

Snell, Toby (PLA)

From: Brad Sutton [REDACTED]
Sent: Wednesday, November 12, 2025 2:08 PM
To: Snell, Toby (PLA)
Subject: Optometry Board rule changes public comment

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Good afternoon. I am an optometrist who has been practicing in Indiana since 1999. I have the following comments regarding the proposed Optometry Board rule changes.

1) Section 8. Asynchronous continuing education. By striking # 4 "internet on-line CE", a very common type is self study CE that is currently utilized would no longer be eligible for credit. Many organizations put CE PowerPoint presentations with tests on their website for CE. By removing "internet-on line", this would no longer be possible, and many currently posted courses would be nullified. Reading an article and taking a test for CE(which would still be allowed) is no different than going through a PowerPoint and taking a test for CE. They are simply different methods for delivering content, and they should both be acceptable methods of obtaining asynchronous CE. I strongly encourage the IOB not to eliminate "internet / on-line" as an acceptable self-study CE category.

2) Only OD's who wish to perform laser procedures / injections / minor lid surgery in Indiana should have to take and pass a separate course / test in those areas. Many practitioners will practice in a manner that does not include these things, so they should not have to take expensive courses / tests in these areas simply to obtain an Indiana license. While these proposed rules address that, they revert back to all new licensees needing to take those tests / courses in 2032 and beyond. There should be no time at which all new licensees would have to take these courses / tests. The 2032 provision should be removed.

Thank you.

Brad Sutton, OD, FAAO

Sent from my Eye Phone