

February 12, 2018

The Honorable Don Harmon, *Co-Chairman*
The Honorable Keith Wheeler, *Co-Chairman*
Joint Committee on Administrative Rules
Illinois General Assembly
700 Stratton Building
Springfield, IL 62706

RE: In opposition to proposed changes to 68 Ill. Adm. Code 1320

Dear Co-Chairman Harmon and Co-Chairman Wheeler:

As constituents and practicing physicians, we are writing on behalf of the 269 Illinois board-certified plastic surgeons and members 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, the changes to 68 Ill. Adm. Code 1320 would allow non-physician optometrists to perform up to seven different surgical procedures and three types of injections in the ocular region. These procedures fall squarely within the practice of medicine and surgery.

It is outside of the Illinois Department of Financial and Professional Regulation's purview to act unilaterally to determine optometric scope of practice in the state, especially considering the fact that – as you are aware – the Illinois General Assembly already renewed the Optometric Practice Act in 2016 without permitting optometrists to perform surgical procedures. Furthermore, the Optometric Practice Act specifically prohibits surgery to be performed by optometrists and only lists one type of medication that optometrists are allowed to administer via injection (in order to treat anaphylactic shock).

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

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

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

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,

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cc: Members, Joint Committee on Administrative Rules