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January 24, 2022

The Honorable L. Louise Lucas
Senate Education and Health Committee
Pocahontas Building, Room E604
900 East Main Street
Richmond, VA 23219

Dear Chairwoman Lucas and Members of the Committee:

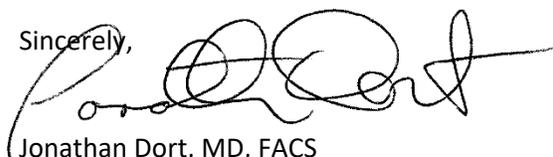
On behalf of the Virginia Chapter of the American College of Surgeons (VA-ACS), I am writing to you to state our opposition to Senate Bill 375 which significantly expands the scope of practice of optometry into the practice of medicine including the ability to perform complex surgery. This raises considerable patient safety and quality of care concerns, especially at a time in health care when patients expect higher standards of quality care – not a reduction in those standards as would occur in the enactment of SB 375.

The American College of Surgeons (ACS) has a strong history of addressing matters relating to patient care and safety, and we are concerned that SB 375 permits optometrists to practice medicine without the oversight and education requirements imposed on medical doctors. Practicing outside of their scope of practice and without proper supervision by a medical doctor may endanger Virginia citizens to unsafe practice environments and procedures.

SB 375 contains provisions that would allow optometrists to use injectable pharmaceutical agents and perform many surgical procedures for which they are not specifically prohibited in the bill. In 2007, the ACS adopted a statement containing a definition of surgery. As noted in the statement, "Injection of diagnostic or therapeutic substances into body cavities, internal organs, joints, sensory organs, and the central nervous system is also considered to be surgery." The ACS statement also notes that any procedure that can damage the eye (cornea or retina) should only be performed by a licensed physician. (Statement on surgery using lasers, pulsed light, radiofrequency devices or other techniques (http://www.facs.org/fellows_info/statements/st-11.html)).

In the interest of patient safety and maintaining the highest standards of surgical care, the American College of Surgeons believes that the types of procedures permitted in SB 375 should only be performed by a licensed Medical Doctor (MD) or Doctor of Osteopathic Medicine (DO) who meet appropriate education, training, and professional standards. Enactment of SB 375 would expand the scope of optometry beyond an optometrists' training and education to include the practice of medicine and, as defined in the ACS statement, the practice of surgery. As such, the Virginia Chapter of the ACS strongly urges you to protect patient safety for Virginia citizens and oppose SB 375.

Sincerely,



Jonathan Dort, MD, FACS
President