



November 30, 2025

To: Members of the Indiana Optometry Board

Dear Members of the Indiana Optometry Board,

In response to LSA #25-626, I am writing this letter to encourage you to consider all options for Laser and Surgical Procedures qualifications and certifications.

There should be multiple avenues for optometrists to obtain certification to perform laser and surgical procedures in Indiana. For numerous states that have had laser and surgical procedures for many years, the requirement has included a 32 hour training and certification course from an accredited college of optometry. Such states include Oklahoma, Kentucky, Louisiana, Alaska, Arkansas, Wyoming, Virginia, Colorado, Wisconsin, among others. There is a tremendous track record of safety in these states. For example:

Table 4. Number of laser treatments and the negative outcome of procedures performed by optometrists in the US.

| State | Year | Number of laser surgeries | Number of complaint or negative outcomes |
|-------------|----------------------|---------------------------|--|
| Oklahoma | 1988–1998 | Over 50,000 | 1 |
| Kentucky | As of January 2024 | Over 60,000 | 0 |
| Louisiana | As of September 2023 | 25,807 | 0 |
| Alaska | 2020-current | 2,000 | 0 |
| Arkansas | In 2021 | 1,135 | 0 |
| Arkansas | In 2022 | 1,821 | 0 |
| Mississippi | In 2021 | 570 | 1 |
| Mississippi | In 2022 | 1,904 | 0 |
| Mississippi | In 2023 | 2,054 | 0 |
| Wyoming | In 2023 | 1,112 | 0 |

The above is from the published article “Establishment and Review of Educational Programs to Train Optometrists in Laser Procedures and Injections.” All of the listed states required an education and training course provided by an accredited college of optometry, and not an NBEO exam. As you can see, there is a strong proven track record of success.

In Indiana, it would be prudent for future students and doctors to have numerous avenues/options to obtain laser and surgery qualifications and certification.

They should include:

1. NSUOCO Laser and Surgical Procedures Training Course, Written Examination and Proficiency Testing **OR**

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2. Another Optometry schools equivalent Laser and Surgical Procedures Training Course, Written Examination and Proficiency Testing **OR**
 - a. Course needs to be vetted and equivalent to the NSUOCO course with a proven track record of success in terms of qualifying and certifying doctors to safely and effectively perform procedures
3. NBEO Laser and Surgical Procedures Examination (LSPE)

There should be multiple avenues and options for doctors to obtain the final stamp of approval that they are safe to perform procedures on the public. The NSUOCO laser and surgical course has a proven track record in Oklahoma, Kentucky, Louisiana, among many other states. As do other schools courses such as the Kentucky College of Optometry.

There is not one state that has solely relied on the NBEO LSPE exam for providing that final stamp of approval that a doctor is safe to perform procedures. So to make that the only avenue is a mistake in my opinion. It can be one option but should not be the only option. There is no proven track record of success with the NBEO LSPE exam to provide evidence and confidence that passage equates to success in safely implementing laser and surgical procedures. It simply does not exist at this point in time. Therefore, I would recommend you consider multiple options that doctors can consider to determine whether they are safe and competent to perform these important procedures for their patients.

To force every future doctor and student to travel to North Carolina to take the LSPE exam is simply not necessary. If said doctor or student wants to do that, it should be a possible option for them to satisfy the requirement, but not the only option. Making it the one and only option likely will dissuade Indiana optometrists from getting laser certified and that final “stamp of approval”, and could lead to less qualified optometrists wanting to perform laser procedures in Indiana.

Therefore, I would highly recommend that the Indiana Optometry Board seek to provide multiple proven avenues of laser and surgical procedures certification for Indiana optometrists.

If you have any questions, please do not hesitate to contact me anytime.

Sincerely,

 O.D.

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