce legislation to side step quality care just to increase their own personal revenue and benefit. Please oppose this legislation!</p> <p>thank you for your consideration.</p>	
Malack Hamade	Against laser proposal as currently written	I have nothing against optometrists and consider the ones I work with dear colleagues. However optometry is not a surgical specialty. When the question of patient safety comes into play advocacy for extended periods of training especially procedural training is absolutely and undoubtedly imperative. Expansion of scope of practice to include laser use without rigorous training in its clinical indications and the proper use of said laser therapy can result in tragic and more importantly preventable unfavorable outcomes. As someone who regularly screens for ROP and treats the most vulnerable of patients, I shudder to think of the slippery slope this will lead to. I believe the current proposal needs a major revision to include direct supervision and training under qualified physicians in real clinical settings. No ands ifs or buts.	10/25/24 6:37 pm CommentID:228428
Michael C Tigani MD	Optometric laser training	I strongly urge every voting member to consider the lack of proper training and supervision that this bill provides proposes. I propose that any optometrist who would like to perform the listed procedures be proctored by an ophthalmologist who has gone through medical school, internship, and ophthalmology residency. Each optometrist should demonstrate competency for at least 50 cases of each separate procedure. The optometrist must also take classes and pass a written test demonstrating their comprehension of contraindications to the laser, complications, mandated post op care, and appropriate times to consult for assistance. Legislators should also re-examine malpractice insurance for this new class of surgical providers; perhaps they too should be subjected to annual premium increases despite claims free histories. I would be happy to be involved in restructuring this document.	10/25/24 6:37 pm CommentID:228429
Medical Society of Northern Virginia	DO NOT ALLOW ODs to lower the standards of laser surgery. VOTE NO!!	Allowing individuals who have never gone to Medical School to perform LASER eye surgery without training and having used only a model eye is malpractice and a disservice to the citizens of Virginia! The Journal of the American Medical Association published 2 articles 2021 and 2024 stating that patients seen by allied professionals "ODs, PAs and NPs" MUST have alternating visits with MDs because they are not qualified to function without direct medical supervision. ODs are not required to have a college degree and Optometry school is in NO WAY COMPARABLE to Medical School. Ophthalmologists complete 12 to 13 years of training and are required to	10/25/24 6:44 pm CommentID:228430

pass a series of rigorous exams for Board Certification. Only the Ophthalmology Boards are certified by the American College of Graduate Medical Education (ACGME). The Optometry “ Board” certification cannot qualify for ACGME certification because of the paucity of skills and training received in their limited 6 year education that does not include surgical or hospital rotations!

DO NOT ALLOW ODs to lower the standards of surgery and endanger the sight of generations of Virginians!!

Protect the citizens of Virginia and their eyes from ODs who want to overstep Medical School and declare themselves Laser Eye Surgeons without proper education and training.

Anonymous

Optometrist laser

Dear Respected Colleague. Optometrists play an important role in being the first stop at eye care. However lasers and surgery should not be performed by them. I have seen far too many patients that have been mismanaged and have lead to devastating loss in vision. For instance, Glaucoma that has been poorly managed. Lack of education given to patients. I have seen patients that have had toxic side affects from medication, again robbing them of their vision. The goal of patient care is patient safety, not about how many procedures can be performed in a state. By allowing optometrist to do lasers when they haven’t had a formal training in what goes behind doing surgery, the potential complications that could arise and also managing those complications if they do arise, will affect quality of care and will lead to devastating consequences. I urge you to refrain from expanding the scope of lasers and surgeries to optometrists so as to prevent sight threatening complications.

Sincerely,

your local Virginia Ophthalmologist

10/25/24 6:44 pm
CommentID:228431

Geoff Hammel

Concern
Regarding Eye
Care Standards

Dear Ms. Moss,

I am writing to you as a concerned citizen of the Commonwealth. I was surprised to learn that our government allows non-surgeons to perform eye surgeries. I am even more concerned that a lower standard of care is expected of optometrists compared to the rigorous requirements placed on ophthalmologists.

Please take all necessary actions to ensure that the

10/25/24 6:44 pm
CommentID:228432

P101

		<p>highest standards of care are maintained. I urge you to require optometrists to undergo the same laser training as ophthalmologists, including live proctored cases, before they are permitted to operate on our eyes.</p> <p>Thank you for your attention to this important issue.</p> <p>Sincerely, Geoff Hammel</p>	
Curtis Ono	Support of Expanded Access for Patients!	As a member of the American Optometric Association's Board of Trustees, I fully support the draft legislation as presented, without changes. Doctors of optometry have safely performed these procedures since the 1990s, with over 146,000 successfully completed to date. Optometric education, training, and certification enable doctors of optometry to safely provide these in-office treatment options, in line with regulatory requirements for two proctored sessions per procedure. The proposed regulations were developed with input from both optometry and other health professions and should be supported as presented.	10/25/24 6:51 pm CommentID:228433
Anonymous	Optometrist	With the proper training Virginia OD can and should be allowed to preform laser surgery!!! New generation with training in the latest technology is beneficial for for patients!	10/25/24 6:52 pm CommentID:228434
Joseph Davidson, MD	Against laser eye surgery without proper training	<p>Laser eye surgery is surgery within the eye. The laser vaporizes whatever tissue is in focus at that instant. Vaporizing tissue is surgery, just like cutting with a scalpel.</p> <p>No one should be allowed to do laser surgery without sufficient training! Surgery is not something you learn from a book. It is a skill that takes practice to learn, and it requires someone already very skilled to supervise (proctor) and save you from making mistakes until you are proficient.</p> <p>No one should be allowed to do surgery without training and practice (supervised) on live patients. The living human eyeball is nothing like a stationary plastic model. The eyeball is the fastest moving object in the body. And it does move, very often, and often without warning. Most patients who need laser eye surgery are older and have multiple other medical problems. They notoriously do not keep their eyes still, even with a laser pointed at them. Breathing, nerve, muscle, and other health problems can make it impossible to even keep their head still.</p> <p>The laser vaporizes whatever is in front of it the instant it fires. If a patient moves, that can be disastrous.</p>	10/25/24 6:53 pm CommentID:228435

		<p>Again, laser eye surgery requires training and practice on LIVE patients with someone very skilled proctoring and ready to save you from screwing up until you are proficient.</p> <p>Optometrists are essential for reaching patients who need eye care. But they are not trained in surgery and cannot learn it from a book and a plastic model</p> <p>Vote against this bill and protect our citizens. Thank you.</p>	
Mary	Full and complete support!!!!	I have so much faith and trust in my optometrist with this procedure. Optometrist are passionate about patient care and this will help so many patients like myself. I would trust my personal optometrist to perform this procedure on me and my loved ones without question! Please put patients first and pass this.	10/25/24 6:55 pm CommentID:228436
Anonymous	Support optometrist and expand patient care	Support optometrist and patient care	10/25/24 6:58 pm CommentID:228437
Anonymous	Protect patients. Oppose	This is not Appropriate. Patient safety compromised .	10/25/24 7:03 pm CommentID:228438
Joseph	Complete support	With the proper training Virginia OD can and should be allowed to preform laser surgery!!! New generation with training in the latest technology is beneficial for patients!	10/25/24 7:04 pm CommentID:228439
Ophthalmology Resident	Laser surgery should be performed by surgeons	<p>While optometrists play a vital role in eye care, it is inappropriate to allow these providers without medical or surgical training to perform laser eye surgery. They lack the extensive training, including diagnosis and management of systemic medical conditions, and are not equipped to manage any complication that may arise with these procedures.</p> <p>I would not recommend any of my family members see a provider who has simply acquired a certification to perform a surgical procedure and has never been supervised in their training on real people. Additionally, it is not ethical to perform surgical procedures on patients for which you cannot manage potential complications, as is the clear case for optometrists. The delay in care and risk of blindness that would occur if a complication were to arise is simply too great.</p> <p>Loss of vision destroys a patient's quality of life. Who would you choose to perform laser on YOUR eyes, an optometrist with a certification and no surgical background or an ophthalmologist with residency</p>	10/25/24 7:10 pm CommentID:228440

		<p>training and skills to handle each case with nuance?</p> <p>I have already seen many patients with significant eye disease who were referred by optometrists to ophthalmologists too late. Please don't take advantage of our patients' lack of awareness to further Optometry's misguided agenda to perform procedures they are not equipped to handle.</p>	
Sarah	Make laser more accessible!	<p>Laser eye surgery was one of the most impactful things in my adult life and making it more accessible to more people is really important.</p> <p>It makes eye care so much easier—patients like me can get treatments closer to home and usually at a lower cost. Plus, since my optometrist already knows my eye health, I can receive all my care in one place, making follow-ups smoother. This change also helps relieve some pressure on specialists, allowing them to focus on more complicated cases. Overall, it's a win for accessibility and affordability in eye care!</p>	10/25/24 7:10 pm CommentID:228441
Anonymous	Opposed to this regulation	I am completely opposed to this as I worry about safety for patients	10/25/24 7:13 pm CommentID:228442
Ophthalmologist	ODs not qualified to do surgery	<p>100 percent of patients believe that surgery should be done by surgeons only.</p> <p>I am shocked that this bill has gotten this far.</p>	10/25/24 7:21 pm CommentID:228443
Anonymous	Oppose	This could greatly harm patients. The proposed optometry training is completely inadequate to perform laser surgery. I oppose this legislation.	10/25/24 7:22 pm CommentID:228444
Gabriella Dudek	Support Optometrists	Doctors of Optometry are qualified and should be allowed to practice to the entire extent of their scope of practice. Patients deserve greater access to care.	10/25/24 7:23 pm CommentID:228445
Anonymous	Support optometry regulations as presented	Please support these regulations as presented. As a residency-trained optometrist working in Virginia, I can attest that optometrists are well trained in ocular disease and are more than capable to preform these procedures. Our training during our four years in optometry school is extensive, including systemic disease, medication management, and ocular care techniques. Optometrists can independently prescribe medications and manage a significant level of ocular disease, including glaucoma, in all 50 states, and can independently perform the laser procedures presented in 11 states. I learned how to perform these procedures during my third year of optometry school, and the presented regulations are adequate to protect the public and expand access to care. Optometrists are trained and capable to preform these procedures and have the clinical experience, training, and certification in place to expand access safely to the public.	10/25/24 7:29 pm CommentID:228446
Sarah Terlesky	Support optometry laser regulation	Expanding the optometric scope to include the use of lasers is a significant step towards enhancing patient care and addressing the growing demand for comprehensive eye health services. Optometrists are	10/25/24 7:30 pm CommentID:228447

		highly trained in diagnosing and managing a wide range of ocular conditions, and incorporating laser procedures into their practice would enable them to provide more immediate and effective treatments for conditions like glaucoma. This expansion would alleviate pressure on ophthalmologists, improve access to care, especially in underserved areas, and allow for a more integrated approach to eye health.	
Anonymous	OPPOSE; Protecting patients, their eyesights and quality of care is of the utmost importance in this	Protecting patients, their eyesights and quality of care is of the utmost importance in this specialized and complex field. MDs/DOs go through years of training including residency, fellowship in a monitored setting to gain the knowledge and skill to perform these specialized procedures. Oppose non MD/DOs performing any corrective eye surgeries.	10/25/24 7:30 pm CommentID:228448
Patient	Training on model eye completely insufficient	<p>Do you want to have someone perform a laser procedure on YOU who has only practiced on a plastic model eye?</p> <p>Optometrists who perform lasers need to be required to have the same training as physicians that perform lasers. This means live proctored teaching sessions, not practice on model eyes. This training is done during a four year residency training program after four years of medical school.</p> <p>It is simply dangerous and misleading. Patients have no idea that the training required by optometrists is different than the training required by ophthalmologists.</p> <p>Now that I know this is happening, I'm going to tell everyone that I know.</p>	10/25/24 7:32 pm CommentID:228449
Ophthalmologist	Residencies for a reason	<p>Laser eye surgery can be beneficial, but if used improperly can be harmful to the eye. I have seen many PCO referrals from optometrists when the vision impairment was actually the optic nerve or even a BRAO. If optometrists over call PCOs in their referrals, I am concerned they will over laser their patients and miss vision threatening or even life threatening diagnoses.</p> <p>if optometrists completed a residency I might be more in favor of expanding their scope into lasers. However, as this is not the current state of affairs I recommend against expanding scope for patient safety.</p>	10/25/24 7:35 pm CommentID:228450
Anonymous	Only surgeons are qualified to do surgery	Only surgeons are qualified to do surgery. Non-surgically trained doctor such as optometrist should not be allowed to perform surgery. Amount many other	10/25/24 7:35 pm CommentID:228451 P105

		reasons, if the laser surgery goes wrong, optometrist will not have the abilities to manage the complications, therefore this is not safe for the patients.	
Matthew Scott, OD	Support in-office lasers by doctors of optometry	I am writing in support of the proposed draft regulations for optometrists to perform laser procedures in office. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. I currently practice in rural Colorado and have safely performed hundreds of laser procedure in my office, giving my patients access to this care without additional travel or financial burdens to them or their families.	10/25/24 7:36 pm CommentID:228452
Sean Smolenyak	LASER LAW IS PERFECTLY FINE AS PASSED	<p>The legislation that was passed is perfectly fine as written and should be implemented in a timely manner. Please realize the "training" that ophthalmologists claim is so sacred is actually quite limited when it comes to these benign laser procedures. In fact, during their own training programs they are only required to perform a handful of these same procedures before being allowed to perform them without supervision.</p> <p>In addition, optometrists have been performing these laser procedures in over 10 other states without any reported negative outcomes or increase in malpractice insurance for decades.</p> <p>Do not fall for the false fears created by a medical community that wants to control everything, reduce access and drive-up costs.</p> <p>Thank you.</p>	10/25/24 7:39 pm CommentID:228453
TP (patient)	Support!	My optometrist is wonderful and when I had to have a laser for my risk for glaucoma, I asked her to do it. She explained to me that she was not allowed to and referred me to an ophthalmologist. This doctor did not know me and barely knew my history. I did not like our interaction as it was very transactional and I would much rather trust someone who has been protecting and restoring my vision for years vs someone who just sees me as a quick case. The laser was more of a procedure vs any surgery. It was in office and I know my optometrist would have done just as good of a job. I support this bill for the comfort and access of patients not for the surgeons to think I'm not important enough of a patient as their high paying cataract or LASIK patients.	10/25/24 7:40 pm CommentID:228454
Sangeeta Srivastava	Regulations for laser surgery	I vehemently oppose this regulation	10/25/24 7:41 pm CommentID:228455
Retina Specialist	Oppose	<p>Dear Ms. Moss:</p> <p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft</p>	10/25/24 7:41 pm CommentID:228456

regulations regarding proctoring for those individuals seeking certification for laser eye surgery.

As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.

There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.

This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

As a retina surgeon and a professor at a teaching institution, I know very well the amount of training required to competently and safely perform lasers. Using an eye model is completely ridiculous and endangers our patients. I have seen enough misdiagnoses and mismanaged patients from optometrists, that I truly fear for our patients with these legislative changes. Please protect our patients!

Sincerely,

Retina Specialist

Courtney Thelen	Support in-office lasers by doctors of optometry	I support Virginia doctors of optometry performing specific laser procedures in office. Optometrists have been fully trained and are fully capable of safely and effectively performing these procedures. In fact, optometrists have been performing these procedures across the country for years very safely.	10/25/24 7:41 pm CommentID:228457
Kesha Patel	For Optometrist	Optometrists are highly skilled professionals with extensive training in their field. To better serve their patients, they should have the opportunity to expand	10/25/24 7:42 pm CommentID:228458 P107

		<p>their scope of practice. Enabling optometrists to utilize lasers in their practices, after rigorous training and certification, can lead to several benefits:</p> <ul style="list-style-type: none"> • Improved patient care: Patients can receive immediate and effective treatment, reducing wait times and healthcare costs. • Enhanced efficiency: Optometrists can offer a wider range of services, streamlining the patient experience. <p>By empowering optometrists with advanced tools, we can ultimately enhance patient outcomes and optimize healthcare delivery.</p>	
G. Branch	Support optometry proposal as submitted	Optometrists have been trained and educated to perform these procedures and should be allowed to. Limiting optometrists scope of practice limits patients access to care.	10/25/24 7:42 pm CommentID:228459
ophthalmologist	Support In Person Training for Optometrists	<p>This concern is about proper training NOT who is performing the laser surgery. The Virginia legislature should ensure the health of its citizens by ensuring that anyone performing laser surgery is properly trained. Why would someone performing surgery not want to have in-person training? As physicians and surgeons, we receive in-person proctoring. Why should not optometrists receive the same? I support the VSEPS position. The VSEPS encourages the Board to hearken back to its mission statement and tighten standards of approval to require in-person proctoring in all cases.</p>	10/25/24 7:44 pm CommentID:228460
Wynston Akers, OD	Optometrists are educated, trained and certified to perform the procedures outlined	Optometrists have been performing in office laser procedures in other states since the 1990s. 12 states include in-office laser procedures, including bordering states. All optometrists that perform in office laser procedures must pass a national certification exam along hands-on training. Optometrists performing this procedure will allow the citizens of the commonwealth to have shorter wait times to have the procedure, continuity of care having the procedure done by their primary eye care provider and the patients will not have to travel as far to have the procedure done. Please consider these factors amongst many more when considering your decision. Optometry schools across the nation dedicate their time and include in their curriculum for our ability to be trained into these procedures. It would be an injustice to not allow us to not practice to our fullest scope of practice.	10/25/24 7:45 pm CommentID:228461
Christina Dixon	SupportOptometry laser regs	Please continue to support the laser regulations for Virginia as they stand. They were already approved by	10/25/24 7:46 pm CommentID:228462

input from optometry and ophthalmology. We do not need to re-invent the wheel on this issue. Optometrists have already been very successful in using lasers in 12 other states. There is absolutely no reason to trust the education and certification of optometrists in using lasers in the great state of Virginia. It is prudent and appropriate to recognize the successful education and continued training of Optometrists.

Eugene P Russo
MD

Do not allow opticians to perform laser surgery

Allowing individuals who have never gone to Medical School to perform LASER eye surgery without training and having used only a model eye is malpractice and a disservice to the citizens of Virginia! The Journal of the American Medical Association published 2 articles 2021 and 2024 stating that patients seen by allied professionals “ODs, PAs and NPs” MUST have alternating visits with MDs because they are not qualified to function without direct medical supervision. ODs are not required to have a college degree and Optometry school is in NO WAY COMPARABLE to Medical School. Ophthalmologists complete 12 to 13 years of training and are required to pass a series of rigorous exams for Board Certification. Only the Ophthalmology Boards are certified by the American College of Graduate Medical Education (ACGME). The Optometry “ Board” certification cannot qualify for ACGME certification because of the paucity of skills and training received in their limited 6 year education that does not include surgical or hospital rotations!

DO NOT ALLOW ODs to lower the standards of surgery and endanger the sight of generations of Virginians!!

Protect the citizens of Virginia and their eyes from ODs who want to overstep Medical School and declare themselves Laser Eye Surgeons without proper education and necessary training.

10/25/24 7:46 pm
CommentID:228463

GMA

Against

Dear Ms. Moss,

I am reaching out as an American Board of Ophthalmology (ABO) certified ophthalmologist with deep concerns about the potential for optometrists, without medical school or surgical training, to perform laser eye procedures.

Ophthalmologists complete 12-13 years of rigorous training, including medical school, surgical rotations, and board certification through ACGME-accredited exams. Optometrists, however, follow a different pathway without these qualifications. Their limited six-year training and certification do not meet ACGME standards and lack the comprehensive surgical

10/25/24 7:47 pm
CommentID:228464

experience required for safe, high-standard care.

Recent studies in the Journal of the American Medical Association (2021, 2024) emphasize that allied professionals like optometrists require MD oversight for patient safety, underscoring that their training does not qualify them to perform procedures independently. Given that a physician's board exam scores have been linked to patient outcomes, allowing optometrists to perform laser surgery risks lowering our state's standard of care.

Laser eye surgery is a serious procedure, **and we owe it to Virginians to ensure only fully qualified providers are performing it.** Please help protect our community's vision by keeping laser eye procedures within the hands of properly trained ophthalmologists.

Thank you for your consideration.

Lori Butler	Support optometry laser regulations as submitted	<ul style="list-style-type: none">• Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented	10/25/24 7:47 pm CommentID:228465
Anonymous	Support for optometry	<p>12 states include in-office laser procedures by optometrists</p> <p>More than 146,000 procedures have been performed by optometrists across the country</p> <p>All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.</p> <p>There are not enough ophthalmologist to adequately support the patient demands</p>	10/25/24 7:49 pm CommentID:228466
Anonymous	Oppose - Laser not appropriate without appropriate training	<p>The proposed certification lacks the proper training and supervision to insure patient safety. Laser is a surgical procedure and as such the teaching and supervision need to be done with experienced physicians. The outlined education is very inadequate to insure patient safety. There are always 2 part to surgery: first the understanding of the procedure, testing of knowledge and understanding the risks and complications, second the physical skills. The optometrists must take classes, pass a written exam and demonstrate knowledge of the contraindications, complications, and appropriate post op care. The optometrist need direct supervision of more than 50 cases. This is significantly less that ophthalmologist are required. I have been doing laser treatment for glaucoma and cataracts for more than 30 years and this is not a skill easily performed.</p>	10/25/24 7:49 pm CommentID:228467

Anonymous	Support optometry regulations as presented	Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.	10/25/24 7:50 pm CommentID:228468
M Briggs Bauman	Support in-office laser by Doctors Of Optometry	I support the draft regulations as presented. In-office lasers have been performed by optometrists since the 1990s.	10/25/24 7:51 pm CommentID:228469
Molly McNally, OD	Support optometry regulations as presented	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. I personally have performed laser procedures on real patients as a part of my education at Southern College of Optometry.	10/25/24 7:51 pm CommentID:228470
Nickolas clark	Support in-office lasers by doctors of optometry	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. 12 states include in-office laser procedures by optometrists. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.	10/25/24 7:51 pm CommentID:228471
William Waldron, OD	Support optometry regulations as presented	<p>Laser procedures have been performed by optometrists since the 1990s. Optometrists must be certified before performing laser procedures on patients. Certification requires extensive clinical experience, hands-on training, and passing a national certification exam.</p> <p>Draft regulations as presented were developed with input from optometry and ophthalmology, and should be supported.</p>	10/25/24 7:51 pm CommentID:228472
Vivek Jain, MD	Didactic and live proctoring	<p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.</p>	10/25/24 7:52 pm CommentID:228473

		<p>There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.</p>	
Wayne Tan, OD	Support optometry proposal as submitted	Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.	10/25/24 7:52 pm CommentID:228474
Dr. J. M. Athelli, Optometrist	Please support the laser regulations as submitted	Please support the draft regulations without any alterations. Our education and training supports the regulation requirements. Thank you.	10/25/24 7:52 pm CommentID:228475
Bhoomi Patel, OD	Lasers	Support proposal as presented	10/25/24 7:53 pm CommentID:228476
Anonymous	OPPOSED	<p>Dear Ms. Moss,</p> <p>I am reaching out as an American Board of Ophthalmology (ABO) certified ophthalmologist with deep concerns about the potential for optometrists, without medical school or surgical training, to perform laser eye procedures.</p> <p>Ophthalmologists complete 12-13 years of rigorous training, including medical school, surgical rotations, and board certification through ACGME-accredited exams. Optometrists, however, follow a different pathway without these qualifications. Their limited six-year training and certification do not meet ACGME standards and lack the comprehensive surgical experience required for safe, high-standard care.</p> <p>Recent studies in the Journal of the American Medical</p>	10/25/24 7:53 pm CommentID:228477

		<p>Association (2021, 2024) emphasize that allied professionals like optometrists require MD oversight for patient safety, underscoring that their training does not qualify them to perform procedures independently. Given that a physician's board exam scores have been linked to patient outcomes, allowing optometrists to perform laser surgery risks lowering our state's standard of care.</p> <p>Laser eye surgery is a serious procedure, and we owe it to Virginians to ensure only fully qualified providers are performing it. Please help protect our community's vision by keeping laser eye procedures within the hands of properly trained ophthalmologists.</p> <p>Thank you for your consideration</p>	
Madison Chisom, OD Student Doctor	Complete Support for Bill as Written!	I am in complete support of the bill as written. Optometrists receive extensive training on these laser procedures. In rural areas where access to an ophthalmologist may be difficult, giving patients greater access to the same quality standard of care is important. Allowing OD's to perform these procedures, ones that they have been thoroughly trained and prepared for, allows us to achieve our greatest goal: providing our patients with gold standard care. This bill will improve access for patients. VOTE YES!	10/25/24 7:53 pm CommentID:228478
Aaron Deese OD	Support optometry proposal as submitted	As a recent graduate of a college of optometry I feel it is only appropriate that the state of Virginia allows doctors of optometry to practice to the full scope of their education. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. The draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. This is a step forward for all in the eye care community. This is how we better serve our patients and continue to move eye care forward.	10/25/24 7:54 pm CommentID:228479
Neal Pithwa OD	Support laser regulations	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented.	10/25/24 7:55 pm CommentID:228480
Anonymous	Laser not appropriate	<p>Oppose - Laser not appropriate without appropriate training</p> <p>The proposed certification lacks the proper training and supervision to insure patient safety. Laser is a surgical procedure and as such the teaching and supervision need to be done with experienced physicians. The outlined education is very inadequate to insure patient safety. There are always 2 part to surgery: first the understanding of the procedure, testing of knowledge and understanding the risks and complications, second the physical skills. The optometrists must take classes, pass a written exam and demonstrate knowledge of the contraindications,</p>	10/25/24 7:55 pm CommentID:228481

		<p>complications, and appropriate post op care. The optometrist need direct supervision of more than 50 cases. This is significantly less that ophthalmologist are required. I have been doing laser treatment for glaucoma and cataracts for more than 30 years and this is not a skill easily performed.</p>	
Andrew Pissetzner	Support in-office lasers by Doctors of Optometry	<p>Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor. Therefore, please pass the Virginia state regulations to allow optometrists to perform safe laser procedures. This would provide the upmost quality care for patients across the state.</p>	10/25/24 7:55 pm CommentID:228482
Carl S Partain, OD	Optometrists using YAG Laser for after cataract. Treatment.	<p>Training, proper supervision and equipment. This innovation should be left as law. Training, Anatomy, and a use of instrumentation has been proven. Doctors of Ophthalmology are opposing this rule because of competition from Optometry.</p> <p>No that is Zero, harm has resulted from Doctors of Optometry using YAG laser, either in irginia, or any other states where optometrists use laser. I hope you research the facts.</p> <p>Carl S Partain OD</p>	10/25/24 7:57 pm CommentID:228483
Kelly Faulkner, OD	Support in office lasers by Doctors of Optometry	<p>Optometrists are educated, trained, and certified to perform the procedures outlined in the regulations. I support draft regulations as presented without any changes.</p>	10/25/24 7:57 pm CommentID:228484
Anonymous	Oppose	<p>Oppose- MD that has seen complications (as a second opinion) associated with the performance of lasers with inadequate training</p>	10/25/24 7:57 pm CommentID:228485
Anonymous	Not trained	<p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).</p> <p>I am shocked and disappointed that our government</p>	10/25/24 7:58 pm CommentID:228486

		<p>would make such a decision regarding our health and safety.</p> <p>Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p>	
Tori Pierce, OD	Support optometry regulations as presented	I am writing in support of the proposed draft regulations for optometrists to perform laser procedures. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations, which were developed with input from optometry and ophthalmology and should be supported as presented. Certification includes extensive clinical experience, complete hands-on training and passing a national certification exam. More than 146,000 procedures have been performed by optometrists across the country and limiting optometrists scope of practice in VA only limits patients access to care.	10/25/24 7:59 pm CommentID:228487
Rebecca Bumgardner-Diaz, OD	Support Optometry proposal as submitted	I am writing in support of the optometry proposal as submitted without any changes. Optometric education and training supports the regulation requirements of 2 proctored sessions per procedure. There are currently 12 states that allow in-office laser procedures by optometrists and more than 146,000 procedures have been performed by optometrists across the country to date. Virginia, as other states, has almost twice the number of optometrists than ophthalmologist, making access to these procedures less burdensome to the working poor. All optometrists must become certified with hands-on training and pass a national certification examination before performing these laser procedures on patients.	10/25/24 8:00 pm CommentID:228488
Anonymous	OPPOSED- PT SAFETY CONCERN	those with inadequate training should not be performing laser surgery on patients eyes. There are easily accessible ophthalmologists in Virginia who DO have the proper training so that patients are not treated as guinea pigs.	10/25/24 8:02 pm CommentID:228489
Laura Valero, FNP-C	Lasers	Given the relative lack of ophthalmologists in Virginia compared with optometrists, combined with optometrists' robust education levels including continuing education, it makes no sense to delay the laser measure. Doing so would significantly increase the burden on Virginians who need this vital treatment modality. Further, it would significantly increase the existing delay of care for procedures that must be performed by ophthalmologists such as cataract surgery. By the time I was able to get in with ophthalmology for my rapidly progressing cataracts (within 3 months of diagnosis, my eye sight was	10/25/24 8:04 pm CommentID:228490

		20/100 in one eye and 20/40 in the other), I was to the point of having to stop driving altogether. If I had to wait any longer because my ophthalmologist was busy with laser procedures that optometrists could not do, I would have had to quit work due to inability to drive as well as difficulty with managing our electronic medical record system. As it was, it took 5 months to go through the process to have surgery.	
Summer Sayers	Support optometry regulations as presented	<p>To whom it may concern,</p> <p>I recommend you all support draft regulations as presented without any changes. The regulations were developed with input from optometry and ophthalmology and should be supported as presented. Optometrists are educated, trained, and certified to perform the procedures outlined in the regulations. Along with this, In-office lasers have been performed by optometrists since the 1990s and More than 146,000 procedures have been performed by optometrists across the country. Also, this is helping care for more of our patients in Virginia. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor and in rural areas.</p> <p>All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. Thank you.</p>	10/25/24 8:06 pm CommentID:228491
Kimberly Mistiszyn, OD	Support optometry proposal as submitted	I am a current practicing Virginia optometrist and truly believe supporting this proposal will allow more accessible care to our patients as there are almost 2x more optometrists in Virginia than ophthalmologists, lifting the burden to the working poor. Optometrists have been performing these procedures since the 1990's and 12 other states include in office laser procedures by optometrists. Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure. The draft regulations as presented were developed with input from both optometry and ophthalmology and should be supported as presented.	10/25/24 8:07 pm CommentID:228492
Eunice Hwang, OD	Support optometry regulations as presented	Optometrists are thoroughly educated, intensely trained, and certified to perform the procedures outlined in the regulations and I support the draft regulations as presented without any changes for optometrists in Virginia.	10/25/24 8:09 pm CommentID:228493
Anonymous	Lasers	Lasers	10/25/24 8:09 pm CommentID:228494
Sangeeta Chitlu, MD	Opposed	Opposed - pt safety concerns!	10/25/24 8:10 pm CommentID:228495
Optometrist	Support Optometry Proposal As	I believe that it is imperative that proposed regulations be supported to increase access to Laser therapies all across the state, but especially in rural areas where	10/25/24 8:10 pm CommentID:228496 P116

	Submitted	health care is limited. Twelve other states have already adopted in-office laser procedures by optometrists, without incident. In addition, the current draft of regulations was developed with input from both optometry and ophthalmology and should be approved as presented.	
Betsy Lobaugh	lasers for optometrists	support optometry regulations as presented support laser regulations support in-office lasers by doctors of optometry	10/25/24 8:10 pm CommentID:228497
Leah Ramos Swatts, OD	Support in-office lasers by Doctors of Optometry	I am writing to express my strong support for the draft regulations permitting optometrists in Virginia to perform in-office laser procedures. I urge the adoption of these regulations as presented without any changes. These regulations were thoughtfully developed with input from both optometry and ophthalmology professionals, ensuring a balanced and comprehensive approach to patient care. Optometrists are highly educated, trained, and certified to perform the procedures outlined. They also engage in continuing education to enhance their scope of practice, which is a common and essential aspect of medical professions. Allowing optometrists to perform these procedures will significantly improve access to essential eye care services, especially for the working poor and underserved communities. It reduces the burden of travel and wait times, ensuring timely treatment. Supporting these regulations empowers optometrists to utilize their full training and expertise for the benefit of patients across Virginia. I strongly encourage the approval of the draft regulations as they stand.	10/25/24 8:11 pm CommentID:228498
Fadee Bittar, SEEN Family EyeCare	Support in-office lasers by doctors of optometry	I fully Support the draft regulations as presented without any changes. As doctors of Optometry, we are educated, trained and certified to perform the procedures outlined in the regulations. More than 146,000 procedures have been performed by optometrists across the country. Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. And lasers are essential for the treatment of such diseases. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the public. I believe All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. It is vital that you support the draft regulations for laser procedures in the field of optometry in the great state of Virginia. Thank you for your time.	10/25/24 8:12 pm CommentID:228499
Anonymous	Optometry Laser Regulations	Please do not delay in passing this important legislation. I trust my optometrist and other clinicians to provide treatment that is appropriate to my condition.	10/25/24 8:12 pm CommentID:228500
			P117

Casey Madden	Non concur with optometrists performing surgery	I do not support optometrists unnecessarily performing surgery. Ophthalmologists extensively train for this responsibility.	10/25/24 8:12 pm CommentID:228501
Arthi Venkat, MD	OPPOSED	<p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you</p> <p>today to express my deep concern regarding the particular section in the draft</p> <p>regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I</p> <p>strongly recommend amending the draft regulations to reflect a proctoring process that</p> <p>requires both didactic and live proctored cases, whether or not a plastic model is</p> <p>involved. Currently, the draft regulations are written so that proctoring can be done on a</p> <p>model eye or on a live patient, and in some cases proctoring is not even required.</p> <p>There is a wide spread list of physiological issues that can affect individuals' ability to</p> <p>remain still during a laser eye surgery procedure. Some examples of these varying</p> <p>factors can include, but are not limited to, tremors, anxiety, or breathing movements</p> <p>particularly for obese patients. The smallest movement of the patient's eye, even a</p> <p>centimeter, can result in dangerous and detrimental outcomes for the patient because</p> <p>laser eye surgery treatment is measured in the sphere of microns.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care</p> <p>is provided throughout the Commonwealth. I strongly hope you will consider this change</p> <p>to the draft regulations to ensure optometrists across the state are trained to the highest</p>	10/25/24 8:12 pm CommentID:228502

		standard.	
Laura Li Thoi	Support optometry proposal as submitted	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.	10/25/24 8:13 pm CommentID:228503
Oswaldo Diaz, OD	Support laser regulations	I am writing to support laser regulations as they were presented without any changes. The draft regulations were developed with input from both optometry and ophthalmology and should be supported as presented. In-office lasers have been performed by optometrists across the USA since the 1990's and currently 12 states have optometrists performing these procedures. There are almost double the amount of optometrists in the state of Virginia as ophthalmologists, thus if the regulations are passed, making access to theses procedures much less burdensome for the working poor.	10/25/24 8:13 pm CommentID:228504
Bill Damron	Support Optometry Using Lasers: The Economically Disadvantaged Have Inadequate Access	<i>I support optometrists use of laser in office. Twelve states already allow laser procedures to be performed by optometrists. I practice in a heavily based minority and economically challenged area where patients have very little access to care, yet have an extremely high percentage of eye disease, especially glaucoma. In particular, one of the laser procedures that optometrists will soon be allowed to perform, is a very simple and safe procedure that will dramatically help glaucoma patients, and prevent blindness. Many of these same patients, cannot afford their glaucoma medications, or they have other challenges that prevent them from being compliant taking their daily medication for glaucoma treatment. Optometrists have spent many hours training to do these simple and safe laser procedures and are ready to join the thousands of optometrists nationwide who are already doing them with a high level of success.</i> Respectfully, William Damron OD. Portsmouth, VA	10/25/24 8:13 pm CommentID:228505
RAG	OPPOSE	Dear Ms. Moss, I am reaching out as an American Board of Ophthalmology (ABO) certified ophthalmologist with deep concerns about the potential for optometrists, without medical school or surgical training, to perform laser eye procedures. Ophthalmologists complete 12-13 years of rigorous training, including medical school, surgical rotations, and board certification through ACGME-accredited exams. Optometrists, however, follow a different pathway without these qualifications. Their limited six-	10/25/24 8:13 pm CommentID:228506

year training and certification do not meet ACGME standards and lack the comprehensive surgical experience required for safe, high-standard care.

Recent studies in the Journal of the American Medical Association (2021, 2024) emphasize that allied professionals like optometrists require MD oversight for patient safety, underscoring that their training does not qualify them to perform procedures independently. Given that a physician's board exam scores have been linked to patient outcomes, allowing optometrists to perform laser surgery risks lowering our state's standard of care.

Laser eye surgery is a serious procedure, **and we owe it to Virginians to ensure only fully qualified providers are performing it.** Please help protect our community's vision by keeping laser eye procedures within the hands of properly trained ophthalmologists.

Thank you for your consideration

Dr. Gina Dyd-Schmid

Support Doctors of Optometry proposed laser regulations

- Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.
- All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam

10/25/24 8:15 pm
CommentID:228507

Anonymous

optho

Dear Ms. Moss:

I am writing you as a concerned citizen in the Commonwealth. I just learned that the

General Assembly and Governor passed a law allowing non-surgeons to operate, and

that the Board of Optometry is about to allow non-surgeons to perform laser surgeries

on eyes after no hands-on training (didactic coursework only).

I am shocked and disappointed that our government would take our health and safety

so flippantly.

Please do everything you can to ensure the highest standards of care possible in the

10/25/24 8:16 pm
CommentID:228508

		<p>Commonwealth. If we have to endure this unfortunate law, please make the regulations</p> <p>as close as possible to the actual surgeons' requirements, such as requiring all</p> <p>optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>Sincerely,</p> <p>David</p>	
Anonymous	Oppose - laser on humans requires supervised training in medical school	<p>From an ophthalmologist who completed 10 years of training. Laser is referring to a broad category of technology that can be applied to so many different procedures. Each has their own nuance, risks, complications and benefits. It is far easier to harm with a laser than it is to help. Even in experienced hands a straightforward laser procedure can cause permanent complications. The decision to let providers who have not had direct training learning to avoid these issues or deal with the complications is not taking these risks seriously. We discuss risks not because they may happen, but because if you do enough procedures they will happen. I don't believe that one can learn the intricacies of these procedures without completing a formalized residency on real patients with supervising attendings with exposure to the post operative complications. In medicine we believe in first do no harm. Giving widespread access to laser to people who are not adequately trained is against that tenant.</p>	10/25/24 8:16 pm CommentID:228509
John W. Dresely, Jr., OD	Support optometry proposal as submitted	<p>Please support the regulations for optometric use of lasers as presented. As an optometrist with over 35 years of experience I have taken many continuing education courses. I took the course that was presented by an accredited school of optometry. Currently 12 states allow optometrists to use lasers and over 145,000 procedures have been done.</p> <p>The draft regulations were created with input from both optometry and ophthalmology. Please support these regulations as presented as they include proctored training sessions.</p> <p>Thank you.</p>	10/25/24 8:16 pm CommentID:228510
Dora Adamopoulos	Support optometry proposal as submitted	<p>I am writing to express my full support for the current draft regulations without any modifications.</p> <p>The proposed regulations have been thoughtfully developed, incorporating input from a regulatory advisory panel that included optometry and</p>	10/25/24 8:17 pm CommentID:228511

		ophthalmology field representatives.	
Gene Sweetnam	Support the Optometry Regulations as submitted	<p>Optometrists have performed certain laser procedures since 1990. 12 States allow Optometrists to perform laser procedures with over 145000 completed. Optometrists have the education and training for this.</p> <p>We need to increase access to care and stop long wait times for patients to get these treatments its about access to care.</p>	10/25/24 8:19 pm CommentID:228512
Ken Westcott	Support in-office lasers by doctors of optometry	<p>I want to register my support of the Optometrist use of laser regulations as presented without any changes. These draft regulations were developed with input from optometry and ophthalmology. There are 12 other states that already allow doctors of optometry to treat patients with laser instruments. Doctors of optometry already have over 10,000 hours of training in the diagnosis and treat glaucoma, cataracts, and other ocular diseases. Additionally, optometrists are required to have additional extensive clinical experience, complete hands-on training, and pass a national certification to become certified in laser procedures before performing them on patients. Many Virginia optometrists have already had training in the use of in-office lasers. This will increase the access and the ability of citizens of Virginia to get needed ocular health care, particularly in remote and rural areas of the Commonwealth.</p>	10/25/24 8:19 pm CommentID:228513
Fellowship-trained ophthalmologist	OPPOSED - patient safety concern	<p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.</p> <p>There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient</p>	10/25/24 8:24 pm CommentID:228514

		<p>because laser eye surgery treatment is measured in the sphere of microns.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.</p>	
Alexandra Schwab	Support in-office lasers by doctors of optometry	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. 12 states include in-office laser procedures by optometrists and more than 146,000 procedures have been performed by optometrists across the country. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working people.	10/25/24 8:25 pm CommentID:228515
Mallory Kuchem, OD	Support optometry regs	I support the laser regulations as proposed. Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure. 12 states already include in-office laser procedures by optometrists and Virginia should be among them. More than 146,000 procedures have been performed by optometrists across the country and this is not new - it's been happening in other states since the 90's!	10/25/24 8:25 pm CommentID:228516
Kim Ho, OD	Support in-office lasers by doctors of optometry	Support draft regulations as presented without any changes	10/25/24 8:26 pm CommentID:228517
Theodore Wu, MD, PhD	Strongly Opposed	<p>To whom it may concern, As a board certified ophthalmologist for 21 years, I strongly oppose this proposal. Performing laser surgery is part of a comprehensive training program which includes 4 years of medical school and four years of ophthalmology residency. There are no safe shortcuts. An optometrist who seems to perform these procedures must go to medical school for an MD and four years of ophthalmology residency to fully understand the use of these lasers in the treatment of eye diseases such as glaucoma. Thank you for your time.</p> <p>Theodore Wu, MD, PhD.</p>	10/25/24 8:27 pm CommentID:228518
Elena Byrnes	Support in-office lasers by doctors of optometry	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations and this would provide an important cost effective service to many patients. Support draft regulation as presented without any changes.	10/25/24 8:28 pm CommentID:228519
MDH	Opposed	This is really irresponsible. Optometrists are exceptional at certain things, but they do not have the training and skill set for surgery. We should not allow this.	10/25/24 8:29 pm CommentID:228520
Megan M Moore, OD	Support in-office lasers by doctors	Optometrists must be certified in laser procedures before performing them on patients. To be certified,	10/25/24 8:30 pm CommentID:228521

of optometry

optometrists must have extensive clinical experience, complete hands-on training, and pass a national certification exam. The state of VA has twice as many optometrists as ophthalmologists, making access to these procedures far less burdensome to all its citizens. Twelve other states have already included in-office laser procedures by optometrists.

Ophthalmologist

YAG complications range from 1 in 200 to 1 in 5000

What are the Possible Complications and Side Effects of YAG Capsulotomy?

10/25/24 8:31 pm
CommentID:228522

YAG laser capsulotomy is a highly successful procedure with a very low risk of complications. Floaters are a common side effect after YAG capsulotomy but should settle steadily after the treatment.

The possible complications are:

- Retinal tear. It is normal and common to get floaters after YAG capsulotomy, and these can take several weeks or even months to settle down. But if you develop lots of little black floaters, or lots of flashing lights it is possible that you have a retinal tear. This requires laser treatment to minimise the risk of a retinal detachment. If you develop a shadow or curtain in your vision it is possible that you are developing a retinal detachment. If you have any of these symptoms, please contact me or the Sussex Eye Hospital casualty urgently. The risk of retinal tear or retinal detachment after YAG capsulotomy is extremely low but is higher in people who have had previous retinal tears or detachments and in people who are very short sighted (myopic), in whom it may be around 1%.
- Inflammation (approximately 1 in 200 people) and/or high pressure in the eye (less than 1:500): if you develop increasing pain, light sensitivity, reduced vision or redness of the eye, please contact me or the eye casualty at the Sussex Eye Hospital urgently. The risk of inflammation after YAG capsulotomy is around 1 in 200 people and of high pressure, probably less than 1:500.
- Damage to the intra-ocular lens from the laser, affecting the clarity of the lens. This complication can occur when the laser practitioner is inexperienced but is extremely unlikely if the procedure is being done by someone who has performed this procedure many

		<p>times before.</p> <ul style="list-style-type: none"> • Cystoid macular oedema. This is fluid leakage or swelling of an area of the retina at the back of the eye and can cause the vision to become a bit cloudy. It generally settles without intervention or with eye drops, but very occasionally requires an injection in the eye. The risk thought to be significantly less than 1:100 people. <p>The overall risk of visual loss from YAG capsulotomy is around 1 in 5000 procedures.</p>	
Anonymous	Concern	<p>Dear Ms. Moss:</p> <p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).</p> <p>I am shocked and disappointed that our government would take our health and safety so flippantly.</p> <p>Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>Sincerely,</p>	10/25/24 8:32 pm CommentID:228523
Anonymous	Support for use of laser	<p>I am in support of this practice. As long as the training is solid, there is no reason why this procedure cannot be performed. Over the last 3 years, I have worked with 3 Optometrists who were all very intelligent and very capable of performing laser surgery. With all of the access to medical care problems we currently face, I do not see the harm in Optometrists performing this procedure.</p>	10/25/24 8:32 pm CommentID:228524
Adriana Medina	Support optometry proposal as submitted	<p>Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. In-office lasers have been performed by optometrists since the 1990s. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.</p>	10/25/24 8:34 pm CommentID:228525
Anonymous	Ensuring Patient Safety and Quality Standards in Laser Eye Surgery Proctoring	<p>Dear Ms. Moss:</p> <p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye</p>	10/25/24 8:34 pm CommentID:228526

surgery.
 As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required. There is a wide spread list of physiological issues that can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns. This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.

Anonymous	Support Optometry laser laws. It is the right thing to do.	I want to lend my support to The optometric laser law. This law can only help the general public and citizens of our great state. The three laser procedures that were granted under the scope of practice in Optometry will help the public to accessibility and delivering of quality care. There is definitely a backlog of patients in need of laser procedures, delay care and causing citizens to suffer with blurry vision. Continuing the statue that optometrist can deliver laser procedures to the general public, voted on by our legislators, and signed by our governor was transitioning care to those individuals which were competent to do it. 12 other states in the United States are delivering similar care. I urge everyone who is reading or listening to this Townhall to support our past and approved laser law for Optometry. Let's keep the quality of care, high in our state .	10/25/24 8:36 pm CommentID:228527
Amina Azam OD	Support laser procedures by optometrists	Support laser procedures by optometrists	10/25/24 8:36 pm CommentID:228528
Anonymous	Concern with optometrists performing surgery without appropriate	Dear Ms. Moss: I am writing you as a concerned citizen in the Commonwealth. I did not previously know	10/25/24 8:36 pm CommentID:228529 P126

	training	<p>that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet.</p> <p>Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.</p> <p>Sincerely,</p> <p>MR</p>	
Adam Scott Melton, O.D.	Support optometry proposal as submitted	<p>Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented.</p> <p>All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.</p>	10/25/24 8:36 pm CommentID:228530
JER	Opposed	As a potential patient this seems completely irresponsible. Why would we allow non surgeons to do these procedures? This is ludicrous.	10/25/24 8:37 pm CommentID:228531
Ashwynn Halbert, OD	Strongly support Optometry Laser Law as presented	<p>There are 12 states that include in-office laser procedures by optometrists, with optometrists having performed more than 146,000 procedures across the country. Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam! Thank you for your consideration!</p>	10/25/24 8:38 pm CommentID:228532
			P127

Rebecca Meredith	Support in-office lasers by doctors of optometry	I am writing in support of in-office lasers by Optometrists. This will improve access to care for patients and improve compliance in patients who will not follow up with referrals to OMDs or who cannot afford drops. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.	10/25/24 8:38 pm CommentID:228533
Anonymous concerned citizen	Opposed	It is highly concerning to learn that non-surgeons/providers without supervised laser training and completion of a residency would be allowed to perform laser surgeries. We need to place patient safety at the forefront of this discussion to ensure patient safety is not being compromised.	10/25/24 8:39 pm CommentID:228534
Gordon W. Jennings, OD	Support in-office lasers by Doctors of Optometry	Optometrists using lasers is not new. Multiple states already allow optometrists to perform specific laser procedures, allowing local and timely access to care. Optometrists are educated, trained, and certified to perform the procedures outlined in the regulations. As knowledge within the specialty accelerates and grows, health professionals are expected to utilize their skills, knowledge, and training to enhance their scope of services to benefit the communities served.	10/25/24 8:39 pm CommentID:228535
Greg Johnson	Support laser for optometry proposed	Medical Doctors allows Nurse Practitioners and Physicians Assistants (non-doctors) to use lasers on a regular basis. Optometrists are also doctors and optometry schools and professional organizations have offered in-person training for more than a decade. Many optometrists even graduate with residency. additionally, this will allow rural Virginians to have emergency care who are too far from ophthalmologist in emergency cases.	10/25/24 8:41 pm CommentID:228536
William McElroy, KYCO Student	Laser laws in VA	Just like any other surgery, to be laser certified, BOTH optometrists and ophthalmologists must past a rigorous and in depth training before they are free to practice laser surgery. Here at KYCO, myself and other 3rd years have a full year on the different types of laser surgeries and receive training and the proper procedure for doing said surgeries. In Kentucky, optometrists have been able to preform laser surgery since 2011, helping many patients who could not travel hours away to a major city to see an ophthalmologist. Even if they didn't have to travel, the amount of practicing ophthalmologists is dwindling each year, lowering the ability for every person to receive healthcare they need. Are we supposed to just wait till all of ophthalmology is gone before we can do what we were taught in school? Instead of trying to limit the scope of practice we are taught, why don't we instead work together to help our patients see?	10/25/24 8:42 pm CommentID:228537
Emily Hargrave, OD Student	Support laser regulations	I support draft regulations as presented without any changes. We work hard in school to not only focus our	10/25/24 8:42 pm CommentID:228538

		attention on the eye and its anatomy, but also study the use of lasers. We also have multiple rotation sites where we get hands on experience with laser procedures, including Nd:YAG capsulotomies, with licensed practitioners who have performed several laser procedures. There are abundant opportunities for us to learn the practice of lasers and perform them safely on live patients.	
Alyssa Shema, OD	Support in-office laser procedures by ODs	I urge you to support the draft regulations as presented without any changes. The draft regulations were developed with input from optometrist and ophthalmologists and should be supported as presented. Doctors of optometry go through extensive training in order to be able to perform these procedures and it will provide better access to care for Virginians. All optometrists must be certified in laser procedures before performing them on patients. Thank you.	10/25/24 8:43 pm CommentID:228539
Anonymous	Opposed to Draft Regulations	<p>As a recent graduate and now practicing ophthalmologist in Virginia, I write to express my deep concern for patient safety regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.</p> <p>Many factors can lead to challenges in performing a laser surgery procedures. A patient may be unable to stay still enough due to medical conditions or even poor positioning by the laser operator. If the laser application is even a millimeter off target, permanent and irreversible damage may develop in the patient's eye. Live proctoring of cases is a MINIMUM to develop the skills required to safely perform these laser procedures - it is NOT automated by the machines.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.</p>	10/25/24 8:44 pm CommentID:228540
Patricia Clubb, OD	Think of the patients - Support in-office lasers	Support! Keep in mind: Draft regulations as presented were developed with	10/25/24 8:44 pm CommentID:228541 P129

		<p>input from BOTH optometry and ophthalmology.</p> <p>Additionally, 12 states already include in-office laser procedures by optometrists. In office laser procedures have been performed by optometrists since the 1990s.</p> <p>Keep in mind that the point of the change is to ultimately help the patients in underserved areas. Virginia has almost 2X more optometrists than ophthalmologists. Optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.</p> <p>Thanks.</p>	
R. Nicholas	Support optometry	Optometry should be able to practice as taught. Just like any health profession in this state.	10/25/24 8:45 pm CommentID:228542
Michaela Varys	Opposed	I am writing as a concerned citizen in the Commonwealth. I did not previously know that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet. Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.	10/25/24 8:46 pm CommentID:228543
Gabrielle Anderson	Strongly support OD laser rights	As a 4th year student from the Kentucky College of Optometry, we had over a year in training in specifically how to do SLT, LPI, and YAG procedures. As our tests to pass the class we went through the same examination that current ODs go through to get certified to do lasers who are not currently in school. I have seen how optometrists having laser rights in Kentucky has expanded access to care for patients who otherwise would have not been able to travel due to distance, cost, etc. to the nearest ophthalmologist all of the optometrists who I have seen practice with lasers are very cautious. I believe optometrists having laser rights in Virginia will be beneficial to the patients the most. With the same level of certifications that the state of Kentucky requires is a fair requirement for the state of Virginia doctors to have to do.	10/25/24 8:46 pm CommentID:228544
Mike Haskett	Support in-office laser procedures by Doctors of Optometry	I support the regulations as written without change. These procedures have been performed by optometrists since the 1990's. Input has already been received by optometry and ophthalmology. As appropriate, effective and comprehensive certification is in place.	10/25/24 8:47 pm CommentID:228545

Lauren Webb	Opposed	I oppose this legislation. If you do allow optometrists to do laser, they certainly should have to have the same amount of training as any physician including proctored procedures on real patients. This is the safety standard I would want for my family and thus should be the expectation for all Virginians.	10/25/24 8:47 pm CommentID:228546
Brennan Lameier, Student Optometrist	Support In-Office lasers by Doctors of Optometry	Optometrists across several states have shown the ability to safely and effectively preform the skills necessary for patient treatment in regards to the use of Lasers. Denying access or attempting to restrict optometrists is simply denying patients adequate care that is necessary for eye care professionals to provide. Denial or stricter regulations is a step backwards that only puts a state like Virginia further behind so many others that have already paved a path towards better eye care for all. Optometrists are more than qualified to preform these procedures and denying access or road blocking access is not only lacking in logic, but driven by other motives that do not put patient care first, which is an absolute must for all aspects and pieces that fall under the eye care professionals tree. Students like myself that are afforded full scope practice have more than been adequately trained and educated in class, clinic, and CE in effectively treating patients with the best we have to offer.	10/25/24 8:49 pm CommentID:228547
Priyanka Patel	Support in-office lasers by doctors of optometry	<ul style="list-style-type: none"> • Support draft regulations as presented without any changes • Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor. <p>All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.</p>	10/25/24 8:50 pm CommentID:228548
Karen	Optometrist are trained in-person	Plenty of optometrists I trust with lasers. Great doctors!	10/25/24 8:50 pm CommentID:228549
W J Newman	Support for optometry	<p>To whom it may concern,</p> <p>I am a long time resident of Virginia and I am writing in support of the optometry regulations as presented. As my primary eye care provider, I trust my local optometrist with my sight and eye health needs. If I were to need one of these procedures, I would find it more convenient and be more comfortable seeing my optometrist, who knows my eye history and sees me yearly. If optometrist in 12 other states can safely and successfully perform these laser procedures, I don't see why Virginia should be any different. I support the draft regulations as presented and hope you will too.</p>	10/25/24 8:50 pm CommentID:228550

		sincerely, W J Newman	
William Kossol	Laser use by optometrists	I am in full support of the proposed regulations allowing Optometrists in the state of Virginia to use lasers. They are licensed and trained health care professionals. Let them do their job ! They are more than qualified. Stop this stalling. William Kossol	10/25/24 8:51 pm CommentID:228551
Michelle Tan OD	Support in-office lasers by doctors of optometry	Optometrists are well trained in ocular disease and glaucoma. Lasers are allowed already in 12 other states and they have demonstrated that optometrist can safely operate ophthalmic lasers with proper training and certification!	10/25/24 8:52 pm CommentID:228552
Anonymous	Strongly Oppose!	Why should someone who didn't go to medical school and didn't do a multiple year residency be allowed to laser my family's eyes? Especially if they only trained on a model eye???	10/25/24 8:53 pm CommentID:228553
		That is plain nuts! And a total money-grab!	
Optometrist Performing These Procedures In Another State	Support In-Office Lasers By Doctors Of Optometry	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. Optometry education and training supports the regulation requirements of 2 proctored sessions per procedure. As a residency trained Optometrist in Kentucky, I am performing these procedures safely in a hospital setting. I support these draft regulations.	10/25/24 8:53 pm CommentID:228554
Anonymous	Support for laser regulations as written	I support regulations as presented, they were developed with input from optometry and ophthalmology. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 8:53 pm CommentID:228555
Robert E. Botts, O. D.	Support long overdue in-office laser	Optometrists in the US have been using lasers since the 1990's.... just not in Virginia! Virginia's Optometry law is finally catching up to optometrist's education and training. It has been more than two years since the law passed. Please implement the regulations as written.	10/25/24 8:53 pm CommentID:228556
Anonymous	Patient supporting the expansion bill	Patient supporting the expansion bill	10/25/24 8:54 pm CommentID:228557
Jaden, Resident	Optometry Laser Regulations	I think optometrists in Virginia should be allowed to perform laser treatments. It's a bit ridiculous that other states, like California and Texas, already let their optometrists do this, while we're still holding back. The lobbying from ophthalmologists to block this change seems more about protecting their turf than about what's best for patients. Allowing optometrists to provide these treatments could really improve access to	10/25/24 8:55 pm CommentID:228558

		care and help folks get the eye services they need without long waits.	
Anonymous	Oppose optometrists from doing laser eye procedures	Strongly oppose optometrists doing laser eye procedures. They do not have the training or expertise to manage complications and are not physicians or surgeons and cannot perform surgical procedures on eyes !!!	10/25/24 8:55 pm CommentID:228559
Jisoo Song, OD	Support in-office lasers by doctors of optometry	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists.	10/25/24 8:55 pm CommentID:228560
Concerned patient	Opposed	It is highly concerning to think that non medical doctors without proper training would be allowed to perform laser surgery. Please protect our sight!	10/25/24 8:57 pm CommentID:228561
Anonymous	Opposed. Optometrists are not surgeons.	Dear Ms. Moss: I am writing you as a concerned citizen, as you are currently setting a dangerous precedent in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only). I am shocked and disappointed that our government would take our health and safety so flippantly. Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us. Sincerely,	10/25/24 8:57 pm CommentID:228562
Anonymous	No Laser Privileges	I am very fearful of laser privileges without proper training. There can be significant postoperative complications without experience or mentorship, and our optometric colleagues will likely not feel comfortable with managing their own possible complications.	10/25/24 8:57 pm CommentID:228563
Chelsea Johnson, O.D.,	Support optometry proposal as submitted	Optometry's Evolving Role: A Case for Expanded Privileges The field of optometry has witnessed significant	10/25/24 9:00 pm CommentID:228564 P133

advancements in recent years, enabling practitioners to provide a wider range of eye care services. As the scope of medical income continues to expand, it is imperative that optometrists are granted the necessary privileges to meet the growing healthcare needs of the population. The proposed regulations, which aim to expand the scope of practice for optometrists in Virginia, are both timely and necessary.

One of the primary benefits of expanding optometric privileges is increased access to quality eye care. Virginia currently boasts a significantly higher number of optometrists compared to ophthalmologists. This disparity in practitioner availability can lead to longer wait times and limited access to specialized eye care services, particularly for individuals from underserved communities and those with limited financial resources. By empowering optometrists to perform additional procedures, such as laser treatments, we can alleviate the burden on the healthcare system and ensure that more patients receive timely and appropriate care.

It is important to emphasize that the proposed regulations incorporate rigorous safeguards to protect patient safety. All optometrists seeking to perform laser procedures must undergo extensive clinical training, complete hands-on practice, and successfully pass a national board of optometry exam. These stringent requirements guarantee that only highly qualified individuals are granted the privilege to perform these delicate procedures.

In conclusion, the proposed expansion of optometric privileges in Virginia is a logical and necessary step towards improving access to quality eye care. By empowering optometrists to perform additional procedures, we can enhance patient outcomes, reduce healthcare costs, and ensure that everyone has the opportunity to achieve optimal eye health.

Laura K Green,
MD FACS

Eye Surgery need
to be done by Eye
Surgeons

As a fully trained eye surgeon, it is very concerning to me that Virginia would be considering allowing non-physicians who are non-surgeons to do laser and other incisional surgery, which means cutting on the structures of the eye and inside the eye. I grew up in Virginia, and much of my family still lives there and I want my older relatives to have access to properly trained surgeons to take care of the surgical needs of their eyes. Optometrists are wonderful eye doctors, but they are not surgeons and as someone who trains medical doctors to become eye surgeons, and someone who does these lasers herself, it takes a lot more than a weekend course to know how to properly use these lasers without blinding people because that is what is at stake. Please protect the eyes of Virginians. Eye surgery should only be done by fully trained eye surgeons.

Thank you

10/25/24 9:00 pm
CommentID:228565

Anonymous	Strong supporter	I know many optometrist and have seen their commitment and passion to ensure the safety and care to their patients for over 15 years. I know with proper training having this ability will just make sense and provide better care for patients. I strongly support this!	10/25/24 9:00 pm CommentID:228566
Anonymous	This is scary	Oppose.	10/25/24 9:00 pm CommentID:228567
Jacqueline Griffiths MD	Proposed guidelines for Optometry Laser Surgery	I agree with the VSEPS and NVAO and the AAO that patient safety should be of utmost importance. No one should be able to do delicate laser procedures without being proctored by someone knowledgeable in the field to, not only limit complications and bad outcomes but also be aware of complication management. It is a disservice to patients to be “certified” to perform delicate laser procedures after practicing on a model eye. Human tissue is very much different.	10/25/24 9:01 pm CommentID:228568
Anonymous	Strongly oppose	Ophthalmologists go to medical school followed by residency in order to safely perform surgeries like discussed in this legislation. Allowing optometrists to perform these surgeries without the training of ophthalmologists and without needing even one proctored procedure on a live person is putting a persons vision and livelihood at risk. They do not have the training to safely do this, especially with no oversight. Passing this is doing a disservice to all persons in the Commonwealth.	10/25/24 9:02 pm CommentID:228569
Ophthalmologist	YAG complications	<p>What are the Possible Complications and Side Effects of YAG Capsulotomy?</p> <p>YAG laser capsulotomy is a highly successful procedure with a very low risk of complications. Floaters are a common side effect after YAG capsulotomy but should settle steadily after the treatment.</p> <p>The possible complications are:</p> <p>Retinal tear. It is normal and common to get floaters after YAG capsulotomy, and these can take several weeks or even months to settle down. But if you develop lots of little black floaters, or lots of flashing lights it is possible that you have a retinal tear. This requires laser treatment to minimise the risk of a retinal detachment. If you develop a shadow or curtain in your vision it is possible that you are developing a retinal detachment. If you have any of these symptoms, please contact me or the Sussex Eye Hospital casualty urgently. The risk of retinal tear or retinal detachment after YAG capsulotomy is extremely low but is higher in people who have had previous retinal tears or detachments and in people who are very short sighted</p>	10/25/24 9:02 pm CommentID:228570

(myopic), in whom it may be around 1%.

Inflammation (approximately 1 in 200 people) and/or high pressure in the eye (less than 1:500): if you develop increasing pain, light sensitivity, reduced vision or redness of the eye, please contact me or the eye casualty at the Sussex Eye Hospital urgently. The risk of inflammation after YAG capsulotomy is around 1 in 200 people and of high pressure, probably less than 1:500.

Damage to the intra-ocular lens from the laser, affecting the clarity of the lens. This complication can occur when the laser practitioner is inexperienced but is extremely unlikely if the procedure is being done by someone who has performed this procedure many times before.

Cystoid macular oedema. This is fluid leakage or swelling of an area of the retina at the back of the eye and can cause the vision to become a bit cloudy. It generally settles without intervention or with eye drops, but very occasionally requires an injection in the eye. The risk thought to be significantly less than 1:100 people.

The overall risk of visual loss from YAG capsulotomy is around 1 in 5000 procedures.

Anonymous

Oppose optometrists performing laser procedures

Dear Ms. Moss:

I am writing you as a concerned citizen in the Commonwealth. I did not previously know that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet. Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes. I trust that the residents in the Commonwealth will not receive substandard care under your watch.

Sincerely,
Tiffany Kimbrough MD
Henrico county resident

10/25/24 9:02 pm
CommentID:228571

Anonymous

opposed the laser surgery certification by optometrists

The eye surgeries should be done by trained surgeons not Optometrists

10/25/24 9:02 pm
CommentID:228572

Anonymous

Vote No!

Strongly opposed and concerned about patient safety.

10/25/24 9:04 pm
CommentID:243604

			CommentID:228573
Christine Wisecarver, OD	Support OD lasers ◆ competent doctors improve patient care regardless of title	As a residency trained optometrist that has practiced comprehensive medical eye care alongside ophthalmologists for more than two decades, I can tell you that many of the ophthalmologists in our area call ME seeking help in managing their patients. That's right... MDs calling our ODs to ask for help in managing everything from keratoconus to herpetic eye disease. I have removed more corneal foreign bodies and treated more corneal ulcers than many general ophthalmologists in Northern Virginia. Those stating ODs are unqualified and dangerous have no idea what ODs actually do. There is not an OD working in an optical who has any interest in performing a YAG cap or YAG PI. This will only help improve patient access to care when MDs would rather be in surgery than doing a laser that has far less reimbursement.	10/25/24 9:04 pm CommentID:228574
Joshua Black	Support optometry proposal as submitted	<p>Optometrists are well educated, trained and certified to perform the procedures outlined in the regulations. More than 146,000 procedures have been performed by optometrists across the country with 12 states include in-office laser procedures by optometrists. Before performing the laser procedures on patients, all optometrists must be certified with extensive clinical experience, complete hands-on training and pass a national certification exam.</p> <p>I support Virginia increasing access to health care for patients all across the state. Virginia has almost 2X more optometrists than ophthalmologists. Optometrists are more than capable of performing these procedures safely and effectively.</p> <p>The population is aging, and the demand for health care providers is ever increasing. Virginia should allow well-trained doctors of optometry to care for these patients.</p>	10/25/24 9:05 pm CommentID:228575
Nilka Pabon-Torres	Full Support for Optometrists	Optometrists are completely trained and more than capable to perform laser procedures on patients. In fact, because some of these patients have limited access to ophthalmologists and most times long wait lists, these optometrists are performing vision saving procedures for our community. I fully support optometry regulations with no changes because I fully trust our ability to care for our patients.	10/25/24 9:05 pm CommentID:228576
Anonymous	Oppose	Oppose scope creep of this proposal	10/25/24 9:05 pm CommentID:228577
Bella	Patient care first: strongly agree	I have trusted my optometrist for over 20 years and would without a doubt support him in doing this procedure.	10/25/24 9:07 pm CommentID:228578
Gayle Masri-Fridling	DO NOT ALLOW ODs to lower the standards of laser surgery. VOTE	Allowing individuals who have never gone to Medical School to perform LASER eye surgery without training	10/25/24 9:09 pm CommentID:228579 P137

	NO!!	<p>and having used only a model eye is malpractice and a disservice to the citizens of Virginia! The Journal of the American Medical Association published 2 articles 2021 and 2024 stating that patients seen by allied professionals “ODs, PAs and NPs” MUST have alternating visits with MDs because they are not qualified to function without direct medical supervision. ODs are not required to have a college degree and Optometry school is in NO WAY COMPARABLE to Medical School. Ophthalmologists complete 12 to 13 years of training and are required to pass a series of rigorous exams for Board Certification. Only the Ophthalmology Boards are certified by the American College of Graduate Medical Education (ACGME). The Optometry “ Board” certification cannot qualify for ACGME certification because of the paucity of skills and training received in their limited 6 year education that does not include surgical or hospital rotations!</p> <p>DO NOT ALLOW ODs to lower the standards of surgery and endanger the sight of generations of Virginians!!</p> <p>Protect the citizens of Virginia and their eyes from ODs who want to overstep Medical School and declare themselves Laser Eye Surgeons without proper education and necessary training.</p>	
Yarimar Mercado	Support optometry regulations as presented	In-office lasers have been performed by optometrists since the 1990s...Virginia should not fall behind. We need more healthcare providers and optometrists are well-trained, caring doctors with extensive training in the management of ocular diseases.	10/25/24 9:09 pm CommentID:228580
Anonymous	DO NOT ALLOW ODs to lower the standards of laser surgery	<p>Voting NO!</p> <p>Allowing individuals who have never gone to Medical School to perform LASER eye surgery without training and having used only a model eye is malpractice and a disservice to the citizens of Virginia! The Journal of the American Medical Association published 2 articles 2021 and 2024 stating that patients seen by allied professionals “ODs, PAs and NPs” MUST have alternating visits with MDs because they are not qualified to function without direct medical supervision.</p>	10/25/24 9:09 pm CommentID:228581
Phillip Sowards, OD	Support in-office lasers for doctors of optometry	Optometry education and training are outlined in these regulations by at least 2 proctored sessions per each of the relevant procedures. As a residency trained optometrist who has performed hundreds of these procedures, I support these regulations as presented.	10/25/24 9:09 pm CommentID:228582
Anonymous	Full support	I support this fully.	10/25/24 9:10 pm CommentID:228583
Anonymous	Support as proposed	Because proposed training does not exclude hands on training, certification includes didactic and clinical	10/25/24 9:10 pm CommentID:228584

		education, I am in support of proposed regulations to improve meeting patient population needs.	
Anonymous	Voting No on allowing OD to use Lasers without training and physician	Voting No on allowing OD to use Lasers without training and physician	10/25/24 9:10 pm CommentID:228585
Linda Miller	Support in-office lasers by doctors of optometry	<p>Virginia has almost 2x more optometrists than ophthalmologists, making access to in-office laser procedures less burdensome to all patients in need of such care. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. Draft regulations as presented were developed with input from BOTH optometry and ophthalmology and should be supported as presented. Please support moving forward with passing these regulations, as this is a win-win situation for both patients and optometry.</p> <p>Sincerely,</p> <p>Linda Miller, OD</p>	10/25/24 9:11 pm CommentID:228586
Anonymous	Concern	It is unclear why the standard is not the same as other surgical procedures, with proctored education which benefits both providers and patients. No one is arguing that optometrists are not highly educated, but for a hands-on potentially blinding procedure when performed incorrectly, I do not think practice on a plastic model is enough. As the Board of Optometry finalizes the regulations for laser surgery certification, as a concerned ophthalmologist I would recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved.	10/25/24 9:11 pm CommentID:228587
Concerned Ophthalmologist	Concern over lack of knowledge and training	<p>Dear Ms. Moss:</p> <p>As a member of the Virginia Society of Eye Physicians and Surgeons, I write to you today to express my deep concern regarding the particular section in the draft regulations regarding proctoring for those individuals seeking certification for laser eye surgery.</p> <p>As the Board of Optometry finalizes the regulations for laser surgery certification, I strongly recommend amending the draft regulations to reflect a proctoring process that requires both didactic and live proctored cases, whether or not a plastic model is involved. Currently, the draft regulations are written so that proctoring can be done on a model eye or on a live patient, and in some cases proctoring is not even required.</p> <p>There is a wide spread list of physiological issues that</p>	10/25/24 9:11 pm CommentID:228588

		<p>can affect individuals' ability to remain still during a laser eye surgery procedure. Some examples of these varying factors can include, but are not limited to, tremors, anxiety, or breathing movements particularly for obese patients. The smallest movement of the patient's eye, even a centimeter, can result in dangerous and detrimental outcomes for the patient because laser eye surgery treatment is measured in the sphere of microns.</p> <p>This request comes with patient safety as the top priority and ensuring quality, safe care is provided throughout the Commonwealth. I strongly hope you will consider this change to the draft regulations to ensure optometrists across the state are trained to the highest standard.</p>	
Anonymous	Oppose	Must have equivalent training to MD DO ophthalmologists	10/25/24 9:12 pm CommentID:228589
Alexa Vinh	Support OD laser regulation	Expanding laser privileges to optometrists supports continuity of care. This allows patients to receive necessary treatment from their trusted providers, which ultimately improves patient experience and outcomes.	10/25/24 9:13 pm CommentID:228590
Karl C Saliba, OD	Support optometry proposal for in-office lasers by doctors of optometry	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented.	10/25/24 9:13 pm CommentID:228591
Jim Elias, OD	Support Optometry Laser Regulations	These procedures ALREADY SAFELY performed in 12 states by optometrists	10/25/24 9:14 pm CommentID:228592
Anh-Thu Phan, OD	Support optometry regulations as presented	Please support the draft regulations as presented. These regulations were developed with input from optometry and ophthalmology. Optometrists are educated, trained, and certified to perform the procedures outlined in the regulations. In fact, more than 146,000 laser procedures have been performed by optometrists across the country. Please work together for the benefits of the patients.	10/25/24 9:14 pm CommentID:228593
Katharine Damron	Support in-office lasers by doctors of optometry	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations	10/25/24 9:14 pm CommentID:228594
Melanie	Optometry	Optometry school taught in-person lasers >10 years	10/25/24 9:14 pm CommentID:228595
Anonymous	Support	I support this fully. Obviously ODs would be properly trained before performing. Please use common sense and support this. Patient care first!	10/25/24 9:14 pm CommentID:228596
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Eduardo Chusing	Optometry	I support lasers in optometry	10/25/24 9:15 pm CommentID:228597
Anonymous	Oppose.	more training is needed for this type of patient encounter/procedure. Physician only.	10/25/24 9:16 pm CommentID:228598
Supportive Patient	Support!!	As a patient, I support my optometrist gaining this privilege because I trust her. She takes time to explain my ocular health and recommends how we maintain it. I quit seeing ophthalmologists because they are so focused on invasive surgeries. These simple lasers are more within the scope of optometrists' practice because even a simple Google search shows most ophthalmologists don't even do them. All I see is cataract and LASIK surgery. I'd worry about my friends/family in rural areas even having access to these vision saving procedures.	10/25/24 9:19 pm CommentID:228599
Kriti kal	Oppose 1000% , there is not enough training!!	There needs to be adequate training to do invasive procedures. In no way, can this be learnt over a couple of months when the actual training takes more than years. We cannot keep handing over procedures that are routine to APP, they does not have the correct training to not do the procedures but manage any complications that may arise out of it.	10/25/24 9:19 pm CommentID:228600
An eye specialist with 15 years of experience	I vote absolutely no to ODs performing lasers on eyes	It may seem as simple as point and shoot but it is not only skill of how to shoot but when to use this technology and when it is dangerous. I am referred over 100 patient's a week to decide on if this treatment is a good option from ODs in the community and many times other diagnosis and pathology went unnoticed and performing the referred procedure would have caused harm and even vision loss. This is not a simple procedure. It is shooting a laser into an eye that is irreversible . It is non-sensical to allow non-surgeons to use a laser in the eyeball. The vast majority of people spend effort to choose among the surgeons in the region who they would allow to use this irreversible technology and this bill would allow many unqualified persons to have access. It is not safe and will add to morbidity. There is no access issue in Virginia. Our office can see these evaluations and perform the procedure within 2-3 weeks. Sooner if needed. This should NOT be passed.	10/25/24 9:19 pm CommentID:228601
Anonymous	Oppose	Surgery should be performed by qualified surgeons only.	10/25/24 9:20 pm CommentID:228602
Anonymous	Opposed- pt safety concern	No patients should be allowed to have lasers done in their eyes by untrained optometrists. The bigger issue is not just the skill to perform the laser but to do the laser for the right diagnosis and condition- and to also be able to manage complications. This requires training and experience!	10/25/24 9:21 pm CommentID:228603
Anonymous	Support draft regulations as	Virginia needs more healthcare providers to care for the aging population!! Ophthalmology output is not	10/25/24 9:22 pm CommentID:228604

	presented without any changes	keeping up with demand for healthcare services, and optometrists are more than capable of providing this level of care safely. Virginians come first!	
Mita Gupta	Support optometry regulations as presented	Optometrists are educated, trained, and certified to perform the procedures outlined in the regulations	10/25/24 9:24 pm CommentID:228605
Roshni Patel	Support optometrists performing lasers	Optometrists are often the first to see many patients who need lasers. Allowing optometrists to perform laser treatments can enhance patient access to care, especially in underserved areas, and help alleviate the burden on ophthalmologists, enabling them to focus on more complex surgical cases. It would make it a lot easier for patients to get treated in a timely manner if optometrists can perform lasers.	10/25/24 9:27 pm CommentID:228606
Karen Krotine	Support laser regulations	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented	10/25/24 9:28 pm CommentID:228607
EyeMD in VA	Who will clean up their mess	It is important to consider what happens when a person using a laser has a problem. Forget training or qualifications. What happens when an OD, who can not perform surgery, runs into a problem with the laser they were "taught?" Are they going to send to the MD who is qualified to fix it? I certainly will not accept these referrals and I'm sure my malpractice carrier will agree. I've been an expert witness to many times to accept this so easily. Really, we need to stop the politics and support safety! Regardless of these comments most making this vote would go to a surgeon for surgery. thank you for your time.	10/25/24 9:29 pm CommentID:228608
Saravana Balaraman	Don't put our patient's vision at risk	Eye/ Vision problems need someone with rigorous training and expertise of ophthalmologists. Optometrist should not be messing around with surgical procedures without comparable training of ophthalmologist.	10/25/24 9:33 pm CommentID:228609
Jared Tyhurst	Support in-office lasers by doctors of optometry	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. Please support draft regulations as presented without any change in order to make care more readily available in Virginia.	10/25/24 9:33 pm CommentID:228610
Dr. Myron E. Wasiuta	Support In Office Laser Procedures by Optometrists	I am strongly in favor of properly trained and certified optometrists being able to perform certain laser procedures in office. The draft regulations were developed with input from both optometry and ophthalmology and should be supported as presented. The laser procedures being considered would not be performed by just any optometrist. Those optometrists who wish to be able to perform these procedures will undergo formal proctored sessions which include detailed didactic and lab training. Optometrists who do not take this training would not be permitted to perform any of these	10/25/24 9:34 pm CommentID:228611

		<p>procedures.</p> <p>Important and interesting facts should be considered:</p> <p>There are more than 2x as many optometrists in Virginia than ophthalmologist, and optometrists are more widely dispersed than their ophthalmology colleagues. As such, many patients who live in rural areas may not have access to these surgical procedures unless performed by an optometrist.</p> <p>Optometrists are already performing laser procedures in 12 other states-and have performed over 146,000 procedures with an undeniable exemplary safety record.</p> <p>Optometrists receive more than 10,000 hours (4 years of training after college) of training which includes how to diagnose and treat ocular conditions such as glaucoma, dry eyes, as well as comanage conditions such as diabetic retinopathy and macular degeneration. Many optometrists pursue residency training after optometry school-making them even more experienced in managing these ocular maladies.</p> <p>Thank You,</p> <p>Dr. Myron E. Wasiuta</p>	
Dr. Peter E. Wilcox	Support in-office lasers by doctors of Optometry	<p>Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. The draft regulations were established by BOTH Ophthalmology and Optometry.</p> <p>Since the 1990's, over 3 decades ago, nearly 150,000 of these exact procedures have been performed by similarly trained and certified Optometrists in 12 other states. Thus, denying these regulations would be akin to stating licensed Virginia health professionals are less competent than those professionals in 12 other states. Optometry, Ophthalmology and our other VA professionals shall not be so besmirched!</p> <p>Support the Optometry regulations as presented.</p> <p>Sincerely,</p> <p>Peter E. Wilcox OD, FIAOMC</p>	10/25/24 9:34 pm CommentID:228612
Anonymous	Less training = unsafe	<p>increasing access to care should not put patients at risk. Optometrist are not physicians and are not surgeons. They should not be able to become surgeons through paperwork without five years of surgical residency training as is the standard for the rest of the medical field. Please stop taking physicians for granted and value the work we put into helping patients the right way.</p>	10/25/24 9:36 pm CommentID:228613
Anonymous	Vote No - Protect	As a physician who performs laser surgery, I can attest	10/25/24 9:36 pm


	Patient Safety	to the seriousness and complexity of performing laser surgery. Ophthalmologists spend 4 years in medical school plus another minimum of 4 years training under supervision to diagnosis and treat medical diseases of the eye. Laser surgery can be blinding if performed in unskilled hands. The idea of only doing a training module or practicing on a model eye prior to undertaking this serious procedure is unconscionable. Think about your own mother... you would never want her to undergo a potentially blinding procedure by an untrained/undertrained professional. Optometrists are a critical part of our healthcare system, screening our community for medical diseases that affect the eye and keeping our communities seeing well. But they are not trained to provide medical, and certainly not trained to provide surgical, care for our patients. This is an incredibly dangerous precedent to set. I strongly urge you to vote NO.	CommentID:228614
Ophthalmologist in VA	Being taught vs. training	<p>There are many wonderful and intelligent ODs in my region. Thousands of patients benefit from their care. The difference is ODs live in the world of reversible. Glasses, contacts, dry eye, drops, etc. MDs live in the world of irreversible. This is why MDs spend four years of being taught then 4+ years being trained. MDs need to see irreversible and know the cost of our actions. We do not have the luxury to refer when it is tough or dangerous or vision threatening. Lasers are dangerous especially when not done with this in mind, which is why many of my OD referred laser requests, I advise not to be performed.</p> <p>I fear this vote is more politics and lobbyists rather than common sense. Those who say other states passed it is no different. We need to care about our actions and the consequences of them. It is not simple! It is irreversible.</p>	10/25/24 9:38 pm CommentID:228615
Anonymous primary care physician	Oppose	This is incredibly unsafe for patients. Unfortunately, there is a huge amount of confusion in the general public between optometrist and ophthalmologist, especially with both being referred to as "Dr.", despite no residency training requirements for optometrist. The scope creep for mid- level providers across the field of medicine is horrendous and irresponsible, and we will pay for it in the near future with poor outcomes, lower quality of care, check-list medicine, and loss of physicians willing to stay in practice. This is all at the fault of corporate medical models trying to make quick bucks NOW, without regard to the future of healthcare or patient safety.	10/25/24 9:38 pm CommentID:228616
Laina Lee	Support Optometry Regulations as Proposed	Support the regulations as proposed. More than 140K procedures have already been performed successfully! Optometrists are and have been trained to do this since 1990. As a concerned citizen Optometrists are very well qualified to do these procedures.	10/25/24 9:38 pm CommentID:228617 P144

Anonymous	Oppose	Oppose as adequate training is a must	10/25/24 9:39 pm CommentID:228618
Gracie Lee, OD Student	Support optometry proposal as submittedv	<p>To whom it may concern,</p> <p>I fully support the optometry proposal. After reading through the comments on the forum that are opposed to the expanded scope of practice in regards to patient safety I realized the general trend was personal reasons or confusion on the expanded laser law from other health care professionals. A simple google search of a "YAG Capsulotomy" procedure will yield multiple websites and ophthalmology practices reporting how the procedure is so safe that it can even be performed in office. After looking for studies supporting each side of the argument there were no studies that showed unsatisfactory outcomes or visually significant complications from optometrist's performing laser procedures. The Nd: YAG Laser Capsulotomy: Efficacy and Outcomes Performed by Optometrists study concluded that YAG: Capsulotomies are effective treatments and have been safely performed by optometrists. I have seen firsthand the visual outcomes of laser procedures performed by optometrists in Kentucky and they have all had great visual outcomes. What a wonderful opportunity you have to pass this law to give even more patient's access to this vision improving procedure.</p>	10/25/24 9:40 pm CommentID:228619
Lucas Spiker	Support laser regulations	Access to healthcare is crucial in rural Virginia, where patients frequently travel long distances for basic laser eye procedures. Currently, optometrists in 12 states are conducting in-office laser procedures, having completed over 146,000 procedures to date. For this reason, I support the proposed draft regulations as presented.	10/25/24 9:41 pm CommentID:228620
Mike Zolman	Support Optometrists!	This is great! Optometrists are the best! So glad they can now further serve their community even better than before!!	10/25/24 9:42 pm CommentID:228621
Anonymous	Oppose	To conduct a procedure on a model eye is not equivalent to a human eye. Standards have been lowered for care often not due to need but for money. Training is not equivalent to an ophthalmologist. People are not experiments.	10/25/24 9:43 pm CommentID:228622
Jen Weigel, OD, FAAO	Support in-office lasers by doctors of optometry	<p>Thank you for allowing comments on this important process that will allow greater access to care by citizens of the Commonwealth. Virginia optometry has long been a leader in the profession, serving as 1 of 12 states in which in-office laser procedures by optometrists is allowed.</p> <p>Please support draft regulations as presented without any changes. Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. I</p>	10/25/24 9:43 pm CommentID:228623

		<p>myself served on one of the regulatory panels where discussion by optometry and ophthalmology was allowed prior to voting on recommendations.</p> <p>Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. More than 146,000 procedures have been performed by optometrists across the country since the 1990s. Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.</p> <p>All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.</p> <p>It is important to remember that all people and professions have the ability to learn new skills post-graduation. Ophthalmologists are not the only profession capable of expanding their skills set.</p>	
Rosehannah Carmichael	Supporting Virginia's Laser Expansion Law	The Virginia laser expansion law is a significant step forward in improving access to essential eye care. By allowing certified optometrists to perform laser procedures like YAG laser capsulotomy and selective laser trabeculoplasty, the law helps ensure that more patients receive timely and effective treatment for conditions such as glaucoma and post-cataract care. This expansion of scope not only enhances patient care but also acknowledges the advanced training and expertise of optometrists, ultimately benefiting the entire community. Anyone who opposes is doing so based solely on financial benefit to themselves and their own community.	10/25/24 9:43 pm CommentID:228624
Mojde Bahreman	Support laser regulations/optometrist	<ul style="list-style-type: none"> • Optometrists are educated, trained and certified to perform the procedures outlined in the regulations 	10/25/24 9:44 pm CommentID:228625
Margaret Johnston, OD	Support optometry proposal as submitted	In-office lasers have been performed by optometrists since the 1990s. More than 146,000 laser procedures have been safely performed by optometrists across the country	10/25/24 9:45 pm CommentID:228626
Sona Kalra	Support optometry regulations as presented	<ul style="list-style-type: none"> • Support draft regulations as presented without any changes • 12 states include in-office laser procedures by optometrists • More than 146,000 procedures have been performed by optometrists across the country • Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor. 	10/25/24 9:45 pm CommentID:228627
			P146

Anonymous	Oppose- safety concern	<p>Laser surgery should be performed by trained ophthalmologists. These procedures require technical skill and an ability to adapt to atypical situations in order to be completed safely. These skills require more extensive training than is currently proposed here to develop.</p> <p>More importantly, these procedures change the anatomy of the eye and may not always be in the best interest of the patient to perform depending on the clinical context. I personally have seen multiple patients who have had laser procedures that then put them at higher risk for complications or limited their options for subsequent eye surgeries that were needed down the line. The decision to proceed with these types of procedures should be made by ophthalmologists who have had the training to appreciate the broader context and implications of laser surgical intervention for each individual patient.</p>	10/25/24 9:47 pm CommentID:228628
Dalton Haynes Optometry Student	Support Optometry Regs	The visual outcomes from ND Yag can be life-changing to patients. I have rotated through multiple practices in rural Virginia while in school, and there are a considerable number of times patients have to be referred hours away for a simple laser procedure. As a student I can assure you we had multiple courses discussing potential side effects, indications and contraindications for these laser procedures. We are also trained to perform these procedures in our curriculum. Optometrists in more than 10 states are trained and certified to carry out these procedures, and there are no current studies showing negative results.	10/25/24 9:48 pm CommentID:228629
Renee Smith, CPOA	YES to optometrists in Virginia performing laser procedures!	I am a certified ophthalmic technician and will be attending optometry school in the fall of 2025. When I graduate, I would really love to come back to Virginia for practice and have the ability to perform these laser surgeries. I have been working in comprehensive eye care at a private practice for 5 years and the doctors and staff are fully rounded to meet the needs of our patients. This is another opportunity to quickly and readily improve vision, without needing to see another doctor, and keeping follow ups with their family eye doctor. This would be very beneficial for both optometrists and ophthalmologists because it will lighten the schedules for the ophthalmologists, and more optometrists will be more available to see these patients, whereas the ophthalmology clinics usually have appointments booked out very far. I want to vote yes for this decision!!!!	10/25/24 9:52 pm CommentID:228630
Anonymous	Vote No.	No training no procedures. Patient safety first	10/25/24 9:54 pm CommentID:228631
Anonymous	SUPPORT in-office laser procedures by optometrists	We are taught full scope and lasers are included. We are competent enough to perform these procedures	10/25/24 9:55 pm CommentID:228632 P147

Kylie Donahue, OD	Support For In-Office Lasers by Doctors of Optometry	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. Likewise, more than 146,000 procedures have been performed by optometrists across the country. I support the use of lasers by Doctors of Optometry.	10/25/24 9:56 pm CommentID:228633
Derek Bryant Optometry Student	Optometrists are Trained Qualified	Every optometry school across the United States is training their students to perform these procedures. These procedures use the same skills that optometrists use every single day in their practices. Complications are inevitably in some cases just as they are when Ophthalmologists perform the procedures. We are already trained to manage and do manage complications that arise from procedures that ophthalmologists have performed so there's really no reason we shouldn't be performing these procedures because we are 1. Qualified to do so and 2. Already do manage any possible complications.	10/25/24 9:57 pm CommentID:228634
David Clauss, O.D.	Support in-office lasers by doctors of optometry	<ul style="list-style-type: none"> • 12 states include in-office laser procedures by optometrists • Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. <p>Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.</p> <p>Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented.</p>	10/25/24 9:58 pm CommentID:228635
Anonymous OD	Fully support OD's expansion of scope	I fully support the optometry proposal. After reading through the comments on the forum that are opposed to the expanded scope of practice in regards to patient safety I realized the general trend was personal reasons or confusion on the expanded laser law from other health care professionals. A simple google search of a "YAG Capsulotomy" procedure will yield multiple websites and ophthalmology practices reporting how the procedure is so safe that it can even be performed in office. After looking for studies supporting each side of the argument there were no studies that showed unsatisfactory outcomes or visually significant complications from optometrist's performing laser procedures. The Nd: YAG Laser Capsulotomy: Efficacy and Outcomes Performed by Optometrists study concluded that YAG: Capsulotomies are effective treatments and have been safely performed by optometrists. I have seen firsthand the visual outcomes of laser procedures performed by optometrists in Kentucky and they have all had great visual outcomes. What a wonderful opportunity you have to pass this law to give even more patient's access to this vision	10/25/24 10:01 pm CommentID:228636

		improving procedure.	
Chariya Christmon	Oppose	<p>Dear Ms. Moss:</p> <p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).</p> <p>I am shocked and disappointed that our government would take our health and safety so flippantly.</p> <p>Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>Sincerely,</p> <p>Chariya Christmon, MD</p>	10/25/24 10:01 pm CommentID:228637
Lily Chen, OD	Support optometry regulations as presented	Support draft regulations as presented without any changes. Keep in mind that draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 10:03 pm CommentID:228638
Current OD Student	100% support OD  s	I am a student at your neighboring states school, Kentucky college of optometry. I have seen first hand how amazing this expansion is for rural areas and easy access to care for those who are not privileged enough to drive hours for these less than 10 minute in office procedures. The visual outcomes from ND Yag can be life-changing to patients. I have rotated through multiple practices in rural Virginia while in school, and there are a considerable number of times patients have to be referred hours away for a simple laser procedure. As a student I can assure you we had multiple courses discussing potential side effects, indications and contraindications for these laser procedures. We are also trained to perform these procedures in our curriculum. Optometrists in more than 10 states are trained and certified to carry out these procedures, and there are no current studies showing negative results.	10/25/24 10:04 pm CommentID:228639
William F Johnston Jr OD	Support laser regulations	Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals,	10/25/24 10:04 pm CommentID:228640 P149

including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a “weekend course,” when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists.

All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.

Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.

Sarah Link

In Support of Proposed Regulations

Optometrists are trained to perform in-office laser procedures, and have been safely helping patients with these procedures in other states for many years. I support the proposed regulations with no changes or modifications.

10/25/24 10:04 pm
CommentID:228641

Anonymous physician

Oppose

Dear Ms. Moss:

I am writing you as a concerned citizen in the Commonwealth. I did not previously know that our government is allowing non-surgeons to operate on our eyes. I am even more concerned that our government is recommending that a lower standard of care be expected of optometrists than the eye surgeon ophthalmologists are required to meet. Please do everything you can to ensure the highest standards of care are not compromised. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.

10/25/24 10:05 pm
CommentID:228642

Anonymous

Oppose, unsafe and unnecessary

As an ophthalmologist early in my career, I can attest to the rigorous training and precision required to perform eye laser procedures safely and effectively. These procedures demand exceptional hand-eye coordination and the ability to focus a laser with precision often under 1 mm. In residency, most trainees need dozens of supervised cases to develop this skill, even with 3-4 years of intensive training before independent practice is permitted. This extensive preparation isn't arbitrary; complications from these procedures can be severe, potentially resulting in vision loss and requiring surgical intervention to address.

10/25/24 10:05 pm
CommentID:228643

		Allowing professionals with limited training to perform these procedures introduces unnecessary risk to patient vision and safety.	
Anonymous	Support the regulation as proposed	Schools of optometry have been teaching hands-on lasers for over 10 years. MDs already allow use of lasers of non-doctor professionals such as PAs. Although they are supervised by MDs at time, many of the times the MD is not in the room while they are performed. Optometric use of lasers is going to open up opportunities for the underserved communities both urban and rural areas to obtain care they may not otherwise receive due to both distance and affordability.	10/25/24 10:05 pm CommentID:228644
Anonymous	Support optometry reg	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations	10/25/24 10:06 pm CommentID:228645
Dr. OD	Support in-office lasers by doctors of optometry	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 10:07 pm CommentID:228646
A Kentucky Ophthalmologist	Strongly oppose - Optometry complications	You may be hearing from proponents of who claim there have been “no complaints” or “no adverse outcomes” from optometrists performing the surgeries authorized as part their scope of practice expansion in some other states. Unfortunately, for a number of patients across the Commonwealth of Kentucky, those claims are simply not true. The following cases are just the tip of the iceberg after consulting with only a few ophthalmologists, and many more exist: Eastern KY: While performing a needle injection of anesthesia into an eyelid, a Kentucky optometrist and “teacher of optometry surgery” accidentally went through the eyelid and directly into the eye. This is a grave complication, yielding endophthalmitis (blinding eye infection) a retinal detachment, or toxic issue from the drug in the needie. Central KY: In an adult patient who had pediatric cataract surgery and was stable for decades, an optometrist lasered the vital capsule that was separating the two chambers of the eye, causing a severe glaucoma with eye pressures three times what is normal, resulting in permanent harm to the optic nerve. Fixing this tragedy took two operations by ophthalmologists (medical doctors and trained eye surgeons). Eastern KY: While attempting to perform a YAG capsule surgery, another “teacher of optometric surgery” subjected a patient to a multi-hour procedure. This procedure takes a seasoned ophthalmologist about	10/25/24 10:07 pm CommentID:228647

5 minutes.
 These struggles yield multiple laser injuries to the lens of the eye and corneal abrasions.
 Eastern KY: While attempting to remove a “benign” eyelid lesion, a “professor of optometry surgery” used another provider's loupe magnifiers and proceeded to use the dull edge of a #11 scalpel.
 Central KY: A patient who saw an optometrist for a peripheral iridotomy on one eye was subjected to having the procedure done multiple times, over multiple visits. For her second eye, the patient begged the practice to have an ophthalmologist perform the surgery so it would be performed correctly the first time.

These surgical complications are in addition to numerous misdiagnoses, inappropriate therapy and overlooked problems by Kentucky Optometrists that many of our members have personally treated. There are multiple cases of missed corneal infections, inappropriately treated corneal ulcers, and missed glaucoma that were never reported because there is **no medical board oversight** or supervision of optometrists in Kentucky, and optometrists here are not required to report adverse outcomes or complications to their licensing board. The absence of a malpractice lawsuit or a recorded complaint filed with the board of optometry does not equate to the absence of harm to the patient.

Bradley Church	Support in-office lasers by Doctors of Optometry	The drafted regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Thank you for your consideration.	10/25/24 10:07 pm CommentID:228648
Paul Mitchell OD	Support Laser Regulations	I support the draft regulations as written without changes. Optometrists are trained to perform lasers and will be certified before performing them.	10/25/24 10:08 pm CommentID:228649
Ying-Ta Chen OD	Support in-office lasers by doctors of optometry	In-office lasers have been performed by doctors of optometry since the 1990s. Currently, 12 states include in-office laser procedures by optometrists. The draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 10:09 pm CommentID:228650
Anonymous	Support lasers regulations	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations	10/25/24 10:09 pm CommentID:228651
Brooke Major, Optometry Student	Support optometry regulations	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 10:10 pm CommentID:228652
Chris Hansen	Support in-office laser use by doctors of optometry	Doctors of optometry are educated, trained, and certified to perform these laser procedures, which were approved by law in Virginia over two years ago. This will significantly improve patient access to these	10/25/24 10:13 pm CommentID:228653 P152

important procedures, as there are nearly twice as many optometrists as ophthalmologists in Virginia. Currently twelve states allow optometrists to perform these laser procedures already -- and more than 146,000 of these procedures have been performed safely and effectively by optometrists since the 1990s.

Please do not allow this law to be de-railed by outside groups.

Thank you.

Anonymous

explain how it makes sense that ODs be held to a substantially lower training standard than MDs

The matter at hand is not whether or not optometrists should be allowed to perform laser surgical procedures. That ship has already sailed as our Virginia politicians foolishly legislated this new privilege into existence. We get it... the dollar signs in their eyes put there by the powerful optometry lobby clouded their collective foresight.

Rather, the debate here is over whether or not optometrists should be held to the same training standards that MD ophthalmologists are held to in terms of the necessary mentorship and supervision required to perform laser procedures independently on the flesh and blood citizens of the state of Virginia.

As currently written, the certification that will be required of optometrists to perform laser surgeries does not require any training on actual real human beings.

On the other hand, MDs typically perform dozens if not hundreds of laser surgeries as resident physicians; and always WITH supervision. As others have stated, a human sitting at a laser is vastly different than a plastic eye. The comparison is simply not even close.

That so many ODs have come here to vehemently support the legislation “as written” shows us that they truly don’t even know what they don’t know. But why should we expect otherwise? They don’t have anything close to what resembles the surgical training of their MD colleagues.

This has nothing to do with “access” to care. This is not rural Montana, there are a sufficient number of ophthalmologists here to serve the needs of Virginians. The legislation succeeded because of the stronger lobbying power of optometry.

It truly is a disservice to our shared mission of protecting the vision and eye health of our patients.

Honestly, it's incredibly dismaying that so many optometrists feel they don't need any supervised

10/25/24 10:15 pm
CommentID:228654

training whatsoever on an actual REAL person prior to performing these procedures completely independently. This would **NEVER EVER EVER** happen or be allowed on the MD side of the curtain of any procedural discipline. It simply does not happen.

So again, the question remains: why is it okay for optometrists to be held to a vastly lower training standard than their MD surgeon colleagues? I challenge any OD reading this -- please , enlighten me-- give me a compelling argument. Heck, any argument. Why the resistance to needing actual, real, legitimate training? How does this put you out so much? Why the opposition to this? Please provide a good reason why you don't need any supervised laser procedures on a human being. If you want to be surgeons, then train like a surgeon. The legislation, as stands, is unsafe and inadequate.

Anonymous

Support laser privileges for optometrists

Optometrists are often the first to see many patients who need lasers. Allowing optometrists to perform laser treatments can enhance patient access to care, especially in underserved areas, and help alleviate the burden on ophthalmologists, enabling them to focus on more complex surgical cases. It would make it a lot easier for patients to get treated in a timely manner if optometrists can perform lasers.

10/25/24 10:17 pm
CommentID:228655

MD

Physician advocating for patient safety

Dear Ms. Moss:
I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).
I am shocked and disappointed that our government would take our health and safety so flippantly.
Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.
Sincerely,

a concerned family physician

10/25/24 10:17 pm
CommentID:228656

Anonymous

Support!!

Access to laser treatment is an important part of patient care. Allowing optometrist to perform certain procedures could have a profound positive affect in eye care in the state of Virginia. Patients would be able to

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CommentID:228657

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		have better access to these treatments with more personalized attention to their care.	
Concerned Richmond emergency medicine physician	Strongly oppose	Optometrists do not have the same level of training as ophthalmologists (4 years med school + 4 years residency + often fellowship). How is practicing on models sufficient? If something goes wrong, who will deal with the complications? Will optometrists be able to manage the full spectrum of possible complications? When we lower standards, patients will suffer. This is highly inappropriate.	10/25/24 10:21 pm CommentID:228658
Hillary O'Boyle, MD	Opposed	<p>Dear Ms. Moss:</p> <p>I am writing you as a concerned citizen in the Commonwealth. I just learned that the General Assembly and Governor passed a law allowing non-surgeons to operate, and that the Board of Optometry is about to allow non-surgeons to perform laser surgeries on eyes after no hands-on training (didactic coursework only).</p> <p>I am shocked and disappointed that our government would take our health and safety so flippantly.</p> <p>Please do everything you can to ensure the highest standards of care possible in the Commonwealth. If we have to endure this unfortunate law, please make the regulations as close as possible to the actual surgeons' requirements, such as requiring all optometrists to have proctored live cases prior to being allowed to operate on us.</p> <p>Sincerely,</p> <p>Hillary O'Boyle, MD</p>	10/25/24 10:22 pm CommentID:228659
Anonymous	Strongly support	Trained optometrists are skillful and knowledgeable enough to provide an excellent service in ophthalmic lasers.	10/25/24 10:22 pm CommentID:228660
Anonymous	Support Laser usage by Optometrists	Support Laser usage by WELL trained Optometrists!	10/25/24 10:25 pm CommentID:228661
CHARLES W. HARRILL, OD, DIPL. ABO	SUPPORT OPTOMETRY REGULATIONS AS PROPOSED	Optometry schools and colleges have taught/trained students in these procedures for several years now. Implementation of these regulations will provide greater access to quality eyecare in the Commonwealth.	10/25/24 10:25 pm CommentID:228662

MD CV surgery	Certificate to operate after using a PLASTIC eye! Insanity.	Are we in a developed nation? Do we not have enough trained surgeons who have spent years in residencies operating on human eyes before being set loose on humans? Would we allow surgery on the heart after practice on the Operation board game? Insanity.	10/25/24 10:26 pm CommentID:228663
Linda Pinsky, OD	Support optometry regulations as presented	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented <ul style="list-style-type: none"> All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. 	10/25/24 10:26 pm CommentID:228664
Anonymous	Optometrists pay more to be board certified than MD/DO	Allow doctors to be doctors. Lasers are routinely done by optometrists in Indiana, what's the difference	10/25/24 10:26 pm CommentID:228665
Sara Varghai	Support laser regulations	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 10:27 pm CommentID:228666
Support!	Support!	Allow OD use of lasers	10/25/24 10:28 pm CommentID:228667
Steve Holbrook	Support optometry regulations as presented	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. I support these changes. These types of lasers are done by optometrists every day around the country without complications. The only argument ophthalmologists ever make is about their profession losing control and dollars. It is never valid safety issues.	10/25/24 10:28 pm CommentID:228668
Becky Mann, OD	Support optometry regulations without changes	The presented draft regulations were developed with input from both optometry and ophthalmology , already. Optometrist are educated, trained and certified to perform procedures outlined in the regulations. Support optometry regulations without changes.	10/25/24 10:28 pm CommentID:228669
Michael Chism, OD	Support ODs using lasers	Optometrists are educated, trained, and capable of performing treatments with lasers. Simple as that.	10/25/24 10:30 pm CommentID:228670
Dr. Sofia Ahmad	Support laser regulations	General thoughts -Optometrists are educated, trained and certified to perform the procedures outlined in the regulations -Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented General facts	10/25/24 10:30 pm CommentID:228671

		<p>-12 states include in-office laser procedures by optometrists</p> <p>-More than 146,000 procedures have been performed by optometrists across the country</p> <p>-Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases.</p> <p>It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to</p> <p>enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser</p> <p>procedures are combined with other training, they are a part of the overall eye care services provided by optometrists.</p> <p>-Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.</p>	
Christopher J Renner	Support regs as written	The state legislature voted in favor of this legislation, the governor signed it and the board has proposed regulations to implement the law. Ophthalmology is attempting to refight the legislative battle that has already been decided. The desire to provide the highest level of care necessary to treat patients effectively is laudable. Optometrists meet this need daily, in Virginia and across the country, including use of laser devices. I support the regulations as proposed. The quality of health care of Virginians will be enhanced.	10/25/24 10:31 pm CommentID:228672
Andrew Ambrose OD	Support optometry regs	Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. More than 146,000 procedures have been performed by optometrists across the country.	10/25/24 10:33 pm CommentID:228673
Anonymous	Oppose optometrists performing last surgery	To Whom It May Concern I am writing to you as a concerned physican about allowing optometrists performing eye surgery without the same training as eye surgeons/ophthalmologists. Ophthalmologists go through 4 years of medicinal school and additional 4 years of residency before being able to practice independently. The amount of patient care hours and supervised surgeries on real people cannot be compared to the suggested training that would allow optometrists to perform laser surgery. Allowing optometrists to perform laser surgery is very much a patient safety issue and I oppose this proposed regulatory action. Please ensure that optometrists are required to perform the same laser training that ophthalmologists are required, including live proctored cases, prior to being allowed to operate on our eyes.	10/25/24 10:33 pm CommentID:228674
Anonymous	Support, model safer than human test subjects	Laser procedures are safe with minimal adverse effects that can be easily managed by ODs. Wouldn't you rather have a doctor who practiced on model eyes until	10/25/24 10:34 pm CommentID:228675 P157

		they were comfortable with the technique to perform your simple laser procedure, as opposed to a new resident doctor who is using you as their human practice rounds before getting comfortable?	
Marcia Leverett	Support in-office lasers by doctors of optometry	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. Please support draft regulations as presented without any changes	10/25/24 10:34 pm CommentID:228676
Anonymous	Oppose - not equivalent training to MD/DO	Scope of practice creep. Simulation training not equivalent to MD training.	10/25/24 10:36 pm CommentID:228677
Anonymous	Support in-office lasers by doctors of optometry	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. In-office lasers have been performed by optometrists since the 1990s. Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists.	10/25/24 10:38 pm CommentID:228678
Anonymous	Optometrists are qualified	Optometrists are eye specialists. 4 years of med school is not comparable to 4 years of optometry school, which is dedicated to the eyes. You don't need to learn how to perform a pelvic exam or deliver a baby in order to operate a laser. Optometrists focus on the eyes and know how to perform these skills and treat inflammation post-lasers	10/25/24 10:38 pm CommentID:228679
Anonymous	Eye MDs	This very simple any legislator that allows Optometrist lasers the law should also state that that legislator and his or her family can only see optometrists for all their eye care. Including but not limited to all glaucoma procedures all retinal procedures all cataract procedures and sutured IOLs. Surgery is for MDs. Very simple. We will take it a step further they can only see PAs for all and any surgical procedures on themselves and family members.	10/25/24 10:39 pm CommentID:228680
Anonymous	Support Optometrists	I know several optometrists and ophthalmologists performing these procedures in Kentucky with minimal complications at similar rates. The fear mongering is very disheartening to see.	10/25/24 10:41 pm CommentID:228681
Dr. Kishan Patel	In support of ODs practicing Lasers	Doctors of optometry are well equipped to handle lasers. Multiple stats have been published from other	10/25/24 10:41 pm CommentID:228682

	and Advanced procedures	states that show the effectiveness of ODs performing these procedures	
Carrie	Surgery should be done by medical doctors!!	<p>Laser to the human eye is SURGERY. Surgery is done by surgeons. In order to do surgery, one attends 4 years of undergrad. 4 years of MEDICAL (not optom) school, and then FOUR MORE YEARS of residency. The residents are taught in person, real time , and by BOARD-certified eye physicians and surgeons. Residents perform FIFTEEN HUNDRED surgeries during their training. An optom simply CANNOT ever ever do a “model eye” laser, and then proceed to laser real human eyes.</p> <p>this is an anathema. We must each speak the truth, and stand up for patient safety.</p>	10/25/24 10:41 pm CommentID:228683
Anonymous	Physician advocating for patients' safety.	<p>I am writing as a concerned citizen in the Commonwealth about non-surgeon performing eye surgeries. I oppose suggested proposal.</p> <p>Please help uphold the highest standards for every surgical procedure by ensuring appropriate training, what is achieved through medical school training, residencies and fellowships.</p> <p>Very respectfully,</p> <p>Dr Beata Barreto</p>	10/25/24 10:42 pm CommentID:228684
David Jacobs, MD	ophthalmic laser surgery is surgery and is a patient safety issue	<p>I just heard about this new proposal for optometrists requesting laser surgery privileges. First, in Virginia there are sufficiently trained ophthalmologist eye surgeons to meet our population's need for laser surgery. Where is the unmet need that would require us to train more ophthalmic laser surgeons in Virginia particularly providers who do not have equivalent surgical experience in their training as ophthalmologists?</p> <p>Second, ophthalmic laser surgery is surgery with inherent risks of complications. I can speak as an ophthalmologist retina surgeon performing retinal lasers daily that even in experienced hands ophthalmic lasers can cause unintended tissue damage, intraocular hemorrhage, and vision loss. An even more common problematic outcome is that the laser surgery is not successful. Retinal detachments occur and progress to cause vision loss even after correctly applied preventative laser retinopexy. Today in fact two weeks after a prophylactic retinal laser of retinal breaks a patient of mine presented with a macula threatening</p>	10/25/24 10:43 pm CommentID:228685

		<p>retinal detachment that I took to the operating room for urgent retinal detachment repair.</p> <p>There is a common sense patient safety issue here for our fellow Virginians that appears to be overlooked. Ophthalmic laser surgery indications, technique, risks, and follow up are so nuanced that it should be performed by eye surgeon ophthalmologists that have the thousands of hours of hospital based 3 year residency training. I respect and receive routine eye exams from my optometrist friends and colleagues and will continue to do so. I have not heard a valid argument from my optometrist colleagues on why there is a patient need for optometrists to perform laser surgery especially in light of the unequivocal training in surgery between ophthalmologists and optometrists. Why would we intentionally put patients at risk of less successful outcomes from a lower tier of surgical training when there is not a pressing need?</p>	
Courtney Francis MD	Stop dangerous legislation	Optometrists are simply not trained to perform the requested surgeries nor are they trained to understand the indications or manage the complications of them. Requests to expand surgical scope for improved access to care is dangerous and leaves our most vulnerable patients with substandard and potentially blinding care. I strongly oppose this legislation.	10/25/24 10:44 pm CommentID:228686
Anonymous	Support!	ODs are trained in school, can get nation and state board certified for lasers, and can get mentored by ophthalmologist or experienced OD if they elect to do lasers. There is not a threat to society. Doctors personally elect to perform what they are comfortable taking on.	10/25/24 10:46 pm CommentID:228687
Anonymous	VOTE NO! Optoms are NOT eye surgeons	Optometrists simply do NOT have the training that it takes to perform lasers on patients. The amount of mismanagement referred to ophthalmologists is inexcusable. Opening this door further is a recipe for disaster. Vote no in the interest of the public. The excuse to expand access to care is by no means an excuse to allow untrained people to perform lasers.	10/25/24 10:47 pm CommentID:228688
Anonymous	OPPOSED	This is an example of how we are unsafely approving everyone to do procedures that take short period of time but require skill and knowledge base. MD ophthalmologists undergo rigorous training starting in medical school. Without learning the anatomy and learning the surgical techniques in a surgical program and taking the MD ophthalmology written and oral board examination-no one should be allowed to perform laser or any procedure with an excuse that there is a need. There are many physicians available in the state of virginia to perform these procedures safely. If an optometrist can score above 90th percentile in the American Board of Ophthalmology written and oral examination-sure (even though they skipped medical	10/25/24 10:48 pm CommentID:228689

		<p>school and cut all the years of training down to few yrs). If they cannot pass the ABOP (this is board exam for ophthalmologist. Not any board created by anyone.) That would be the first step. Why not go to medical school? No shortcuts when it comes to surgeries for patient safety.</p>	
Amanda Brewer-Lord	support the laser law	<p>This is such a great law for Virginia. I live in a remote area of Virginia and the ability to offer this service to my patients is invaluable. I was trained to perform these procedures and have kept up with performing these procedures through continuing education and training. This law is supported not only by optometrists but also by ophthalmologists. There are multiple states allowing these procedures to be performed by optometrists. These procedures are safe, optometrists are trained to do these procedures, and these procedures are needed by our community.</p>	10/25/24 10:49 pm CommentID:228690
Amber McCulley, ClearSight EyeCare	Laser Regulation	<p>Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. Our education and training supports the regulation requirements of 2 proctored sessions per procedure</p>	10/25/24 10:49 pm CommentID:228691
Anonymous	Support	<p>Other states allow lasers (SLT, YAG capsulotomy, LPI) done by ODs and it's great! Thanks!</p>	10/25/24 10:50 pm CommentID:228692
Katrina Chin Loy, MD, immediate past-president WDCMOS	Oppose legislature for patient safety	<p>Lasers are used to treat a variety of eye disease processes including glaucoma, diabetic retinopathy and secondary cataracts. During ophthalmology residency, physicians learn not only how to perform laser procedures for optimal patient safety and outcomes but also the nuances of pre-procedural patient selection and counseling, and post-procedural management of any potential complications. This is learned through hours of hands-on time with patients with graduated autonomy, beginning from observing an attending physician perform a procedure to direct, and eventually indirect, supervision by the attending physician. Over the course of 4 years, residents typically participate in over one hundred laser procedures as the primary surgeon, and dozens more as the assistant. As a former Ophthalmology Residency Program Director locally, I have first-hand experience in this rigorous training process and evaluation. A brief unsupervised course or a couple of proctored sessions (potentially on a model eye even) cannot replace the extensive, supervised, hands-on training that ophthalmologists receive on these lasers in residency. As an eye physician and surgeon, if the need ever arose, I would only want a fellow trained surgeon to perform these delicate procedures on my friends, family, or myself.</p>	10/25/24 10:50 pm CommentID:228693
David LeRoux, O.D.	Support in-office lasers by doctors	<p>Doctors or optometry are trained and certified to perform the procedures outlined in the regulations.</p>	10/25/24 10:51 pm CommentID:228694

	of optometry		
Tara DeRose, O.D.	Support In-Office Lasers by Doctors of Optometry	I am an Optometrist in Colorado, successfully and safely performing in-office laser procedures. Our patients have been grateful for the care they are able to receive by their trusted doctors. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations.	10/25/24 10:53 pm CommentID:228695
Gemma Meadows, OD	Support optometry regulations as presented	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. More than 146,000 procedures have been performed by optometrists across the country.	10/25/24 10:54 pm CommentID:228696
Andrew Kartesz, Kartesz Eye Care	Support the laser law	In Virginia, most of our patients live in rural communities without easy access to lasers, as the primary care eye doctors, optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists.	10/25/24 10:55 pm CommentID:228697
Anonymous	Support, capable ODs can do lasers easily	ODs shadow optometrists and ophthalmologists for 1 yr prior to graduation. Courses are taught on lasers, risks, post op care etc. OD residents are proctored. ODs wanting to practice lasers are proctored. What would ODs gain from risking their license by practice lasers without being comfortable or properly trained?	10/25/24 10:55 pm CommentID:228698
Anonymous	Concern for patient safety	Laser surgery is not trivial. Permanent vision damage following laser treatments is not impossible. Prioritize patient safety.	10/25/24 10:57 pm CommentID:228699
Bruce Kiraly, OD	Strongly support the laser optometry regs as written	Optometry, as a group, has historically always been proactive in requiring rigorous training, both didactic and practical, and testing, whenever there have been changes in their scope of practice. These changes have always been done solely to improve the quality of eye care available to residents all across Virginia. These laser procedures are done in-office, are very straightforward in nature, and can safely be done by a skilled optometrist. The safety record and efficacy of optometric laser procedures done in other states since the 1990s is exemplary. The draft regulations as presented were developed by both optometrists and ophthalmologists and, as such, should be supported intact.	10/25/24 11:09 pm CommentID:228700
Jared Quesenberry,	Support in-office laser procedures	Support the draft regulations as presented. This was drafted with input from optometry AND	10/25/24 11:11 pm CommentID:228701

OD	for Doctors of Optometry	<p>ophthalmology. Optometrists have been doing these procedures since the 90s!</p> <p>Furthermore, a study by Lighthizer et. Al. Nd:YAG Laser Capsulotomy: Efficacy and Outcomes Performed by Optometrists” found that YAG capsulotomy procedures performed by licensed ODs were safe and effective. 99% of patients reported improvement in visual acuity and there were no significant adverse events noted. This and other findings continue to contribute to a growing body of evidence that these procedures can be safely and effectively performed by licensed optometrists.</p>	
Optometry Student	Support	<p>Firstly, I would like to respectfully point out the misleading way in which MD’s are framing the procedures outlined in these regulations. Many are using the term laser “surgery” to make these procedures seem highly invasive and complicated. However, in a majority of ophthalmologic literature, MD’s cite lasers as relatively quick, simplistic outpatient “procedures”. Unsurprisingly, it seems MD’s would like these laser procedures to sound more complicated and invasive when it suits their agenda.</p> <p>Secondly, patients and MD’s have rightfully brought up concerns about OD’s ability to handle potential complications from these laser procedures. I will link a recent article reporting the low prevalence of complications reported from laser procedures performed by OD’s. I will also link an article discussing further the more vision-threatening complications that can arise post-YAG procedure regardless of the title of the person firing the laser. A few of these include: retinal detachments, CME, and glaucoma. These conditions are certainly something OD’s would know how to identify and manage.</p> <p>I would also like to address the supposed lack of training from OD’s to handle laser procedures. OD’s spend 4+ years extensively studying the eye and systemic health. Included in this curriculum is coursework and hands-on training for laser procedures. MD’s only start to learn laser procedures during residency, which is about 3-4 years. It’s not like they spend four years of med school PLUS residency learning these techniques. I would be curious to hear from MD’s about the amount of hours they spent practicing laser procedures before performing it on a live patient.</p>	<p>10/25/24 11:11 pm CommentID:228702</p> <p style="text-align: right;">P163</p>

While I agree that there are many OD's that I would not trust to do a laser procedure on my family members, I could say the same for a handful of the MD's I've worked with over the years. Inevitably, in any field, there are people who will not take safety or boundaries of their own knowledge into account.

At the end of the day, optometry is the backbone of ophthalmology. Together we make a beautiful spinal column. If MD's want to continue to reap the benefits of having OD's to give them referrals and \$\$\$, but want to diminish their training and competence, neither of our professions are focusing on what's best for the patient. Ultimately, OD's and MD's are meant to have a synergistic relationship, playing to each other's strengths and weaknesses. Tearing each other down does nothing to further either of our fields.

Expanded scope of practice is not meant to take opportunities away from MD's. It's meant to benefit the patient.

Articles mentioned:

<https://www.reviewofoptometry.com/article/study-confirms-safety-of-optometric-laser-surgery>

<https://iovs.arvojournals.org/article.aspx?articleid=2787826>

<https://europe.opthalmologytimes.com/view/yag-shots-in-iols-safe-or-dangerous->

Anonymous

Support optometry regulations as presented

Please support draft regulations as presented without any changes. These were developed with input from optometry and ophthalmology and should be supported as presented. All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam.

Thank you.

10/25/24 11:12 pm
CommentID:228703

Anonymous

Support laser regulations

Draft regulations as presented were developed with input from optometry and ophthalmology and should

10/25/24 11:19 pm
CommentID:228704

		<p>be supported as presented</p> <p>Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases.</p> <p>It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a part of the overall eye care services provided by optometrists.</p>	
Dr Zuhail Arzomand	OPPOSE!	There will be grave consequences if those who are not trained well enough start performing surgeries. Leave the surgeries and complicated procedures to those who are medical doctors and have done actual training in this.	10/25/24 11:22 pm CommentID:228705
Dr. Charlotte McKnight	Oppose	Oppose!	10/25/24 11:24 pm CommentID:228706
Anonymous	Oppose	Oppose	10/25/24 11:24 pm CommentID:228707
Karisa	Major negative repercussions	<p>Hi Ms. Moss,</p> <p>I'm sure you're feeling inundated with so many letters! Sorry- here's one more. I understand the desire to give optometrists a larger scope of practice. But if they only need to take a quick course and then they can operate, there will be a LOT of (eye) casualties along the way. It's way too dangerous and the risks are too high to allow this shortcut.</p> <p>My very bright, coordinated son (1470 on the PSATs, woot woot!) just received his driver's license. Every morning the two of us pray for his safety, and then I watch him reverse out of the driveway and pull onto our street. Despite being in my embarrassing pajamas and barefoot on the cold pavement, I keep watching him drive away until the car is completely out of sight. Even though my son is so smart and capable, it's the basics he continually forgets-- flipping on the headlights when it's dark, removing the parking brake, remembering how to de-fog the windshields, etc. I often need to chase after his car as he's pulling out to urgently remind him of these details. ("TURN ON THE HEADLIGHTS!" "SWITCH OFF THE PARKING BRAKE!"). For those of us who have been driving for decades, we have these automatic actions down. But there's no shortcut to experience, and with time he'll get better. For now though, it is extremely unnerving and we are grateful every day he comes home unscathed.</p> <p>If we really must let optometrists operate on eyes, then</p>	10/25/24 11:25 pm CommentID:228708

they need lots of in-person, proctored experience. Not just book learning or a breezy online course. If not, we are certainly facing lots of dangerous crashes in the surgical rooms.

Thank you for considering,

Karisa

Anonymous

100% SUPPORT

As an OD practicing in the same clinic with MDs, I fully support this laser regulation! I can name several patients I referred over for a laser procedure that cannot get in to see an MD for several months! It's unfair and unfortunate for the patient to wait that long for treatment that's needed on a timely basis. I have also seen misused laser procedures by MDs, where it wasn't necessary for the patient, as well as poor outcomes with complications on mutual patients. MDs aren't perfect either! For the ocular well being of patients in VA, ODs should be allowed to perform laser procedures. There are twice as much ODs than MDs in VA, so they will have better access.

10/25/24 11:26 pm
CommentID:228709

Michelle Le,
OD

Support Laser
Regulations

There is an undeniable disparity in eye care services in Virginia, with twice as many optometrists as ophthalmologists in the state. By allowing certified optometrists to expand their scope of practice, we can address this disparity and improve access to essential eye care services for residents across Virginia.

As a practicing optometrist in an urban area with a high concentration of ophthalmologists, I see firsthand the challenges my patients face in accessing timely care. Many of them have to wait weeks, or even months, before they can be seen by a specialist. This is unacceptable and only exacerbates the already limited access to eye care services in underserved and rural areas of Virginia.

It is clear that the greatest threat to healthcare is not negligence, but rather accessibility. By expanding the scope of practice for certified optometrists, we can work towards ensuring that all residents of Virginia have access to the eye care services they need and deserve. Let's work together to remove these barriers and improve the health and well-being of all Virginians.

10/25/24 11:27 pm
CommentID:228710

Sapho Doan,
Northern

Support optometry
proposal as

10/25/24 11:29 pm
CommentID:228711

Virginia Doctors of Optometry	submitted	<ul style="list-style-type: none"> • Optometrists are educated, trained and certified to perform the procedures outlined in the regulations • 12 states include in-office laser procedures by optometrists • More than 146,000 procedures have been performed by optometrists across the country • in-office lasers have been performed by optometrists since the 1990s • Virginia has almost 2X more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor. • All optometrists must be certified in laser procedures before performing them on patients. To be certified, they must have extensive clinical experience, complete hands-on training and pass a national certification exam. 	
Anonymous	If optometrists want to perform laser surgery, they should apply to and complete medical school!	If optometrists want to perform laser surgery, they should apply to, be accepted by, and complete medical school, complete internship, and complete ophthalmology residency. There is no substitute. This is a travesty! STRONGLY OPPOSE . They should never perform any surgical procedure. Patients who do not know the difference between ophthalmologists and optometrists will suffer the consequences, and this is tragic.	10/25/24 11:30 pm CommentID:228712
Gary St. Clair, O.D.	Optometry Laser Regulation	Support Optometry regulation as written without change.	10/25/24 11:32 pm CommentID:228713
Anonymous	Optometrists are fully qualified!!	I support optometrists performing laser procedures as they have EXTENSIVE training in this area! Hours of practice, in class education and hands on training—probably more so than some ophthalmologists! Not only this, but they are able to reach more patients due to the modality of their practice! Think of the eyes and the lives that can be improved by continuing to support optometrists in performing laser procedures! This doesn't take away from ophthalmologists, this ADDS to the care of an ever growing patient population!	10/25/24 11:32 pm CommentID:228714
David Stanfield, OD	support in-office lasers by Doctors of Optometry	I support the draft regulations as presented without modification. Optometrists have received extensive training prior to performing in-office ophthalmic lasers	10/25/24 11:40 pm CommentID:228715 P167

		in the US since the 1990s with an excellent safety profile. Because optometrists are significantly more numerous than ophthalmologists, our vulnerable populations will benefit from improved access to care.	
Anonymous	Oppose	Oppose for patient safety	10/25/24 11:41 pm CommentID:228716
Savannah Upshaw, OD Student	Strongly Support Optometrists	I strongly support this bill in its entirety. Optometrists are thoroughly trained in laser procedures and are highly knowledgeable and proficient in performing said procedures. Studying in and providing for eastern KY has shown that many patients do not have access to care via an ophthalmologist. Optometrists can provide the same standard of care to these patients and are trained and educated to the standard of the regulations in this bill. As a current optometry student at the Kentucky College of Optometry, I can say that we are trained for an entire year on performing said laser procedures safely, efficiently and with the patient's best interest. In the following year, we are given multiple opportunities and hands on experience to practice these procedures under guidance of attending physicians. Again, I strongly support this bill.	10/25/24 11:44 pm CommentID:228717
Stefan Young	Support In-office lasers by doctors of optometry	Please support regulations as presented without any changes. Optometrists are trained and certified to perform laser procedures, increasing access for patients. I myself have undergone the certification process and look forward to the chance to practice to the full extent of my education. Thank you	10/25/24 11:45 pm CommentID:228718
Christian	Support Laser Regulations	Optometrists are trained, educated, certified to perform these procedures. Virginia has almost 2x more optometrists than ophthalmologists, making access to these procedures less burdensome to the working poor.	10/25/24 11:45 pm CommentID:228719
Stephen Hinkle, OD	Support Optometrists using lasers	As an optometrist, my first duties are to what is in the best interest of my patients. I feel every optometrist I know feels the same way I do. With that in mind, none of us would perform any procedure on any patient without adequate training and confidence and I feel lasers in optometry would be treated the same way. For that reason, I strongly support optometrists being allowed to use lasers.	10/25/24 11:46 pm CommentID:228720
Anonymous, Virginia Optometric	Support Optometry Laser Regulation as	The answer is simple. Ophthalmologists do not have a monopoly on knowledge. Optometrists are trained and	10/25/24 11:48 pm CommentID:228721 P168

Association	written without change	fully capable of performing these laser procedures.	
MorshedEye PLLC	Laser Essential To Primary Care Optometry	After practicing in the Washington DC area including private practice in both Bethesda & Vienna, I moved to KY, one of the first 4 states to promote medical. I was humbled by how far behind I was from the sight saving optometrists here. That was 2016 and since then I have actively pursued my laser continuing education 8 consecutive years as it is a requirement to practice here. Here we have a “free” laser center to encourage optometrists to serve at the highest scope. We are also offered 1:1 shared care with skilled optometrists and ophthalmologists to reinforce clinical standards. It is not only safe, but quite beneficial with the underserved populations we see in today’s America. Privileged to serve in a state that insist on advancement in primary care and camaraderie amongst providers. As an interactive learner I absolutely support the draft regulations as presented without changes.	10/25/24 11:50 pm CommentID:228722
Anonymous	Absolutely oppose	Title aside, the same training needs to be in place to perform laser surgery. It is not only the procedure itself, but the decision making and the ability to troubleshoot complications and problems. 100 percent oppose. Put patients first and do not allow this to go through.	10/25/24 11:52 pm CommentID:228723
Virginia Ophthalmologist	Strongly Opposed	<p>Legislators,</p> <p>As an ophthalmologist, I have trained for 13 years to be a surgeon and endeavored to pursue this career since childhood. I have invested much to pursue this career and still owe a sizable debt for my education. There is a pathway to a career in performing surgery. It is through a degree in medicine and the training that comes with it. I encourage all optometrists and surgically interested students to follow this path. The laser procedures being discussed here took me 5 years to learn with both didactic and ophthalmologist-supervised training on real patients.</p> <p>I know that there is a shortage of physicians and issues with access to care. I also understand that there is a decline in profitability of optical shops with a surge in the online glasses market that has led to an interest in finding other sources of revenue. Giving surgical privileges to those inadequately trained will not solve these issues. They will simply make bigger problems for the surgeons to clean up. There are many cases of cancers misdiagnosed as chalazia, glaucoma inadequately treated with numerous rounds of laser trabeculoplasty, retinal detachments from yag capsulotomies undiagnosed and so on...in states where surgical privileges have been granted and scope expanded.</p> <p>I have the strongest respect and admiration for my</p>	10/25/24 11:53 pm CommentID:228724

partners in optometry. They play a vital role. I believe we can work together in a collaborative way that makes best use of our skills to allow us to best care for the patients in all of our communities. A model with optometrists as primary eye care providers, regulation against online retail of glasses, and utilizing ophthalmologists as more surgically oriented would be a start.

Thank you all,

Concerned Ophthalmologist

Safe Eyes America

Optometry requirements for laser surgery

Safe Eyes America (safeeyesamerica.org) is a patient organization dedicated to ensuring the delivery of the highest quality eye care to the public. On behalf of the organization and the citizens that we represent, it is completely beyond comprehension that a lowering of the standards for performing eye surgery on patients eyes is even under consideration. Without a doubt, patients deserve only the highest quality, SAFE eye surgery. Allowing optometrists to perform laser eye surgery without direct, live in person supervision of training on actual patients is simply unacceptable. There is no substitute that could possibly ensure safety for patients. Please do not consider allowing lowering of the standards for safe care of the eyes of patients and their vision. Patients must be protected by safe standards for their eye care. Direct supervision of actual surgical procedures is absolutely required for patient safety. No patient should be subjected to having their eyes and vision being “the first” surgical experience for their eye surgeon.

10/25/24 11:54 pm
CommentID:228725

Gregory Schultz

Support in-office lasers by doctors of optometry

The public should support this bill because certified Doctors of Optometry are more than qualified to perform these procedures safely on the public. There are eleven other states where Optometrists are already performing Laser procedures. The argument often given is a lack of patient experiences compared to our MD colleagues.

Graduates of PCO (my institution) enter the profession with nearly 3,000 hours of clinical experience.

Upon graduation as an optometrist one has had approximately 2000 patient experiences. Those who do a residency adds another 3000-4000 more patient experiences. These laser procedures can be easily performed by well trained medical optometrists.

What the public needs to know:

1. Not all OD’s will want to perform these laser procedures, but those with the highest level of training will and can safely.

10/25/24 11:55 pm
CommentID:228726

2. Anyone who decides they will perform these procedures will have passed didactic study, clinical training, and pass a board exam and practical on the use of these lasers. Most of us have already had laser courses while in optometry school.

As one of the first 40 OD's in the state to be certified on Laser procedures, here is what I can tell the public.

The procedures are not difficult for OD's to perform as we use these skills every day. All have mastered the use of a slit lamp biomicroscope and proven competency with the gonioscopy procedure. Gonioscopy, the procedure of evaluating the anterior chamber angle, is a skill every OD must master to graduate. This procedure takes practice and is challenging to master. Optometrists must demonstrate competence and mastery of this procedure to pass their boards. Use of the laser is quite easy frankly, once these other skills are mastered. It really comes down to access to care for Virginias residents, and optometrists are just more accessable to Virginias residents .

Dr. Erick Henderson, OD

Support Draft Regulations as Presented

As a current practicing optometrist who participates in the training and education of ophthalmologists and optometrists, I fully support the draft as written. Optometrists like myself are highly qualified individuals with more than sufficient training to perform these procedures. I am trained and licensed to perform these procedures along with many other optometrists.

Unfortunately there is a misinformation campaign by some of my ophthalmology colleagues that disparages my profession and the work that optometrists do for our patients. It is unfortunate that the greed and lack of knowledge by those opposed to this bill will likely have a worse outcome for patients by spreading misinformation and preventing patients from receiving care.

I support passage of the National Board of Examiners in Optometry's Laser and Surgical Procedures Examination as a certifying mechanism, or a course approved by the Virginia optometric licensing board to be evidence of appropriate didactic and clinical laser surgery training.

Thank you,

Erick Henderson, OD, FAAO

10/25/24 11:56 pm
CommentID:228727

ophthalmologist

Protect our most precious sense

There is no easy surgery. Why would anyone advocate for less training to perform eye surgery, arguably our most precious sense. Is that the person that you want to operate on your or your loved ones eyes? Rather, it is best to have a surgeon that is trained and can recognize

10/25/24 11:57 pm
CommentID:228728

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		and handle the complications. Please insist on in-person training for optometrists to perform laser eye surgery on Virginians.	
Anonymous	Support laser regulations	Doctors of optometry are trained and qualified to do these procedures safely and effectively, as already shown in other states in the country. These regulations are adequate to supplement what is already being taught and practiced in optometry school.	10/25/24 11:57 pm CommentID:228729
Anonymous	Non MD/DO perform laser operation frequently across the country	Physician assistants and NP and sometimes even nurses. Some states even allow offsite and sometimes the physician doesn't even have to be onsite. Where are all headlines and uproars and about taking laser privileges away from these non-MD professionals across the the state's. Where are all the medical harm and public health studies confirming that these non-doctors are doing to harm the safety of patients. Yet optometrist are doctors, learn 4 years dedicated to eye care and disease and even do in-person hands in training at schools of optometry for over a decade now. Yet someone it's okay to allow non-doctors at all to administer difficult needles and lasers.	10/25/24 11:58 pm CommentID:228730
Lee S	Strongly oppose changing the standard of care for eye surgery	There is already an established, competency-based process by which individuals gain the education and training necessary to perform laser eye surgery safely on the public. It is by this process of proctored live eye surgery, supervised by expert surgeons, that the public can be assured that an individual is safe to perform surgery. This is routinely undertaken by ophthalmologists completing their surgical residency after medical school education. This proctored experience on live patients supervised by surgeons is not present in optometric training, but is taught to every ophthalmologist by the time their residency is complete, ensuring to the public that a certain standard has been met. This rigorous process serves as a safeguard to ensure public safety. Changing this standard of care to allow for a didactic course, or for practice solely on a model eye, as a criterion to perform laser eye surgery is simply not sufficient to guarantee safety. Optometrists play an important role in eye care delivery, but surgery on the eye should be performed by ophthalmologists.	10/25/24 11:58 pm CommentID:228731
Matt Friedman	Support optometry regulations as presented	Draft regulations as presented were developed with input from optometry and ophthalmology and should be supported as presented. Optometrists train for nearly 10,000 hours to learn how to diagnose and treat glaucoma, cataracts and other diseases. It's not uncommon for medical professionals, including optometrists, to participate in continuing education programs to enhance their profession and scope of work. While more is involved than a "weekend course," when these common laser procedures are combined with other training, they are a	10/25/24 11:59 pm CommentID:228732

		part of the overall eye care services provided by optometrists.	
Jacob McCarter, Student of Optometry	Support optometrists performing laser procedures	<p>Optometrists spend four years in education to understand ocular anatomy, physiology, health and treatment. After the first two crucial didactic years of developing a deep understanding of intricacies of the eye and body, optometry students are trained for utilization of lasers, including development and practice of performing these procedures. In the year following, students are given the opportunity to perform these procedures under strict supervision and guidance of skilled and seasoned physicians. Optometrists put in the time and effort to perform laser procedures according to this bill. To say they have not is simply not true.</p> <p>Many patients, especially in rural areas, do not have the means to see an ophthalmologist for their procedures and some simply do not care to travel the distance needed to do so. If trained optometrists are available and capable of providing this care to these patients, why deny them?</p> <p>I strongly support this bill.</p>	10/25/24 11:59 pm CommentID:228733
Erin Woods OD	Support optometry regulations as presented	I am writing in support of draft regulations as presented without any changes. These regulations were developed with input from optometry and ophthalmology with attentive regard. Optometrists are educated, trained and certified to perform the procedures outlined in the regulations. This certification process includes extensive clinical experience, complete hands-on training and pass a national certification exam.	10/25/24 11:59 pm CommentID:228734
Optometrist licensed for Advanced Procedures in AR (SLT and YAG)	Support	With any skill that healthcare providers are privileged to provide to the community, many considerations are made, including 1. the need (access to care is essential) and 2. the ability (we are able and capable providers).	10/26/24 12:01 am CommentID:228735
Anonymous	Vehemently oppose	There have been cases of unnecessary patient harm in other states that allow optometrists to perform laser eye surgery. Unless a surgeon has performed numerous laser procedures and seen enough surgery to understand the potential risks, changing this standard of care would be reckless. Surgical safety cannot be legislated; it must be taught through a rigorous process. Please do not lower the standard of care that all Virginians deserve.	10/26/24 12:04 am CommentID:228736

Optometry Monthly Snapshot for August 2024

Optometry closed more cases in August than received. Optometry closed 3 patient care cases and 3 non-patient care cases for a total of 6 cases.

Cases Closed	
Patient Care	3
Non-Patient Care	3
Total	6

Optometry has received 1 patient care case and 2 non-patient care cases for a total of 3 cases.

Cases Received	
Patient Care	1
Non-Patient Care	2
Total	3

As of August 31, 2024 there were 17 patient care cases open and 2 non-patient care cases open for a total of 19 cases.

Cases Open	
Patient Care	17
Non-Patient Care	2
Total	19

There are 1,885 Optometry licensees as of August 31, 2024. The number of current licenses are broken down by profession in the following chart.

Current Licenses	
Optometrist	46
TPA Certified Optometrist	1,839
Total for Optometry	1,885

There were 7 licenses issued for Optometry for the month of August. The number of licenses issued are broken down by profession in the following chart.

Licenses Issued	
TPA Certified Optometrist	7
Total for Optometry	7

BOARD OF OPTOMETRY

2025 CALENDAR

FEBRUARY 6, 2025 (Thursday)	BR 3 9:00 a.m.	BOARD MEETING FORMAL HEARING IF NEEDED
May 15, 2025 (Thursday)	TR 1 HR 2 & 4 9:00 AM	INFORMAL CONFERENCE(S)
JULY 17, 2025 (Thursday)	BR 3 9:00 a.m.	BOARD MEETING FORMAL HEARING IF NEEDED
November 12, 2025 (Wednesday)	BR 4 9:00 a.m.	BOARD MEETING FORMAL HEARING IF NEEDED
December 4, 2025 (Thursday)	TR 2 HR 2 & 4 9:00 AM	INFORMAL CONFERENCE(S)

CALENDAR_OPT_2024