

January 24, 2018

The Honorable Stephen D. Newman, *Chairman*  
Committee on Education and Health  
Virginia State Senate  
Senate Room A, Pocahontas Bldg.  
Richmond, VA 23219

**RE: S.B. 511**

Dear Chairman Newman:

On behalf of the Virginia Society of Plastic Surgeons (VSPS) and the American Society of Plastic Surgeons (ASPS), we are writing in opposition to S.B. 511. The Virginia Society of Plastic Surgeons is the largest association of plastic surgeons in Virginia, and in conjunction with our national affiliate the American Society of Plastic Surgeons, collectively represent 192 board-certified plastic surgeons in the state. 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.B. 511 would allow non-physician optometrists to evaluate, examine, diagnose, and treat abnormal or diseased conditions of the human eye and its adnexa by the use of medically-recognized and appropriate devices, procedures, or technologies. Furthermore, the measure allows optometrists to perform surgery to treat styes, chalazia, or anterior segment lesions. This includes procedures that 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.<sup>1</sup> 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,

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

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 Virginia.

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 positions on these important issues. Please do not hesitate to contact Patrick Hermes, Director of Advocacy and Government Relations, at [pghermes@plasticsurgery.org](mailto:pghermes@plasticsurgery.org) or (847) 228-3331 with any questions or concerns.

Sincerely,

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

Henry Wilson, MD, FACS  
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Virginia Society of Plastic Surgeons

Saied Asfa, MD, FACS  
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cc: Members, Virginia State Senate Committee on Education and Health