



December 27, 2023

Toby Snell  
Indiana Optometry Board (IOB)  
Indiana Professional Licensing Agency  
402 West Washington Street, Room W072  
Indianapolis, IN 46204

RE: Comment on Proposed Rule, LSA Document #23-737

Dear Members of the Indiana Optometry Board:

The Indiana Optometric Association (Indiana Optometry) has advocated for Indiana optometrists since 1897. We are dedicated to actively supporting Indiana Doctors of Optometry in their care of Hoosier patients. Indiana optometrists all pledge to keep patient care and safety as a top priority in clinical care. As the professional representatives of the majority of Indiana optometrists, we would like to submit several comments on the proposed Indiana Optometry Board rule changes.

Regarding **852 IAC 1-16-7(c)** we have concerns regarding the increase from 8 to 15 self-study hours. It is unclear as to the reason the board would like to increase the self-study hours since this encompasses all self-study, not just online learning. Although there is anecdotal evidence that live, in-person education is not in all cases the most efficient information delivery system for particular individuals, there is a substantial and growing amount of evidence that self-study learning systems are not as effective as live systems, especially in light of evidence gathered by the education system during and after the COVID-19 pandemic.

Indiana optometrists are already doing more than other medical professionals as it pertains to continuing education (CE). We continue to have excellent patient satisfaction and clinical outcomes in this state, and the public trusts us. Without clear evidence that nearly doubling the number of self-study continuing education hours benefits the education of Indiana optometrists, and without evidence that it benefits the public, the increase from 8 to 15 self-study hours seems arbitrary.

This board determines what qualifies as continuing education for optometrists and what entities are entrusted to provide quality CE. The Indiana Optometric Association and the Indiana University School of Optometry are two of these approved entities, for example. When self-study continuing education does not come from an approved entity, then this board must review it for content and appropriateness before approval. Nearly doubling the number of allowed self-study hours places a significant increase in burden on the optometry board for ensuring standards are met for course content. Without justifiable reasons for the significant expansion of self-study hours, the IOA has concern over significant expansion of these hours beyond twenty-five percent of total CE hours. We would support expansion to ten hours of self-study. Additionally, we would encourage the board to explore options to include virtual synchronous CE.



PAGE 2

December 27, 2023

Regarding self-study continuing education post-testing, **852 IAC 1-16-7(b)**, the addition of "...with a passing score determined by the continuing education provider" lacks a minimum standard which should be set by the Board. We recommend this be changed to "with a passing score of 70%". It is presumed that this board understands that self-study post-testing, without further regulation, will present as highly variable with regard to difficulty and course relevancy. We agree that course providers should have some flexibility to determine an appropriate passing score in order to relieve some burden from this board. However, providing no guidance on minimum testing standards at best causes the Indiana Optometry Board to cede an amount of control over continuing education to outside groups, and at worst provides an opportunity for meaningless post-testing. Providing a minimum passing score places some burden on course providers to better establish test relevancy.

Finally, regarding **852 IAC 1-16-4.1(d)** Courses approved by COPE in the areas automatically approved for optometric legend drug or therapeutic continuing education, the Indiana Optometric Association supports the addition of three areas of approved COPE courses to the list of automatically approved courses. An increase in knowledge base by individual health care providers should be encouraged and never withheld or discouraged.

Sincerely,

James S. Stickel, O.D.

President, Indiana Optometric Association