



March 15, 2017

The Honorable Pete Kelly
Chairman
Alaska State Senate Finance Committee
State Capitol
Room 111
Juneau, Alaska 99801

Dear Chairman Kelly:

The American Osteopathic Association (AOA) and the Alaska Osteopathic Medical Association (AKOMA) are writing to encourage you to oppose SB 36. This bill would allow optometrists to prescribe and administer pharmaceutical agents, including controlled substances, for the treatment of eye disease. The bill also allows the Board of Examiners in Optometry (Board) to adopt regulations describing the scope of practice for a licensee to perform ophthalmic surgery and noninvasive procedures. This scope of practice expansion fails to include adequate changes in education, training or competency demonstration requirements for optometrists, and we are concerned that the passage of this bill could ultimately put the health and safety of Alaska patients at risk.

The AOA represents nearly 130,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs/osteopathic medicine can be found at www.osteopathic.org. AKOMA is a professional medical organization that represents over 200 DOs providing patient care in Alaska.

The AOA supports the “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. While we value the contributions of optometrists to the health care delivery system, we believe any expansion of their authority to provide services to patients without appropriate oversight should be directly related to additional education, training and competency demonstration requirements. This bill does not satisfy these concerns as it does not provide sufficient education in order to prescribe a controlled substance or perform surgical procedures.

Although optometry and ophthalmology share similar names and subject matter, they are significantly different. An optometrist holds a doctorate degree and a license to practice optometry, while an ophthalmologist is a specialized physician with a DO or MD degree and a license to

practice medicine. Historically, only physicians have been permitted to prescribe potentially dangerous controlled substances, due to the risk that poor prescribing practices will harm patients.

Osteopathic ophthalmologist medical education includes:

- **Four years of medical school**, which includes two years of didactic study totaling upwards of **750 lecture/practice learning hours** just within the first two years, plus two more years of clinical rotations done in community hospitals, major medical centers and doctors' offices.
- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.
- Alaska-licensed physicians must complete **50 continuing medical education hours** per two-year renewal period.

Optometrist education includes:

- Generally includes a doctorate-level degree in optometry, **110 combined hours of course work and clinical training** in general and ocular pharmacology, **one year of supervised experience**, and the completion of **a two hour course in preventing medical errors**.
- Optometry programs in the United States and Canada require clinical training for their students during their final academic year; however, the **length is unspecified**.
- **Typical clinical experiences vary in length from only 8 to 16 weeks**.

Optometry in Alaska:

- Currently, optometrists in Alaska are **prohibited from prescribing Schedule IA, IIA or VIA controlled substances**, and from prescribing other controlled substances in quantities that exceed four days of prescribed use, because their **lack of education and training in this area could pose a potential danger to patient safety**.
- This bill would delete these provisions and **allow optometrists to prescribe pharmaceutical agents**, including controlled substances, without time restrictions, in accordance with **standards to be adopted by the Board, which is comprised of optometrists and one public member**.
- The bill also allows the Board to **create regulations regarding optometrists' authority to perform surgery**.

Optometrists are not physicians, and lack the education, training or certification to safely perform surgical procedures or prescribe controlled substances. In addition, expanding their prescribing authority to cover all controlled substances would come at a time when many states are moving to place greater restrictions on physicians prescribing controlled substances due to their high potential for abuse, misuse and diversion. Further, permitting a Board comprised of other optometrists, without any physician representation, to determine the limits of this scope expansion runs contrary to the State's obligation to protect the public.

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We urge you to protect the safety of Alaska's patients by opposing SB 36. Should you need any additional information, please feel free to contact Nick Schilligo, MS, Associate Vice President, State Government Affairs at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



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President, AOA



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