



Indiana Academy of OPHTHALMOLOGY

December 14, 2023

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Re: LSA Document #23-737

On behalf of the Indiana Academy of Ophthalmology, we submit the following comments in opposition to proposed changes to the rules of the Indiana Optometry Board, in particular section 852 IAC 1-16-4.1 Standards for approval for optometric legend drug continuing education hours. Under subsection (d) Courses approved by COPE in the following areas are automatically approved for optometric legend drug or therapeutic continuing education: There are three new categories added: (9) Injection skills (IS). (10) Laser procedures (LP). (11) Surgery procedures (SP).

Since none of the proposed additional procedures are a part of the optometric scope of practice, it is unreasonable to assume that education on those procedures would count towards continuing education for optometrists particularly as it applies to their prescriptive authority. Providing these topics of continuing education is likely to lead to confusion on which procedures Indiana optometrists are and are not authorized to perform.

Patient safety is the number one concern of the Indiana Academy of Ophthalmology. The performance of ocular injections, laser application and surgery of the eye demands sound medical expertise and judgment, not just technical skills. A key component of surgery is determining who needs to have a procedure done and who does not. This takes years of learning from an experienced surgeon. It involves patient selection. It involves education of the patient. It involves being able to identify complications and being able to manage those complications. Most of the complications of these procedures are outside the purview of optometry.

In conclusion, the Indiana Academy of Ophthalmology opposes the addition of these procedures to the allowed topics for prescriptive authority by Indiana optometrists.

Sincerely,

Jeffrey Hudson, MD, IAO President
Derek Sprunger, MD, IAO Legislative Committee Chair
Kimberly Williams, IAO Executive Director