

The Honorable Donna Bailey and Kristi Mathieson
Chairs, Committee on Health Coverage, Insurance and Financial Services
Maine Legislature
Maine State House
2 State House Station
Augusta, ME 04333

May 10, 2025

Dear Chairs Bailey and Mathieson, and Members of the Committee,

I am providing this written testimony to provide clarity relative to the educational background necessary to achieve the Doctor of Optometry degree in North America. I am the current Chair of the Accreditation Council on Optometric Education and have been in that role for the past 3 years.

Safeguards exist in all professional education systems to assure the public that all graduates from accredited programs in optometry (just like every other profession) possess the knowledge base, skill set, and supervised experience that prepares them for clinical practice in the United States.

It is reasonable for legislatures to limit practitioners' scope of practice to that which is supported by the educational content of their degree program. However, many legislators do not have the background or experience to judge the adequacy of education underlying clinical practice. Rather than rely on political arguments of conflicted parties to discern whether a practitioner group is qualified by education for a particular scope of practice, there is an impartial system complete with the necessary expertise, and multi-level oversight, that assures the adequacy of every clinical degree program that everyone can depend on. The process that ensures that educational content supports the clinical practice of every provider in every specialty is the accreditation process.

Educational adequacy is determined by accreditation bodies that certify the educational quality underlying the granting of any degree. The general educational quality of schools, colleges and universities is assured by regional (AKA, institutional) accreditors. Specific educational programs (such as dental, optometric, osteopathic, allopathic, podiatric, or chiropractic) at any institution are also accredited by a programmatic accreditation body. Programmatic accreditation bodies are specific to the degree they accredit and are responsible for creating and maintaining the educational standards applicable to it. They also ensure that accredited programs granting a specific degree adhere to the educational standards for that degree. All accreditation organizations are themselves subject to accreditation by groups (USDE, CHEA) that assure they are appropriately doing their jobs of creating and maintaining appropriate educational standards and ensuring educational programs adhere to those standards. Therefore, the public (including legislators) can trust that those who attain a degree from an accredited program have been taught the knowledge base and skill sets that their degree requires, and that they are educationally eligible for the next step. The next step may be residency training in the case of MD/DO degrees, or licensure testing in the case of OD, DDS/DMD, DPM, and DC degrees covering the specialties of optometry, dentistry, podiatry, and chiropractic.

The Accreditation Council for Optometric Education (ACOE) is the specific accreditation organization recognized by the US Dept of Education (USDE) and Council on Higher Education Accreditation (CHEA) as the only programmatic accreditor of optometric education programs. ACOE's scope of accreditation covers optometric degree granting programs (OD degree), optometric residency education, and optometric technician education programs. When considering legislation that looks to the adequacy of education to support scope of practice it should be known that the ACOE requires programs to have a curriculum that prepares graduates to independently practice contemporary optometry. Previous versions of the standards, allowed programs to have some discretion as to how to define 'contemporary optometry.' However, the ACOE recently updated its Standards and developed a definition for 'contemporary optometry'. All professional optometric degree programs undergoing an accreditation review January 1, 2025, or later, will

be assessed to the new Standards that reference the ACOE's definition of contemporary optometry. ACOE's definition of contemporary optometry is:

The evidence-based clinical practice of optometry as the primary healthcare practitioner of the eye and visual system who provides comprehensive eye and vision care. Contemporary optometry includes evaluation/diagnosis and treatment/management of refractive conditions, diseases of the eye and associated systems, and rehabilitation, normalization, and enhancement of the visual system. This definition includes performance of procedures that are allowable in at least 10% of states' scope of practice.

Therefore, all ACOE accredited programs will provide training for advanced procedures including minor lid procedures and optometric laser procedures within their curriculum, and new technologies and procedures that are part of the scope of practice of 5 or more states will automatically be included as requirements. This provides an automatic update to requirements within the curriculum of all optometric degree programs so that "as taught" legislation will be continuously supported by the education of emerging practitioners. As institutions need time to prepare new curriculum content, provide space and develop expertise in emerging technologies, there is an integration between scope of practice and the curricular expectations that respects the reality of how new medical devices and procedures are developed, scientifically vetted, and implemented into clinical practice.

In summary, there are robust systems in place at every step in the system that produces physicians of every variety, including optometric. Educational programs are accredited to ensure compliance with specific educational standards to be eligible for licensure. Licensure is state controlled and guarantees practitioners' competency before providing services to the citizens of that state. After licensure the regulatory board of that specialty monitors their compliance with the practice act including continuing education requirements to insure continued competency. This entire system applies to each of the degrees that train individuals to provide care in each state.

Respectfully submitted,



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