

July 18, 2016

Honorable Robert DeLeo, Speaker of the House  
Office of the Speaker, State House Room 356  
Boston, Massachusetts 02133

Honorable Brian Dempsey, Chairman  
House Committee on Ways and Means  
State House Room 243  
Boston, Massachusetts 02133

**RE: S 2334, An Act Relative to the Modernization of Optometric Patient Care**

Dear Speaker DeLeo and Chairman Dempsey,

It is with great concern for the over 6 million people of the Commonwealth of Massachusetts whose eye care and vision health are of paramount importance that I write to you today, as President of the American Optometric Association (AOA) representing over 33,000 doctors and students of optometry, urging your strong support of S 2334. S 2334 will provide long overdue and much needed access to medical eye care for families around the Commonwealth by eliminating the harmful and out-of-date restrictions preventing Doctors of Optometry from utilizing their extensive medical eye care training to treat their patients who suffer from glaucoma.

As you know, Massachusetts remains the only jurisdiction in the United States that denies statutory privileges allowing glaucoma treatment by Doctors of Optometry. In Massachusetts alone, there are over 58,000 people who are diagnosed with glaucoma. Qualified Doctors of Optometry stand ready on the front line of primary eye care to deliver competent and timely eye care, which will minimize the devastating impact of permanent vision loss for these people. Regrettably, over 1,500 licensed Doctors of Optometry have their hands legally bound from offering services so badly needed by families all across the Commonwealth. As a result, every day there are missed opportunities for early treatment of glaucoma.

Although Boston is the epicenter of medical care, many parts of the state are rural. Individuals with glaucoma are required to travel, often dependent on others due to their visual impairment, to the larger cities where ophthalmologists practice. Even if transportation is not a challenge for the patient, patients who are diagnosed with glaucoma by their optometrists, must wait weeks and often months before they are able to obtain an appointment with an ophthalmologist for treatment. Unfortunately, because glaucoma is asymptomatic in the early stages, some patients neglect to follow through the second appointment and find themselves with substantial disease progression at their next visit in their local optometrist's office. Massachusetts' outdated statute effectively maintains these barriers in access to care.

In addition to being an issue of access to care, these unnecessarily strict scope restrictions limit the supply of qualified eye care providers, which decreases competition and increases the cost of care. As the Federal Trade Commission ("FTC") noted in its February 2016 review of Massachusetts' limitation on optometrists' scope of practice, competition brings important benefits to health care consumers, including contained costs, expanded access and choice, as well as innovation. The FTC acknowledged the value that optometrists in Massachusetts can provide in enabling more patients to obtain and maintain glaucoma



treatment. As you know, the FTC encouraged the legislature to eliminate Massachusetts' restriction on optometrists' scope of practice, noting that unwarranted restrictions reduce patient access, raise costs and foreclose opportunities for early treatment.

Finally, it is important to note that with Massachusetts being more than 10 years behind the most recent states (and close to 40 years behind other states) that have embraced glaucoma care by optometrists, almost 80% of optometry students educated in the Commonwealth are leaving quickly after graduation. Massachusetts colleges of optometry are seeing a drop in enrollment as the next logical phase following the post-graduate retention drop. Compounded with the fact that newer Doctors of Optometry are leaving the state to practice elsewhere, the seasoned optometrists are retiring. There is no question that these trends will adversely impact the future of high value primary eye care in the Commonwealth – especially in rural and underserved areas where city-based ophthalmologic care is simply not a feasible option.

Accordingly, the AOA urges you to advance S 2334 to the Governor's desk. Your support will help to ensure that Massachusetts families no longer face needless delays and denials in accessing essential eye care as it is currently provided, safely and effectively, everywhere else around the country. If you have any questions or comments, please contact Daniel Carey from the AOA at [dcarey@aoa.org](mailto:dcarey@aoa.org) or at 703-837-1343.

Sincerely,

A handwritten signature in cursive script that reads "Andrea P. Thau, O.D." with a small flourish at the end.

Andrea Thau, O.D.  
President, American Optometric Association

Cc:  
His Excellency Charlie Baker, Governor of Massachusetts  
Honorable Karyn Polito, Lieutenant Governor of Massachusetts