

**Subject:** Optometry Education and Training in Ocular Injections

**Dear Legislator,**

The education standards for Doctors of Optometry are publicly available and itemized by the Association of Schools and Colleges of Optometry (ASCO). Additionally, we have legal affidavits from optometry schools across the country confirming that their curricula include the procedures outlined in this bill.

The procedures and services that optometrists seek to perform are comprehensively taught throughout their education. These skills are:

- Introduced in the classroom and integrated into basic and clinical science courses,
- Developed through hands-on training in labs and workshops, and
- Observed and performed under the supervision of qualified faculty and clinicians.

Doctors of Optometry complete a rigorous four-year doctoral program that includes:

- 10,000 hours of education focused on the eye and visual system,
- 2,000 patient encounters before taking national and state board exams (both written and practical).

Before handling any instruments, optometry students receive extensive training in:

- Anatomy and physiology,
- Ocular disease,
- Pre- and postoperative care,
- Risks and benefits of surgical procedures.

A strong indicator of competency is the record of successful outcomes in states where optometrists have performed these procedures for decades. Notably, no state has ever rolled back the scope of optometric practice after expanding it to include these services.

**Specific to Ocular Injections:**

- All 26 optometry schools in the U.S. teach and proctor ocular injections as part of their curriculum.
- Training includes both didactic classroom instruction and hands-on laboratory experience.
- Ocular injections are a required skill for all optometry students during their four-year doctorate training.
- The number of injections performed varies depending on externship sites, but competency in these skills is necessary to pass national board exams and obtain state licensure.

Since August 2012, the National Board of Examiners in Optometry (NBEO) has tested optometry students on injection skills. The NBEO injection skills exam includes:

- Intramuscular (IM),
- Intravenous (IV),
- Subconjunctival,
- Intradermal, and
- Intralesional injections.

Further, there are schools and training sites that provide instruction on injection techniques beyond what is included in the national board exam. This includes injections into the eye, continuing to build on the foundational knowledge that Doctors of Optometry gain during our training. Optometry students are trained in these injections just as other professionals with injectable authority are, and these procedures are performed on their fellow peers, model eyes, and other simulation techniques to ensure proficiency before entering clinical practice.

Doctors of Optometry across the country have a long history of successfully performing these procedures with safe outcomes. Minnesotans deserve timely, high-quality care from their optometrists. SF 1144/HF 1011 is a critical step toward addressing the growing shortage of eye care providers in our state.

Thank you for your time and consideration.

**Minnesota Optometric Association**