



Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary

Maryland Board of Examiners in Optometry
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Members of the Kentucky Interim Joint Committee on Health Services:

On behalf of the Maryland Board of Examiners in Optometry, I am writing to oppose the proposed amendment to 201 KAR 5:010 to accept the Optometry Examining Board of Canada (OEBC) written exam as an alternative to the National Board and Examiners in Optometry (NBEO) Part I Exam for licensure in Maryland.

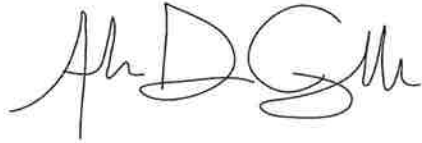
As an optometry licensing board, we are concerned about the potential ramifications of the regulation amendment. The proposed change has the potential to permit optometry graduates, who may have failed NBEO Part I Exam six times, to take the OEBC written Exam and obtain a Maryland license. With that license, these optometrists could then apply for a license through reciprocity or endorsement in another state. The reason for the change listed in the Impact Analysis is because "a number of students could not pass the NBEO Exams." We feel that those students need additional education to improve their knowledge and skills, not a lowering of the standards for licensure.

The NBEO is a widely respected organization that is recognized across all states and territories in the United States for optometric licensure. Use of the NBEO Exams ensures uniformity and consistency in the qualification of optometrists to enter practice and allows for license mobility across the country. The NBEO Part I Exam is a multiple-choice exam that tests the basic biomedical science concepts necessary to enter the clinical practice of optometry. The OEBC Written Exam is case-based and assesses clinical thinking and decision making with an emphasis on assessment, diagnosis and planning, and patient management. The two exams are not equivalent, and one should not be substituted for the other to assess the competency of optometric students.

The proposed amendment does not protect the health and safety of the citizens of Maryland. The Maryland Board of Optometry is opposed to this proposed regulatory change by the KBOE due

to concerns related to public protection, consistency, and the confusion that will arise from this modification.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Dean Gogerdchi'. The signature is fluid and cursive, with the first letter 'A' being large and prominent.

*A. Dean Gogerdchi, O.D., President
Maryland Board of Examiners in Optometry*