

Help Better Meet the Vision and Eye Health Care Needs of America's Veterans

America's Veterans Need and Deserve at Least the Same Access to Optometry-Provided Care as Every Other American

Summary

Vision and eye health care is the third-most requested service by veterans, outpaced only by primary care and mental health care. U.S. Department of Veterans Affairs (VA) doctors of optometry provide roughly **three-quarters** of essential primary and medical eye care services Veterans receive each year, including **73% of the 2.5 million selected ophthalmic procedures and nearly 99% of services in low vision clinics and blind rehabilitation centers**. VA optometrists are currently practicing at 95 percent of the VA sites where eye care is offered and are often the only licensed independent eye care practitioner available.

Veterans deserve access to the vision and eye health care they need, when and where they need it.

Facing the growing need for eye and vision care, VA supported and Congress enacted legislation (Elizabeth Dole 21st Century Veterans Healthcare and Benefits Improvement Act) seeking to boost recruitment and retention of VA doctors of optometry by providing physician-level recognition and market-based pay. While a positive step, it's still concerning that VA currently does not fully embrace Veteran access within VA facilities to the full range of care doctors of optometry are educated and licensed to provide—making VA in-house provided care the outlier among all private payers and other federal programs—even the VA's own Community Care program.

That's why doctors of optometry, leading Veteran Service Organizations, and others are urging Congress to make clear to VA that Veterans need and deserve guaranteed access to the full range of care optometrists are trained and licensed to provide as the VA updates its Eye Care Directive and issues new Optometry National Standards of Practice.

Eye and vision care ranks as the third-most requested service by Veteran patients, behind only primary care and mental health care. Doctors of optometry provide roughly three-quarters of all eye and vision care within the VA, and in many facilities they are the only licensed independent eye care practitioner available to patients. Research shows doctors of optometry practice in more than 10,000 communities and counties that account for 99 percent of the U.S. population.

Thirty-nine percent of U.S. counties or county-equivalents have access to a doctor of optometry but not an ophthalmologist. According to the Health Resources and Services Administration, by 2025 there will be a shortage of about 6,000 ophthalmologists. While VA is still in the process of deciding the status of optometry-provided laser eye care within VA facilities, the Department continues to rely on doctors of optometry



participating in its Community Care Program to provide Veterans with injections, lasers, and other surgical eye care that they need, when and where they need it.

Like other federal programs and private health insurance providers, the VA Community Care Program defers to state laws and regulations that recognize a doctor of optometry's ability and authority to provide laser and other medical eye care to those located in that state. In fact, current VA Community Care guidelines cite that injections, lasers, and eye surgery can be provided by "an ophthalmologist or optometrist based on the state licensure of the provider."

This existing policy ensures better Veteran access to needed services, reduces wait times and travel distances for that care, eliminates the need for multiple Community Care encounters, potentially saving the Federal Government and Veterans money, and ensures that Veterans are able to access the provider of their choice. The policy also ensures that Veterans are treated fairly and have the same access to care now enjoyed by nearly all other people in their states, including those covered by Medicare, Medicaid, the Indian Health Service, and all major private health insurers. Veteran advocates are staunch supporters of that VA policy.

VA Must Align In-House Eye and Vision With All Other Private and Federal Programs

Through its process of developing National Standards of Practice (NSP) and issuing an updated Eye Care Directive, the VA is now deciding which services VA doctors of optometry will be recognized to provide within VA facilities, which will have a significant impact on Veteran access to needed care for years to come. That's why leading members of Congress are joining with top Veteran Service Organizations (VSOs) to urge the VA to ensure that Veterans have access to the full scope of services that doctors of optometry can provide under their respective state license.

While some detractors may claim safety concerns, the reality is that over the past 30 years an increasing number of states (currently 25) have passed laws authorizing their state's doctors of optometry to provide a wide range of needed medical and surgical eye care, including procedures such as injections, removal of foreign bodies, and therapeutic laser eye care.

These states cite that this authority has led to an increase in access to care that patients need, particularly in their state's underserved and rural areas. Oklahoma optometrists, for example, have been providing laser eye care since the 1980s, with little or no reported complaints. A 2024 study (Establishment and Review of Educational Programs to Train Optometrists in Laser Procedures and Injections) cataloged nearly 150,000 laser procedures performed by optometrists across the U.S. since the 1980s with near-zero negative outcomes. Additionally, malpractice rates for states with this authority

are largely identical to rates in states without it, highlighting the safety and efficacy of optometry-provided laser eye care.

With an unmet and growing need for Veteran access to vision and eye health care, it is critical that VA utilize the full range of care VA doctors of optometry are trained and licensed to provide, including injections, lasers and eye surgery recognized under their state license.

The Ask

America's doctors of optometry, leading Veteran Service Organizations, and others are urging Congress to make clear to VA that Veterans need and deserve guaranteed access to the full range of care optometrists are trained and licensed to provide as the VA updates its Eye Care Directive and issues new Optometry National Standards of Practice.

“On behalf of America’s more than 20 million veterans and their families, AMVETS applauds the VA and encourages the Department to continue working to ensure that all Veterans have access—when and where they need it - to the full range of care that all eye doctors within VA and in the community are trained and licensed to provide.” says Joe Chenelly, AMVETS National Executive Director. **“AMVETS agrees with VA that these policies, which aim to better ensure Veteran access to a wide range of medical eye care services provided by doctors of optometry and ophthalmologists based on the license of the provider, will aid our nation’s Veterans by ensuring needed access to services which providers are legally licensed to provide, by reducing the need for multiple Community Care encounters - which could save Veterans and the Federal Government money - and allow Veterans to chose their preferred provider within the care network. We also think this ensures that our Veterans are treated fairly and have at least the same access to the care they need which is now afforded to nearly every other citizen in their state.”**



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March 24, 2023

The Honorable Denis McDonough
Secretary, U.S. Department of Veterans Affairs
810 Vermont Avenue, NW, Room 1063B
Washington, DC 20402

Dear Secretary McDonough,

On behalf of the millions of Veterans, families, and survivors AMVETS represents, I am writing to express our appreciation for ongoing Department of Veterans Affairs efforts to protect and boost access to needed health care services, including eye and vision care services. With vision and eye health care ranking as the third-most requested service by Veteran patients, we urge VA to continue working to ensure that all Veterans have access - when and where they need it - to the full range of care that eye doctors within VA and in the community are trained and licensed to provide.

AMVETS is appreciative for and supports recent amendments made by VA to its Eye Care Comprehensive Standard Episodes of Care (SEOC) – a change which aims to better ensure Veterans access to a wide range of medical eye care services provided by both optometrists and ophthalmologists, based on the state licensure of the provider. We agree with VA that “this change will improve access by allowing providers to render services for which they are legally licensed, reduce the need for multiple Community Care encounters and allow Veterans to choose their preferred provider within the care network.” This move also helps ensure that Veterans are treated fairly and have the same access to care now enjoyed by pretty much every other citizen in their states, including those covered by Medicare, Medicaid, the Indian Health Service, and all major private health insurers. If VA is considering any further changes to these policies, we would ask for a full briefing beforehand.

Additionally, as VA works to finalize optometry national standards of practice, we would urge the Department to follow the aforementioned Eye Care SEOC approach by ensuring that Veterans within VA – as they now do through the community – have access to the full range of care that both ophthalmologists and optometrists are trained and licensed to provide. While optimistic that the new standards will help boost access to needed care, we are concerned that they may not include some eye care services provided by optometrists simply because these types of eye doctors are authorized to provide those services in less than a majority of states. Should VA take the approach of only including health care services in the standards which are authorized in a significant number of states, AMVETS is worried that Veterans in some states may needlessly be denied access to essential health care services solely because states other than their own have failed to act. AMVETS urges VA to ensure that through these practice standards Veterans,

at the very least, have the same access to the same services that every other citizen of their state now enjoys.

Thank you, again, for your commitment to protecting and improving access to care for our nation's Veterans. With vision and eye health care ranking as the third-most requested service by Veteran patients, these issues are of utmost importance to our members and we look forward to continuing to work with you and the Department to ensure that all Veterans have access to the full range of care that eye doctors within VA and in the community are trained and licensed to provide.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph R. Chenelly". The signature is written in a cursive style with a large initial "J" and "C".

Joseph R. Chenelly
AMVETS, National Executive Director



Secretary Denis McDonough
U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

Dear Secretary McDonough,

As President of the Blinded American Veterans Foundation, I am reaching out to address critical issues concerning the optometry services within the Veterans Affairs (VA) health system. Our foundation is deeply committed to ensuring that veterans receive the highest standard of eye and vision care, a commitment that I know the VA shares.

National Optometry Standards of Practice

The establishment of national optometry standards of practice is paramount. Vision and eye health care is the third-most requested service among veterans, making the VA's decisions in setting these standards a matter of great consequence. Optometrists in the VA currently deliver three-quarters of all eye and vision care, and in many regions, they are the sole independent eye care providers available to veterans. It is essential that the VA's optometry practice standards include the full scope of care and services, including laser and other surgical procedures, that optometrists are trained and licensed to provide by their state. Such inclusivity not only aligns with the VA's rigorous credentialing processes but also ensures that veterans have access to comprehensive eye care services, mirroring the access afforded to other Americans under Medicare, Medicaid, Indian Health Service, the Department of Defense, and private insurance.

Compensation and Recruitment of Optometrists

An equally pressing issue is the compensation and retention of optometrists within the VA system. Currently, optometrists are notably underpaid compared to their peers in the private sector, as they are not included on the VA physician pay scale. This significant pay disparity is not just a matter of equitable compensation but also impacts the VA's ability to attract and retain highly qualified optometrists. The combination of limited practice scopes and inadequate compensation is deterring top-tier optometrists from choosing a career with the VA. This situation risks diminishing the quality of care available to our veterans and will likely lead optometry graduates and practicing doctors to seek opportunities outside the VA. Addressing this issue is critical to maintaining a workforce capable of providing the best possible care to our veterans.

Conclusion

We are optimistic that the VA will set comprehensive and inclusive standards for optometry practice. However, without addressing the compensation issue, the VA risks a shortfall in skilled optometrists, which could ultimately affect the quality of care available to our veterans. We urge the VA to consider aligning optometrist compensation with that of other VA physicians and ensuring that optometrists can practice to the full extent of their training and licensure.

Thank you for your attention to these important matters. We look forward to continuing our collaborative efforts with the VA to ensure that all veterans have access to the high-quality eye care they deserve, when and where they need it.

Semper Fidelis,

Michael L. Jernigan
President
Blinded American Veterans Foundation

Congress of the United States
Washington, DC 20510

March 20, 2025

Secretary Doug Collins
U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

Dear Secretary Collins,

Thank you for your service to our nation's Veterans. With eye and vision care ranking as the third-most requested health care service by Veterans nationwide, Congress has an outsized interest in ensuring that Veterans have ready access to the eye and vision care they need, when and where they need it. As the Department of Veterans Affairs (VA) continues to consider policies that would directly impact the VA's ability to meet the growing vision and eye health care needs of our nation's Veterans, including the renewal of the VHA Eye Care Directive (VHA Directive 1121), we urge the Department to ensure those policies guarantee Veteran access to the full range of eye care services doctors of optometry are trained and licensed to provide under their state license.

Right now, roughly 1,100 VA doctors of optometry care for more than 70 percent of the total unique Veteran visits involving eye care services, including 73 percent of the 2.5 million selected ophthalmic procedures and nearly 99 percent of services in low vision clinics and blind rehabilitation centers. VA optometrists currently practice at 95 percent of the VA sites where eye care is offered and, in many facilities, they are the only licensed independent eye care practitioner available. With VA's public recognition of difficulties meeting Veteran demand for needed eye and vision care services, policies set forth in the Eye Care Directive will have a significant impact on Veteran access to these essential services for many years to come. Therefore, it is critical that the Directive does not limit Veteran access to the full range of care optometrists are licensed by their state to provide.

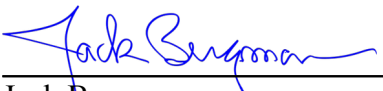
Currently, laws and regulations in more than 25 states provide for citizen access to local doctors of optometry for a wide range of medical eye care services, including injections and numerous surgical eye procedures. A dozen states now recognize optometrists' authority to provide therapeutic laser surgical eye care, with a half-dozen states now considering similar law changes in 2025. Medicare, Medicaid, the Indian Health Service, the Department of Defense, and all major private health insurers recognize an optometrist's ability and authority to provide the range of eye and vision care included under their state license, including lasers and other eye surgeries. Nearly every American covered by every other federal health program and every major commercial insurer right now has the ability to access an optometrist for the full range of

medical eye care they are authorized by their state to provide, and our Veterans should be no different.

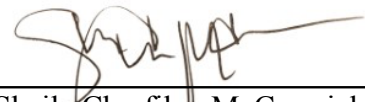
The VA itself has also recognized the value in, safety of, and need for doctors of optometry to provide the full range of care their state license authorizes. In September 2022, VA issued guidance for its Community Care program recognizing that injections, lasers, and eye surgery can be provided by an optometrist or an ophthalmologist based on the state licensure of the provider. For many communities, particularly traditionally underserved communities with little access to other types of eye doctors, this policy has been the difference between receiving timely care and going without needed services. Veteran Service Organizations, including AMVETS and the Blinded Americans Veterans Foundation, have urged VA to protect this access to the full range of care optometrists can now provide through the Community Care program and have urged the Department to ensure that Veterans have access to this needed care within VA facilities from optometrists as well.

With eye and vision care ranking the third-most requested service and VA struggling to meet demand for this essential care, we urge the Department to ensure policies guarantee Veteran access to the full range of eye care services doctors of optometry are trained and licensed to provide under their state license. Thank you for your attention to these important matters. We look forward to continuing our collaborative efforts with the Department to ensure that our Veterans have access to the high-quality eye care they need and deserve, when and where they need it.

Sincerely,



Jack Bergman
Member of Congress



Sheila Cherfilus-McCormick
Member of Congress



Jen A. Riggans
Member of Congress