



April 25, 2025

The Honorable John Marty
Chair, Finance Committee
Minnesota Senate
3235 Minnesota Senate Bldg.
St. Paul, MN 55155

Dear Chair Marty,

On behalf of the Minnesota Dermatological Society, we write to urge the Finance Committee to amend SF 2669, the 1st Engrossment (HHS Omnibus budget bill), to remove provisions which would lower the standards of eye care by authorizing optometrists to perform injections without the necessary medical education and surgical training it takes to safely perform these delicate procedures. We oppose this inappropriate scope of practice expansion for optometrists as we believe it disregards adequate and appropriate medical training and jeopardizes patient safety.

Dermatologists diagnose and treat more than 3,000 diseases, including skin cancer, psoriasis, immunologic diseases and many genetic disorders. As physicians who are on the front lines fighting skin cancer and treating numerous skin diseases, we often refer our patients to an ophthalmologist if there are signs of an eye disease. For example, some adults who have atopic dermatitis, the most common type of eczema, have a higher risk of developing certain eye diseases. Atopic dermatitis can develop on the eyelids and around the eyes, causing itchy skin and red, swollen eyes that require judicious treatment to avoid long-term damage to the eyes.

Surgical procedures, including injections of potent medications, constitute the practice of medicine and surgery; it is not the practice of optometry. We believe the practice of cutaneous medicine includes, but is not limited to, performing any act or procedure that, by its intended or improper use, can alter or cause biologic change or damage living

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tissue. Such acts or procedures include, for example, skin excisions, the use of all lasers, light sources, the injection or insertion of foreign or natural substances, or soft tissue augmentation. We maintain a steadfast position that these procedures should be performed only by a licensed physician or under the direct, onsite supervision of a physician.

Optometric training does not prepare optometrists to perform medical and surgical procedures. The optometry scope expansion in SF 2669 substitutes an optometry school program, which focuses on basic eye care services like eye exams/refractions and contact lens fitting, for current physician-training standards requiring thousands of hours of medical education, clinical and surgical experience and other training. Authorizing the practice of surgery for those who completely bypassed medical school and residency is in no way a solution to ensure access to the safest patient care that Minnesotans deserve.

As dermatologists, our utmost concerns are patient care and patient safety. Quality patient care includes evaluating a patient's needs and current condition, selecting an appropriate course of treatment, and providing adequate information and follow-up care. Short-term training is in no way equivalent to a physician's training and understanding of a medical procedure and its implications for each patient. Further, any surgical procedure faces the potential for complications from known or unknown causes or underlying, serious medical conditions. When complications occur, the patient deserves and expects to be treated by someone with the medical, clinical and surgical knowledge and experience to manage those complications to ensure the best possible patient outcome.

In order to protect the patients of Minnesota from potential adverse events and ensure quality care, we urge you and the Finance Committee to remove the language expanding optometry scope of practice to perform injections from SF 2669. We appreciate the opportunity to provide written comments on this issue. For further information, please contact Rosemary Lobeck, Executive Director for the Minnesota Dermatological Society at rlobeck@mndermsociety.org.

Sincerely,

Sarah S Asch, MD, FAAD

President

Minnesota Dermatological Society