

February 5, 2018

The Honorable Roby Smith, *Chair*
The Honorable Tony Bisignano, *Ranking Member*
Committee on State Government
Iowa State Senate
Des Moines, IA 50319

RE: In opposition to S.F. 437

Dear Chairman Smith and Ranking Member Bisignano:

I am writing on behalf of the American Society of Plastic Surgeons (ASPS) regarding Senate File 437. ASPS is the largest association of plastic surgeons in the world, representing more than 94 percent of all board-certified plastic surgeons in the United States. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety.

As surgeons, we encourage you to maintain the high level of patient care that has been established and maintain current standards that permit only licensed Medical Doctors (MD) or Doctors of Osteopathic Medicine (DO) who meet appropriate education, training, and professional standards to perform surgery in the ocular region. If passed, S.F. 437 would allow non-physician optometrists to administer injections and perform surgical procedures in the ocular region. These procedures fall squarely within the practice of medicine.

When optometric scope of practice is improperly expanded, patients suffer. Sadly, in 2009, several patients at a VA facility received inadequate treatment for glaucoma from optometrists. An investigation found that as a result of the poor treatment 22 patients were found to have progressive vision loss.¹ Unfortunately, this was not an isolated incident.

Ophthalmologists and plastic surgeons must attain a core medical and surgical education while completing seven to ten years of training, which includes increasing responsibility and decision-making authority in the hospital setting. Board-certified plastic surgeons must: (1) earn a medical degree; (2) complete three to six years of full-time experience in a residency training program accredited by the Accreditation Council for Graduate Medical Education (ACGME); and (3) the last three years of training must be completed in the same program. Similar to the rigorous training requirements that plastic surgeons complete, ophthalmologists must undergo extensive training in order to perform surgical procedures. It is through this depth and duration of residency training that they learn how to perform complex surgical procedures.

However, optometrists – who are not medical doctors – only complete four to five years of education with significantly less clinical exposure and responsibility, and are not required to undergo postgraduate training. Optometrists, unlike plastic surgeons and ophthalmologists, are not surgically trained during optometry school. Allowing optometrists to practice medicine and perform surgical procedures without

¹ Dremann, Sue. VA investigates glaucoma patients' treatment: 'Exhaustive' internal review found inadequate referrals; optometry chief sidelined. Palo Alto Weekly, July 23, 2009.

the requisite medical school and residency training would jeopardize patient safety and lower the standard of care in Iowa.

Due to patient safety issues, such as the possibility of complications arising from surgery and serious risk of vision loss, it is critical that such procedures are performed by physician surgeons who have the comprehensive training and board certification to handle those complications when they do occur. Thank you for your consideration of our position on this important issue. Please do not hesitate to contact Patrick Hermes, Director of Advocacy and Government Relations, at phermes@plasticsurgery.org or (847) 228-3331 with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey E. Janis". The signature is fluid and cursive, with a large initial "J" and "E".

Jeffrey E. Janis, MD, FACS
President, American Society of Plastic Surgeons

cc: Members, Senate Committee on State Government