

April 19, 2023

The Honorable Denis McDonough  
Secretary  
U.S. Department of Veterans Affairs  
810 Vermont Avenue NW, Room 1063B  
Washington, DC 20420

**RE: National Standards of Practice, Optometry**

Dear Secretary McDonough:

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, and writes today with deep concern about a potential, unprecedented scope of practice expansion for optometrists providing care in VA facilities.

We are aware that the VA is currently developing standards of practice for numerous allied health professionals providing necessary care to veterans in VA facilities. While the optometry standards have yet to be published, we fear that they will propose to allow optometrists to perform invasive surgical procedures that are currently only performed by retina specialists and other ophthalmologists. **We strongly urge you to protect veterans' eyesight and prevent optometrists from performing lasers and other eye surgeries that are not part of their standard training on veterans.**

Retina specialists, like other ophthalmologists, have completed four years of medical school, a hospital residency, 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.

We believe our fears are not unfounded due to a decision by the VA in September 2022 to remove 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 your intervention.

Empowering untrained optometrists to perform surgical procedures would be an unprecedented break with current standards of care. We strongly encourage you to ensure that, when published, the standards for optometry adhere to widely-accepted practice and recommend the changes to the Community Care guidelines be reversed immediately as well.

The nation’s veterans have already risked their lives to defend our country. Subjecting them to invasive care from unqualified practitioners puts their eyesight at unnecessary risk and deprives them of the high standard of care they have earned through their service.

We appreciate your attention to this matter and 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](mailto:allison.madson@asrs.org) for assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Judy E. Kim". The signature is fluid and cursive, with the first name "Judy" being the most prominent.

Judy E. Kim, MD, FASRS  
President

CC: Shereef Elnahal, MD; Under Secretary for Health