



American Board of Medical Specialties

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American Board of Medical Specialties

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BY ELECTRONIC MAIL

May 13, 2025

The Honorable Donna Bailey & The Honorable Lori K. Gramlich
Chairpersons, Joint Committee on Health Coverage, Insurance and Financial Services
Maine State House
2 State House Station
Augusta, ME 04333

Re: Specialty Board Concerns with LD 1803

Dear Chairpersons Bailey and Gramlich and Members of the Joint Committee on Health Coverage, Insurance and Financial Services:

As President and Chief Executive Officer of the American Board of Medical Specialties (ABMS), I am writing to express my concerns regarding LD 1803. Specifically, the bill's provisions that allow non-physicians to independently practice specialty eye care, which undermines the critical role physicians play within a care team. Physicians undergo extensive clinical training and rigorous certification programs that far exceed those of other health professions in areas such as diagnosis, prescribing, and treatment that patients rely on for safe and effective health care.

The ABMS is responsible for the creation of standards overseeing physician certification in the United States. Dedicated to improving the quality of care to the patients, families, and communities they serve, the [24 ABMS Member Boards](#) develop educational and professional standards and programs of assessment to certify physicians and medical specialists. More than 997,000 physicians and medical specialists are certified by one or more of the ABMS Member Boards in one or more of 38 specialties and 89 subspecialties.

A board certified ophthalmologist must finish four years of premedical education in a college or university; earn a medical degree (MD, DO) from a qualified medical school; complete 12,000-16,000 hours of clinical training focused on diagnosis, treatment, and eye surgery for complex conditions; and pass both a written and oral examination created and administered by the American Board of Ophthalmology (ABO), an ABMS Member Board.

Requirements to maintain certification through the ABO include regular assessment of knowledge and cognitive skills, completion of specialty-specific continuing education, and adherence to professionalism standards and policies. As medical science continues to rapidly evolve, collaboration with board certified physicians on the care team is vital to ensure patients have access to the most current evidence-based practices and up-to-date

knowledge of the specialty. Optometry training programs are not equivalent, typically requiring four years of postgraduate education and one year of clinical rotations. Additionally, they lack substantive clinical training to manage diseases that affect the entire body and have limited exposure to surgical training.¹


While the intent of this legislation aims to expand patient care availability, the provisions allowing non-physicians to perform certain eye surgeries, for example, are concerning and undermine the trust and quality of specialty care for Maine residents. ABMS Member Board programs are designed to ensure patients can trust that their physician is up to date in their field and properly trained to deliver specialty care. LD 1803 threatens to undermine the important role that specialty certification plays in protecting patients.

Ophthalmologists are the only eye care providers with the necessary clinical training to safely perform eye surgery. Their training also positions them to diagnose and treat a wider range of conditions. Ophthalmologists and optometrists often collaborate to provide team-based care within the same office, ensuring appropriate oversight by a trained medical physician. While optometrists play a vital role in the health care system, they lack the same level of medical knowledge and experience necessary to safely deliver the same high-quality care as specialty physicians.

In conclusion, I commend your efforts to expand health care access for Maine residents. However, by replacing providers with insufficient training and experience, I fear that LD 1803 compromises patient safety and exposes them to underqualified care. Please safeguard patient trust in high-quality specialty care and vote no on LD 1803.

For more information, please contact Charlie Sheffield, Vice President of Government Affairs, at csheffield@abms.org Thank you for your consideration of these comments.

Sincerely,



Richard E. Hawkins, MD
President and Chief Executive Officer

¹ [Protect Access to Physician-led Care: Optometrists | AMA](#)