

May 9, 2025

The Honorable Donna Bailey  
Senate Chair  
Health Coverage, Insurance & Financial  
Services Committee  
Maine Legislature  
Cross Building, Rm 220  
Augusta, ME 04333

The Honorable Kristi Mathieson  
House Chair  
Health Coverage, Insurance & Financial  
Services Committee  
Maine Legislature  
Cross Building, Rm 220  
Augusta, ME 04333

**Re: Opposition to LD 1803, an Act to Amend the Laws Governing Optometric Practice**

Dear Chairs Bailey and Mathieson,

On behalf of the American Society of Retina Specialists (ASRS), we are writing to ask you to oppose LD 1803. This legislation would inappropriately and dangerously authorize optometrists to perform laser surgeries, invasive intraocular procedures and administer light therapy at frequencies known to alter the cells in the retina. This legislation would lower the quality and safety of eye care and needlessly put Mainers at risk of irreversible damage to the retina and other vision-threatening complications.

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.

Ophthalmologists have completed four years of medical school, a hospital residency, and three years of ophthalmology residency training. Retina specialists then go on to complete an additional 1-2 year retina fellowship. During their education, ophthalmologists receive extensive one-on-one training in delicate and complex surgical techniques on live patients. This training includes managing potential complications—both ocular and systemic. Even the seemingly most “non-invasive” procedures carry the risk of serious complications, including irreversible blindness.

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 LD 1803 would prohibit optometrists from performing certain ocular procedures, it does not set any minimum standard of education or training for the permitted procedures. Furthermore, it would grant the state board of optometry—a body that includes no

ophthalmologists who currently perform surgery—sole authority to set terms and criteria for licensure. Neither optometrists, nor the board overseeing their licensure, have the training or experience to perform or set educational standards for any ophthalmic procedure.

**Most importantly, were an optometrist without adequate training to perform these surgical procedures, the complication rate would increase significantly, putting the safety and vision of Mainers at risk.**

Therefore, we urge you to oppose LD 1803.

Thank you for your consideration. If you need additional information or have questions, please contact Allison Madson, Vice President of Health Policy, at [allison.madson@asrs.org](mailto:allison.madson@asrs.org).

Sincerely,

A handwritten signature in black ink, appearing to read "J. Michael Jumper", with a stylized flourish at the end.

J. Michael Jumper, MD, FASRS  
President