



March 25, 2025

Dear Members of the Health Finance and Policy Committee,

On behalf of the Minnesota Medical Association (MMA), representing more than 10,000 physicians and physicians-in-training across the state, I am writing to share the MMA's opposition to HF 1011, related to optometry scope of practice.

The limits on optometrists conducting sensitive procedures and optometric prescribing currently included in state statute serve a very important purpose in protecting the public. These are very meticulous procedures and very powerful drugs that can have significant long-term negative side effects when administered improperly or for extended periods. Renal function, the body's immune response, respiratory function, and liver function can all be impacted when these drugs are incorrectly prescribed, and long-term consequences related to eyesight are put at severe risk if injections outlined in the legislation are inappropriately administered.

Optometrists are a critical part of the health care team and are well trained to provide many health services related to eyes and eyesight. However, they do not have the same training as physicians, and specifically of ophthalmologists. An ophthalmologist receives significantly more rigorous training through medical school and residency that includes extensive procedural training and training regarding pharmacologic impacts of prescription drugs on the entire body, not just the eye. This extensive training gives ophthalmologists the experience necessary to safely prescribe drugs that can have significant side effects if used improperly. In addition, an optometrist does not have comparable training to conduct procedures outlined in the legislation, and the language **authorizing all forms of drug injections, with the exception of** sub-Tenon, retrobulbar, and intravitreal injections, makes our members particularly uncomfortable and concerned for patient health.

The current statute related to optometric scope of practice is critical for patient safety. I ask that you carefully evaluate the effect this language will have and consider the language in HF 2765 to clarify the definition of surgery in order to better protect Minnesota patients.

Thank you for your consideration.

Sincerely,

Edwin Bogonko, MD
President, Minnesota Medical Association