



November 3, 2022

The Honorable Shereef Elnahal, M.D.
Under Secretary for Health
U.S. Department of Veterans Affairs
810 Vermont Avenue NW, Room 800
Washington, DC 20420

Dear Dr. Elnahal:

On behalf of the membership of the Blinded Veterans Association (BVA), the only congressionally chartered Veterans Service Organization exclusively dedicated to serving our nation's blinded veterans and their families, we express our concern about changes we believe that the Veterans Health Administration (VHA) has made to its Community Care "Standardized Episode of Care (SEOC): Eye Care Comprehensive" guidelines.

We believe that the modification made to the guidelines undermines patient safety and quality, putting our veterans at an increased risk of poor quality of care. We urge VHA to immediately reinstate the following language into the guidelines: "Only ophthalmologists can perform invasive procedures, including injections, lasers, and eye surgery."

It is our understanding that VHA modified this Community Care policy without an opportunity for public or veteran comment, removing language that would impact veterans with eye disease who need injections, lasers, and eye surgery. Such a change could open the door for clinicians other than ophthalmologists, including optometrists, to perform these procedures. This is not the current standard of care in most states. Only a small number of them permit anyone other than an ophthalmologist to perform surgery.

In addition, among the minority of states that authorize optometrists to perform surgical procedures, quality measures vary widely. Many states have no outcomes reporting while others only report adverse outcomes.

BVA members know all too well that eye tissue is extremely delicate and, once damaged, often impossible to restore. While optometrists play an important role in addressing the eye care needs of veterans, they are not medical doctors who have the training and experience needed to perform invasive surgical procedures. While some procedures are higher risk than others, no invasive procedures are without risk, particularly when attempted by inexperienced providers.

Even if VHA intends to defer to state licensure and scope of practice law, removing this standard from its SEOC guidelines will create confusion by implying that someone other than an ophthalmologist, e.g., an optometrist, can perform invasive eye surgery. The modification that VHA made to the guidelines leaves veterans without clear or consistent standards for quality measures for surgical procedures performed by community optometrists. It is paramount that VHA maintain standards of care that protect the health and safety of veterans, and that such standards are broadly recognized throughout the country.

For these reasons and more, BVA requests that VHA immediately reinstate the guideline that “only ophthalmologists can perform invasive procedures, including injections, lasers, and eye surgery” in the SEOC Eye Care Comprehensive guidelines.

If you have questions or need any additional information regarding BVA’s position, please contact me at 202-371-8880, Ext. 305, or at doverton@bva.org .

Respectfully,

A handwritten signature in blue ink, appearing to read "D. Overton, Jr.", written in a cursive style.

Donald D. Overton, Jr.
Executive Director