

**Statement for the Record
American Society of Retina Specialists
House Committee on Veterans' Affairs
Health Subcommittee Hearing
September 19, 2023**

The American Society of Retina Specialists (ASRS) is the largest retina organization in the world, representing over 3,500 board-certified ophthalmologists who have completed fellowship training in the medical and surgical treatment of retinal diseases. The mission of the ASRS is to provide a collegial open forum for education, to advance the understanding and treatment of vitreoretinal diseases, and to enhance the ability of its members to provide the highest quality of patient care.

ASRS counts many veterans and physicians who have trained at Veterans Affairs (VA) hospitals as its members. We thank the committee for this hearing and appreciate the opportunity to share our deep concern about a potential, unprecedented scope of practice expansion for optometrists providing care in VA facilities.

As the VA continues to develop standards of practice for numerous allied health professionals providing necessary care to veterans in VA facilities, we ask for Congress' oversight to ensure veterans' eye health is protected. **We ask for your support to prevent the VA from proposing standards for optometrists that allow them to perform surgical or invasive procedures, which are currently well outside of the majority of state licensing restrictions and standard optometric training.**

Significant Differences in Training

Retina specialists, like other ophthalmologists, have completed four years of medical school, a hospital internship, and three years of ophthalmology residency training, and then completed an additional two-year retina fellowship. During their education, retina specialists receive extensive one-on-one training in surgical techniques and managing potential complications—both ocular and systemic. Successfully operating on eyes requires meticulous and finely honed microsurgical techniques. While it is frequently performed with little or no complications, that success is directly attributable to the proficiency of retina specialists and other ophthalmologists. These delicate procedures carry the risk of irreversible vision loss if not performed at an expert level.

Optometrists, by comparison, have no such training. The typical optometric education rarely goes beyond the post-graduate level and mainly focuses on examining the eye for vision prescriptions, dispensing corrective lenses, performing some eye screening functions, and prescribing topical medications. While optometrists are an integral part of the eyecare team, they are generally not permitted to perform invasive procedures on the general population, so expanding their scope through the VA poses risks to veterans they would not face if they sought care from private facilities.

Current Scope of Practice Issues

We believe our fears that a proposed standard would vastly and inappropriately expand optometrists' scope of practice in the VA are not unfounded. In September 2022, the VA removed language from its

Community Care “Standardized Episode of Care: Eye Care Comprehensive” guidelines stating “only ophthalmologists can perform invasive procedures, including injections, lasers, and eye surgery.” This change was made without input from the ophthalmic community and we believe presages what will be included in the proposed standards of practice—without Congressional oversight.

The effort to expand optometrists’ scope of practice in the VA system mirrors similar attempts on the state level. In nearly every state, there have been attempts to modify state licensing requirements to allow optometrists to perform surgical procedures. Yet, they have only been successful in a handful of states. In 2022, California Governor Gavin Newsom vetoed an optometric surgery bill specifically citing the lack of training as the rationale behind his decision. We ask Congress to urge VA to approach this issue like so many states have to date and prevent potential harm to veterans’ eye health.

Most importantly, preventing the VA from expanding the scope of optometric practice will protect all patients, not just veterans. While state-based efforts have not been overall successful, a national standard that allows optometrists to perform surgery could inappropriately prompt further changes at the state level. Congress must step in to ensure the VA Supremacy Project does not have unintended consequences beyond the VA system.

Potential Negative Tradeoffs

Empowering untrained optometrists to perform surgical procedures would be an unprecedented break with current standards of care. Since there is no standard for training optometrists to perform surgical procedures and very few states where it is permissible, allowing optometrists to perform procedures in the VA is essentially offering up our nation’s veterans as unwitting guinea pigs in a trial of untrained professionals’ surgical skill.

The argument for allowing optometrists to perform procedures is generally that it will expand access to eye care for veterans. While ASRS agrees that veterans deserve timely access to care, we do not believe that quality of care should be shortchanged to meet that goal. Veterans are a precious group of patients who have risked their lives for the safety and security of our nation. We owe it to them to ensure they do not receive sub-standard care. **If an identifiable access issue exists, we urge Congress to work with the VA to find other, more appropriate means of addressing it rather than lowering the quality of eye care for veterans.**

ASRS thanks the committee for holding this hearing to investigate this issue. We believe Congress shares our goal of providing the nation’s veterans with the highest standard of care and hope it will join us in advocating against allowing optometrists to perform surgical and invasive procedures. We would be happy to provide you with any assistance or additional information you may need. Please contact Allison Madson, vice president of health policy, at allison.madson@asrs.org for assistance.

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