

# Lowering licensure standards puts Kentuckians' eye health at risk

## The Issue

- Doctors of optometry in the U.S. must pass a three-part board examination to obtain a license. These exams work in sequence to ensure optometrists have the necessary knowledge and skills for safe practice in the U.S. - testing crucial competencies in foundational optometric and biomedical concepts, as well as clinical thinking and decision-making to appropriately diagnose and treat patients.
- Every state in the country requires the National Board of Examiners in Optometry (NBEO<sup>®</sup>) exams and requires ODs to pass NBEO's written exams on applied basic science (Part I) and patient assessment, diagnosis and treatment (Part II). ODs must also pass a performance exam with simulated live patient encounters (Part III).
- Kentucky is on the precipice of becoming the only state in the country to eliminate the requirement that optometrists demonstrate knowledge of the foundational basic science needed to practice optometry in the U.S., by no longer requiring applicants to pass the NBEO Part I exam.
- This change would lower the licensure standards and allow unqualified candidates to receive an optometric license, jeopardizing the health of patients in Kentucky.

## U.S. and Canadian Exams Are Not Equivalent

- The proposed change would allow applicants who do not take or do not pass the NBEO Part I exam to instead submit scores from a Canadian exam that does not test biomedical science, meaning candidates would not be tested on fundamental topics like the basic anatomy of the eyes or scientific principles essential to prescribe safely. The Canadian exam, which is designed for the reduced scope of practice permitted to Canadian optometrists, is not a substitute for the NBEO Part I exam.

## Kentucky's Expanded Scope Requires More

- Optometrists in Kentucky perform a number of medical procedures not within the scope of optometric practice allowed in any Canadian province, including laser surgery, injections, and surgical removal of eyelid bumps. The NBEO Part I exam assesses competencies and knowledge that are essential for the skilled and safe practice of these procedures.

## An End to Respect for Kentucky Optometric Licensure

- Lowering the standards for licensure in Kentucky could end the reciprocity that Kentucky currently enjoys with many other U.S. states. Kentucky residents may also lose confidence in the profession and instead seek care from ophthalmologists or from optometrists in bordering states. The proposed change would harm both Kentucky's patients and the profession.

**This proposed regulatory change risks the vision and overall health of your constituents. We urge you to reject the proposed regulatory amendment to 201 KAR 005:010.**

# Lowering licensure standards puts Kentuckians' eye health at risk

A legislative committee is considering a regulatory change to eliminate the requirement that optometry candidates pass the NBEO Part 1 Applied Basic Science exam that is a condition of licensure in every state in the U.S.



## **This change will lower standards for optometric licensure in Kentucky**

The proposed change suggests “substituting” a Canadian exam that does not test biomedical knowledge such as basic anatomy of the eyes.



## **Kentucky optometric students don't need lower standards**

Optometric candidates in Kentucky who are qualified to practice can and should pass the U.S. exam - they don't need lower standards to qualify.



## **This change would be bad for the profession and for patients**

By permitting this amendment and lowering the standard to obtain a license, you would allow unqualified candidates to receive licensure and practice in Kentucky.



## **Kentucky would be the only state in the country to accept a foreign licensure exam for optometric practice**

The Canadian exam is based entirely on the narrower scope of practice in Canada and is not accepted anywhere in the U.S. It doesn't assess knowledge needed for the laser and surgical procedures that optometrists in Kentucky are authorized to perform.

**This amendment is not in the best interest of patients or the people of Kentucky. We urge you to reject the proposed regulatory amendment to 201 KAR 005:010.**