

May 9, 2025

The Honorable Donna Bailey
Senate Chair
Joint Standing Committee on Health Coverage,
Insurance & Financial Services
Room 220, Cross State Office Building
Augusta, ME 04330

The Honorable Kristi Mathieson
House Chair
Joint Standing Committee on Health Coverage,
Insurance & Financial Services
Room 220, Cross State Office Building
Augusta, ME 04330

Re: AMA Opposition to LD 1803

Dear Chair Bailey and Chair Mathieson:

On behalf of the physician and student members of the American Medical Association (AMA), I am writing to express our **strong opposition to Legislative Document 1803 (LD 1803)**, which would allow optometrists to perform a wide range of complex surgical procedures. Patient safety and quality of care demand that patients be assured that individuals who perform invasive procedures, including eye surgery, have the appropriate medical education and training to do so. Optometrists are important members of the health care team, but they do **not** have the education, training, or experience to perform any type of surgery, including scalpel or laser surgery involving the eye or tissues surrounding the eye. Allowing optometrists to perform the procedures described in LD 1803 would pose a serious threat to the safety of patients in Maine. **As such, the AMA strongly encourages the Joint Standing Committee on Health Coverage, Insurance, and Financial Services to oppose this legislation.**

Eye surgery is invasive and complicated and must be taken seriously

Surgery on or around the human eye is not something to be taken lightly. As drafted, LD 1803 would allow optometrists to perform a wide range of serious and risk-laden surgical procedures, including scalpel and laser surgery, as well as injections in and around the eye. The AMA defines surgery as the diagnostic or therapeutic treatment of conditions or disease processes by any instruments causing localized alteration or transposition of live human tissue, which **include lasers, ultrasound, ionizing radiation, scalpels, probes, and needles**. Surgery in and around the eye is laden with potential risks including irreversible loss of one's eyesight. Optometrists do not have the training to perform these delicate procedures or address potential side effects or complications that can occur during or after these procedures. To protect the vision of patients in the great state of Maine, we implore you to maintain the current optometric scope of practice in Maine and oppose LD 1803.

Protect the safety of patients in Maine

The foundational reason for the AMA's concern with this legislation is patient safety. The scope of practice of every health care professional must be based on their education, training, and competency. Optometrists are important members of the health care team, but they are not interchangeable with ophthalmologists as is evident by the vast difference in their education and training. Ophthalmologists' training includes four years of medical education and an additional four-to-six years in postgraduate residencies and fellowships. During that advanced training, physicians learn the most effective, safe, and

appropriate treatments, including surgical, pharmacologic, and other interventions based on each patient's unique medical needs. Ophthalmologists' advanced training includes not only the technical skills needed to perform the procedure itself, but also the medical knowledge needed to analyze when surgery may or may not be clinically indicated. This training also provides ophthalmologists with the whole-body medical acumen necessary to immediately address potential medical complications that may arise during or after surgery.

In sharp contrast, non-physician optometric education and training rarely go beyond the postgraduate level and are focused almost entirely on examining the eye for vision prescription, dispensing corrective lenses, and performing some eye screening functions. Optometrists do not have the comprehensive medical knowledge necessary to safely perform surgical procedures that would be permitted should LD 1803 become law. Finally, optometrists lack the whole-body acumen gained by ophthalmologists due to the breadth and depth of their medical training. This skill is especially important when treating some of our most vulnerable patients – children and the elderly, as well as those with complex medical conditions. Optometrists' lack of training to treat the whole-body should result in rejection of LD 1803 on its face.

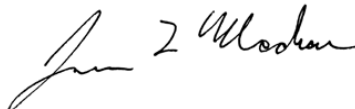
Vulnerable patients need you to keep Maine's common sense state laws in place and reject LD 1803

As lawmakers, we implore you to stand up for your constituents, especially those that are most vulnerable. We know based on surveys that patients are often confused about the education and training of the health care professional who is providing their care. It is common for patients to erroneously believe optometrists are medical doctors (MDs or DOs) and, therefore, believe that optometrists have the same level of skill and training as ophthalmologists. As described, this is simply not true. The two professions are not interchangeable. Common sense dictates that allowing optometrists to perform surgical procedures, as outlined in LD 1803, will further confuse the public and put patients' eyes – their vision – at great risk.

For these reasons, the AMA **strongly opposes LD 1803**. There is no way to safely perform surgical procedures without the comprehensive education and years of clinical training received in medical or osteopathic school. We believe that LD 1803 would set a dangerous precedent for Maine's patients, your constituents, who deserve the highest quality health eye care. When it comes to eye surgery and safeguarding the vision of patients, it is crucial that only ophthalmologists are allowed to perform surgery – ensuring the best outcomes for patients. As such, we strongly urge you to protect the vision of Maine's patients and oppose LD 1803.

Thank you for your consideration. If you have any questions, please contact Kim Horvath, JD, Senior Attorney, AMA Advocacy Resource Center, at kimberly.horvath@ama-assn.org.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Madara".

James L. Madara, MD

cc: Maine Medical Association