



September 19, 2023

The Honorable Mariannette Miller-Meeks, MD
House Committee on Veterans' Affairs
Subcommittee on Health
364 Cannon House Office Building
Washington, DC 20003

The Honorable Julia Brownley
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Dear Chairwoman Miller-Meeks and Ranking Member Brownley,

On behalf of the thousands of veterans experiencing sight loss, the Blinded Veterans Association (BVA) want to thank you for holding today's hearing, entitled, "*VA's Federal Supremacy Initiative: Putting Veterans First?*". We specifically wish to express our concern with the approach that the Department of Veterans Affairs (VA) appears to be taking in establishing national scope of practice standards, particularly one for VA-employed optometrists.

As the only national Veterans Service Organization (VSO) chartered by the United States Congress that is exclusively dedicated to assisting veterans and their families coping with blindness and vision loss, ensuring that our nation's veterans have access to the highest quality eye care is a top priority for the BVA. While we appreciate VA's efforts to protect and boost access to needed health care services, including eye and vision care services, **our organization strongly believes that VA should not establish a standard that could lower the standard of care, particularly for surgical eye care services, available to veterans.**

Our members know all too well that eye tissue is extremely delicate, and once damaged, it is often impossible to fix. While optometrists play an important role in addressing the eye care needs of veterans, they are not medical doctors who have the training and experience needed to perform invasive surgical procedures. While some procedures are higher risk than others, no invasive procedures are without risk, particularly when performed by inexperienced providers.

Veterans have benefitted from established, consistent, and high-quality surgical eye care for decades because VA has maintained a long-standing policy that restricts the performance of therapeutic laser eye surgery to ophthalmologists—medical or osteopathic doctors who specialize in eye and vision care— in VA medical facilities. This policy is consistent with the standard of medical care in the overwhelming majority of states. It also ensures that there is a system-wide quality standard for surgical eye care and that all veterans have access to the eye care provider with the appropriate education, training, and professional experience needed to perform their eye surgery.

We are very concerned that VA has been developing its national standard of practice (NSP) for optometry without including all critical perspectives necessary to maintain the high-quality eye care our nation's veterans have earned. To ensure the safety and well-being of all veterans in need of eye care, especially surgical eye care, we have been urging VA to fully and equally engage all providers on the eye care team as its standards are being drafted and before any draft national standards are released for public comment.

Much of eye-related care is provided in a team-based approach, and only by hearing from all clinicians involved in that team will VA truly be able to understand the full breadth of services that are provided to veterans, and which types of clinicians are best trained and most equipped to furnish these services.

Unfortunately, we have heard that in the development process of the optometry national standard of practice that VA has not yet fully received or incorporated feedback from ophthalmologists.

Ophthalmologists, due to their extensive training and clinical experience, have a unique perspective on the types of services that veterans may require. They are also routinely the leaders of the clinician teams that provide eye-related services, and their feedback is critical when determining what services should be included in the scope of practice standards for all eye-care providers, including optometrists.

We strongly recommend that VA include ophthalmologists on the teams and workgroups preparing the optometry national standard of practice. We urge you and your Subcommittee members to work together to ensure that the VA takes the appropriate actions to implement our recommendation.

Clinical experience matters, and optometrists do not have the necessary level of medical education or surgical training to be a surgeon. BVA recognizes that optometrists play a very critical role in delivering quality eye health care for our nation's veterans. However, BVA strongly believes that optometrists should not be allowed to perform eye surgery on veterans. Optometrists categorically do not have the requisite training to do so.

One reason we are so concerned about the future of veterans' surgical eye care is that it has come to our attention that in September 2022, VA modified its Community Care "Standardized Episode of Care (SEOC): Eye Care Comprehensive" guideline by removing language that has provided that "only ophthalmologists can perform invasive procedures, including injections, lasers, and eye surgery." By removing this sentence, VA has authorized private sector optometrists to perform ophthalmic surgery on veterans referred under the Community Care program in the few states where permitted by state licensure laws. VA removed this language without any opportunity for the veteran community and public at large to comment.

BVA is extremely concerned that VA has removed an important patient safeguard, posing increased risk to veterans requiring surgical eye care. We have urged VA to immediately reinstate the following language back into the SEOC: "only ophthalmologists can perform invasive procedures, including injections, lasers, and eye surgery." To date, VA has not acted on our recommendation.

Thank you for the opportunity to provide our comments regarding VA's effort to establish national scope of practice standards and their potential effect on our nation's veterans. Should you have any questions or require any further information, please do not hesitate to contact Donald D. Overton, Jr. (Executive Director) via email: doverton@bva.org.

Sincerely,



Donald D. Overton, Jr.
Executive Director