

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

Sign the Bergman/Cherfilus-McCormick bipartisan letter urging the VA safeguard Veteran access to the full range of care optometrists are licensed to provide, and advance legislation to better recruit and retain the doctors of optometry the VA needs to keep up with Veteran demand.

Summary

Vision and eye health care is the third-most requested service by Veterans, outpaced only by primary care and mental health care. VA doctors of optometry provide roughly 70% of essential primary and medical eye care services, 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% of the VA sites where eye care is offered and are often the only licensed independent eye care practitioner available.

Veterans Need Access to All Care VA Doctors of Optometry are Trained and Licensed to Provide

Right now, the VA relies on doctors of optometry to provide needed laser procedures and other medical eye care through its Community Care Program, when and where Veterans need it. However, the VA is still deciding what care Veterans may access from optometrists working within VA facilities. That's why Reps. Jack Bergman (R) and Sheila Cherfilus-McCormick, leading members of the House VA Committee, are asking all House members to sign the bipartisan letter urging the VA to bring its internal policies in line with every other federal program and major private payer by allowing Veterans to access optometrists for the full range of care their state license allows.

Help VA Recruit and Retain the VA Doctors of Optometry Needed to Keep Up with Veteran Demand

Despite the key role doctors of optometry play in the delivery of VA health care nationwide, the VA continues to face difficulties recruiting and retaining the doctors of optometry it needs to keep up with Veteran demand. VA policy leaders agree that the statutory pay scale and pay cap are major factors in the unfolding optometry recruitment and retention crisis. To help solve these problems, Congress is being urged to advance existing language to add optometry to the physician/dentist/podiatrist pay scale and give the department the tools it needs to recruit and retain optometrists to better compete with private-sector pay in local communities.

Ensuring Veterans Have Access to the Eye Care They Need, When and Where They Need It

Research shows doctors of optometry practice in more than 10,000 communities, and in counties that account for 99% of the U.S. population. **A total of 39% 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.



Within the VA, roughly 1,100 optometrists are currently practicing at 95% of the VA sites where eye care is offered and are often the only licensed independent eye care practitioner available. While the VA is still deciding the status of optometry-provided laser procedures and other medical 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 eye care Veterans need, when and where they need it.

— Like all other federal programs and private health insurers, the VA Community Care Program defers to state laws and regulations that recognize an optometrist's ability and authority to provide laser procedures 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 this VA policy.

— Through its process of developing National Standards of Practice (NSP), the VA is now deciding which services to include or exclude from the Optometry NSP, 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 have passed laws authorizing their state's doctors of optometry to provide a wide range of needed medical eye care, including medical 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 that care since the 1980s, with little or no reported complaints. In fact, malpractice rates for states with this authority are roughly identical to rates in states without it, highlighting the safety and efficacy of optometry-provided laser eye care.

The Ask

Knowing how vital it is to get this policy right, Reps. Bergman and Cherfilus-McCormick are asking all House members to join them on the bipartisan letter urging the VA to guarantee veteran access to all care optometrists are authorized to provide under their state license, whether they receive that care within VA facilities or in the community. Senators are asked to send their own letter mirroring the bipartisan House sign-on letter.



Fixing the Optometry Recruitment and Retention Crisis

Despite the key role VA doctors of optometry play in the delivery of eye care to our nation's Veterans, the department continues to face difficulties recruiting and retaining optometrists to meet the demand. Currently, VA optometrists are included within the general schedule (GS) pay scale, which has gone largely unchanged since 1976.

In 2004, legislation created a new pay scale for allopathic and osteopathic physicians to allow physician compensation to remain competitive with private-sector employment opportunities. Over time, dentists and podiatrists moved over to this new market-based pay scale as well, leaving optometrists under the antiquated GS pay scale. Without a market-based pay scale, **VA optometrists are currently compensated from \$20,000 to \$60,000 less than their private-sector peers in the same communities**, particularly in rural and other underserved areas. The current pay discrepancy has led to numerous chronically vacant optometry positions at VA facilities across the country, resulting in suboptimal access to the specialized eye care our Veterans require and deserve. Compounding the crisis, **a little over 20% of the VA optometry workforce is at or near retirement eligibility**. Senior optometrists are separating from the VA or retiring because they have reached the legislative pay cap. In many regions, the current GS pay scale cap is far below that of the private sector, making private-sector employment the more attractive and often necessary option. This exacerbates the provider retention problem and impacts rural VA communities in desperate need of quality eye services the hardest.

The VA supports adding optometry to the physician/dentist/podiatrist pay scale. An August 2022 memo (VIEWS 8154579) issued by VA leadership said, “the current salary structure for VA Title 38 Optometrists is inadequate...as a result of this statutory pay limit, many VHA Optometry departments are unable to hire VA Optometrists...” Further, in a Sept. 6, 2022, letter, VA Under Secretary for Health Shereef Elnahal, M.D., said “the National Optometry Program Office is planning to submit a legislative pay proposal requesting optometry be changed to the physician/dentist/podiatrist pay structure... I support the National Optometry Program Office in these efforts to invest in our optometry workforce.” **Leading VSOs, including American Veterans (AMVETS) and Disabled American Veterans (DAV), also support adding doctors of optometry to the physician/dentist/podiatrist pay scale**, allowing for market-based pay analysis in determining salaries that are more competitive and flexible in both rural and urban settings.

“VA must immediately address the issue of optometrists at the VA being among the most undervalued practitioners within the system. Despite their integral role in providing essential eye care services to Veterans, VA optometrists are the only independently licensed practitioners not included on the VA Physician pay scale. This oversight has led to a significant and troubling trend: a mass exodus of highly qualified optometrists from the VA and considerable challenges in recruiting top-tier talent. The disparity in recognition and compensation not only undermines the quality of care available to our nation’s Veterans but also fails to acknowledge the critical, specialized services that optometrists provide. Addressing this disparity is essential for maintaining the standard of care that Veterans need and deserve, ensuring they have access to the best possible eye and vision healthcare services. Adding insult to injury, recent inner VA politics have led to certain VA leaders suggesting that VA optometrists cannot practice at the top of their licensing and training. This double whammy will result in even more optometry recruitment and retention issues. Ultimately, this will leave the VA critically short on optometrists and force the VA to pay increased costs to send Veterans to optometrist in community care instead of at their preferred provider: the VA. AMVETS strongly supports the position that the Department of Veterans Affairs (VA) must ensure Veterans have access to the full range of eye and vision care services that doctors of optometry are trained and licensed to provide under state laws. The urgency for this action is underscored by the significant demand for eye and vision care among Veterans, making it the third-most requested healthcare service. VA optometrists play a pivotal role, delivering care in over 70% of all Veteran eye care visits and practicing at 95% of VA sites offering eye care. However, the forthcoming Optometry National Standard of Practice and VA policies must not restrict Veterans’ access to comprehensive care, including medical eye care services, injections, and surgical procedures that optometrists can perform in many states. Ensuring that Veterans have access to such comprehensive care aligns with practices in other federal health programs and acknowledges the established capability and safety of optometrists providing these services.”



Bill Clark, National Commander, AMVETS, March 6, 2024 Testimony Before Joint Hearing of House and Senate Committees on Veterans’ Affairs

Congress of the United States
Washington, DC 20515

April XX, 2024

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

Dear Secretary McDonough,

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, 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, what eye care services the Department ultimately decides to include or exclude from the forthcoming Optometry National Standard of Practice will have a significant impact on Veteran access to these essential services for many years to come. Therefore, it is critical that the coming standard 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. 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. Veteran Service Organizations 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



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



**SERVING
WITH
PRIDE**



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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 prominent initial "J" and "C".

Joseph R. Chenelly
AMVETS, National Executive Director

VA Relies on Doctors of Optometry to Help Meet Growing Veteran Need for Laser and Other Medical Eye Care

With Eye Care Ranking as the Third-Most Requested Service by Veterans and Doctors of Optometry Delivering Three-Quarters of that Care, VA's Ongoing Efforts Serve as an Important Link to Optometry-Provided Laser and Other Medicare Eye Care, When and Where Veterans Need It.

With growing Veteran need for laser and other medical eye care services and Health Resources and Services Administration data showing a dwindling supply of ophthalmologists to provide that care, the U.S. Department of Veterans Affairs (VA), Medicare, Medicaid, the Indian Health Service, and federal health programs, along with all major private health insurers, are increasingly relying on doctors of optometry to provide the laser and other medical eye care Americans need, when and where they need it.

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. 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 the VA policy.



Medicare

For many years, Medicare, Medicaid, and other federal health programs have



Medicaid

reimbursed doctors of optometry for and ensured

patient access to therapeutic laser eye care and other medical eye care procedures provided by optometrists licensed to do so by their state. In one state, Oklahoma, doctors of optometry have been providing this care for nearly 40 years.



All major private health insurers cover and reimburse doctors of optometry for laser and other medical eye care authorized under their state license. While plan policies exist to control overall utilization of services, health plans defer to state scope of practice laws and largely treat optometrists and ophthalmologists similarly in terms of procedure coverage.



The Indian Health Service, which similarly operates under a federal supremacy health care system, recognizes the ability of appropriately licensed doctors of optometry

to provide therapeutic laser eye and other procedures to patients and allows its optometrists to provide this care across state lines.



Veteran advocates have strongly encouraged VA to maintain its policy, including American Veterans (AMVETS) - one of the nation's

oldest and most recognized veteran service organizations in the country.



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 choose 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."



AMERICAN OPTOMETRIC ASSOCIATION