



MINNESOTA ACADEMY of
EYE PHYSICIANS and
SURGEONS

April 2, 2025

Co-Chair Jeff Backer and Co-Chair Robert Bierman
House Health and Human Services Committee
Centennial Office Building
St. Paul, MN 55155

RE: HF2464 A-2 amendment

Dear Co-Chair Bierman and Co-Chair Backer,

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 request the adoption of the HF2464 A-2 amendment, removing the proposed changes in optometric scope of practice related to 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-2 amendment reflects a reasonable compromise by all parties for the 2025 Session.

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 physicians, and they are not surgeons.

The broad injection authority granted in HF1011 and HF2464 allows injection into the eyelids, the muscles that move the eyes, and numerous spaces within the eyeball itself, including areas underneath the retina. Optometrists do not perform these procedures as part of their training. Only five states in the United States allow injections in or around the eye along the lines proposed in HF1011 and HF2464, if the A-2 amendment were not adopted. 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,