



MINNESOTA ACADEMY of  
EYE PHYSICIANS and  
SURGEONS

April 8, 2025

Senator Melissa Wiklund, Chair  
Senate Health and Human Services Committee  
95 University Avenue W., Room 2107  
St. Paul, MN 55155

RE: SF2669, A-6 delete-all amendment

Dear Senator Wiklund,

On behalf of Minnesota's ophthalmologists and the Minnesota Academy of Eye Physicians and Surgeons, we thank you for your time, effort and work towards a rationale and reasonable policy on safe vision care for all Minnesotans.

We write to endorse the Senate's proposed language in SF2669, the A-6 amendment (HHS omnibus), and ask you to oppose any amendments allowing optometric injections. While we have significant concerns about the need and justification for unrestricted oral prescribing authority for patients of any age and any diagnosis, the A-6 amendment reflects a reasonable compromise for the 2025 Session on vision scope.

**When it comes to the eye and areas around the eye, injections are surgery.**

Vision is vital to daily life, and the eye, especially the retina, optic nerve, iris, and their surrounding tissues, are all part of the human brain (central nervous system). Eye Surgery is one of the most delicate of surgical fields among all surgical specialties. Because we are performing microsurgery with great precision, needles are our scalpels. Optometrists are not surgeons. Optometric weekend courses on injections are not equivalent to thousands of hours of hands-on procedural clinical experience gained during medical school and ophthalmology residency training.

The broad injection authority granted in SF1144 and related bills would allow injection into the eyelids, the muscles that move the eyes, and numerous spaces within the eyeball itself, including areas underneath the retina. Only five states in the United States -- Wyoming, Oklahoma, Kentucky, Tennessee and North Carolina -- allow injections in and around the eye along the lines proposed in SF1144. Eye surgery should only be performed by medical doctors who are board-certified/board-eligible eye surgeons.

Thank you for your work to ensure we remain the best state in the country for patient safety and the highest level of vision healthcare.

Sincerely,

Dr. Amanda C. Maltry MD, President  
Minnesota Academy of Eye Physicians and Surgeons,