

September 8, 2022

The Honorable Gavin Newsom
Governor
California State Capitol
1021 O Street, Suite 9000
Sacramento, CA 95814

Re: AMA Request for Veto of A.B. 2236

Dear Governor Newsom:

On behalf of the American Medical Association (AMA) and our physician and student members, I am writing to strongly encourage you to **veto Assembly Bill (A.B.) 2236**. As passed by a single vote in the California Assembly, A.B. 2236 allows optometrists to perform surgical procedures on the eye. Surgery on the human eye is not risk-free nor “uncomplicated.” Complex surgical procedures, such as laser eye surgery and needle injections administered to the eye, as A.B. 2236 would allow optometrists to perform, require specialized education and training, as well as medical supervision during surgical preparation, performance of the procedure, and postoperative patient care. Such training must include not only the technical skills needed to perform the procedure itself, but also the medical knowledge needed to analyze when surgery may or may not be clinically indicated.

Surgery on or around the human eye is not something to be taken lightly. Patient safety and the highest quality of care demand that individuals who perform invasive procedures have the appropriate medical education and training. Ophthalmologists’ training includes four years of medical education and an additional four to six years in postgraduate residencies and fellowships. During that advanced training, physicians learn the most effective, safe, and appropriate treatments, including surgical, pharmacologic, and other interventions based on each patient’s unique medical needs. In sharp contrast, optometric education and training rarely go beyond the postgraduate level and are focused almost entirely on examining the eye for vision prescription, dispensing corrective lenses, and performing some eye screening functions.

Optometrists do not possess the comprehensive medical knowledge necessary to safely perform surgical procedures on patients. Students of optometry are not exposed to standard surgical procedure training, aseptic surgical technique, or medical response to adverse surgical events as a part of their education. In fact, unlike ophthalmologists, optometrists are not required to partake in any postgraduate advanced training (ophthalmologists mandatorily pursue four years of residency training, with some continuing to complete specialty fellowship training), where the knowledge and skills learned during school are clinically applied through actual patient care under the supervision of a licensed professional. This distinction is critical. In short, there is no substitute for the level of experience and education attained by a fully trained ophthalmologist.

While A.B. 2236 was amended to create a certification program which includes additional training requirements for optometrists interested in performing these advanced surgical procedures, this is not a substitute for the level of training of ophthalmologists. The bill also fails to account for the unique and

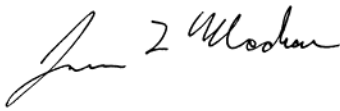
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often more complex medical needs of certain patient populations such as the elderly and children. Simply put, A.B. 2236 falls short in preserving the health and safety of patients in California.

The AMA respectfully **asks you veto A.B. 2236**. There is no way to safely perform surgical procedures without the comprehensive education and years of clinical training received in medical or osteopathic school. We believe that A.B. 2236 would be a dangerous proposition for California's patients and strongly urge your opposition.

Thank you for your consideration. If you have any questions, please contact Kim Horvath, JD, Senior Attorney, AMA Advocacy Resource Center, at kimberly.horvath@ama-assn.org.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim L Madara".

James L. Madara, MD

cc: Jack Resneck, Jr., MD
David H. Aizuss, MD
Toluwalasé A. Ajayi, MD
Drayton Charles Harvey
California Medical Association
California Academy of Eye Physicians and Surgeons