



**To:** Senate Public Health and Welfare Committee

**From:** Rachelle Colombo  
Executive Director

**Date:** March 24, 2025

**Re:** HB 2223; Expanding Optometry Scope of Practice

The Kansas Medical Society (KMS) appreciates the opportunity to testify in opposition to HB 2223, expanding Optometry Scope of Practice. Under HB 2223, optometrists would be authorized to perform several surgical procedures and treatments currently reserved for those trained and licensed as medical doctors (MDs) and doctors of osteopathy (DOs). This represents a significant and broad expansion to current law. Scope of practice issues are sometimes seen as “turf battles” about professional competitiveness. But it is critical to consider how the law protects patients by requiring appropriate education, training, licensure, and oversight of those who hold themselves out to provide medical care.

The last time the optometry practice act was amended was in 2010, after extensive meetings between optometrists and ophthalmologists to discuss the changes in training and education that supported expansion in optometric scope without compromising patient care. These changes were discussed at length and agreed to before being brought to the legislature. **When the involved professions work together to outline appropriate statutory changes that clearly outline the role of each profession and protect the public, it yields better policymaking.** The changes outlined in HB 2223 are highly technical and cover a broad array of procedures that non-providers may not be familiar with and ready to determine appropriate limitations that consider the differences in the field of optometry and that of a physician. This challenge is not unique to the legislature – individuals seeking care often struggle to distinguish the difference between types of health care providers and the care they can offer and the recourse available in the event of an adverse outcome.

The Kansas Medical Society believes that those who practice medicine and surgery must be trained, licensed, and regulated at the highest level. This standard should be applied to all who practice any aspect of medicine or perform surgery, not just medical doctors and doctors of osteopathy. Providers seeking to expand their scope to allow for independent diagnosis, treatment, prescribing and the performance of surgery must be subject to uniform requirements for licensure and to carry medical professional liability coverage and participate in the Health Care Stabilization Fund as a condition of licensure. These standards should not differentiate among provider types if the practice overlaps into independent medical practice.

**One of the most alarming aspects of HB 2223 is that it allows the Board of Optometry to determine the limitations on optometric scope of practice without legislative approval – effectively allowing this unelected regulatory board to legislate policy affecting public health and patients. Also of note, the board of optometry does not include physicians or surgeons – which begs the question how they can appropriately regulate what they are not trained or licensed to practice.**

While we understand there have been recent discussions between representatives of the optometrists and ophthalmologists, these larger questions have not been addressed, and the specifics of HB 2223 have not been agreed to or addressed inconsistent standards. KMS opposes HB 2223 as written and believes Kansas patients would be better served by continuing conversation aimed at addressing these concerns and reaching agreement.

Thank you for the opportunity to offer these comments in opposition to HB 2223.