



Public Comment on LSA 25-626 Updates to Optometry Rules  
Submitted to: Indiana Board of Optometry  
Date: April 2, 2026

Dear Members of the Indiana Board of Optometry,

Thank you for the opportunity to provide further comments regarding the updates to the proposed rule LSA 25-626. We appreciate the Indiana Board of Optometry's continued dedication to protecting the health, safety, and welfare of the citizens of Indiana.

The National Board of Examiners in Optometry (NBEEO®) commends the Indiana Board of Optometry for including the requirement for potential laser and surgical practitioners to pass a nationally standardized, psychometrically validated exam developed for this purpose. The following points summarize the public comments submitted by NBEEO on December 5, 2025, and highlight the importance of such an exam:

- Requiring a high-quality, standardized assessment of competence for optometric practice provides a layer of public protection, which is consistent with the Indiana Board's mission. If required, it also supports the legal defensibility of an optometry board's licensure and certification decisions.
- NBEEO's Laser and Surgical Procedures Exam (LSPE®) is the only nationally standardized, psychometrically validated exam currently in use in the United States to measure competence in these optometric procedures. More than 70 optometrists and ophthalmologists from across North America (including Indiana) have contributed to its development and ongoing review. Details about the exam are available on NBEEO's website at: [optometry.org/exams/lspe](https://optometry.org/exams/lspe).
- Courses and school curricula are valuable for training purposes, but neither one provides a standardized or psychometrically validated measure of competence.
- Several states accept LSPE as evidence of competence in laser and surgical procedures. Most recently, South Dakota and West Virginia adopted LSPE as a requirement for advanced procedure certification or licensure, respectively.<sup>1,2</sup>
- NBEEO's new National Center of Clinical Testing in Optometry allows for the LSPE testing schedule to continue to expand to meet the needs of state boards. Candidates may coordinate the scheduling of LSPE and ISE with the Part III PEPS examination, allowing them to complete all three clinical exams within two days.

Although the updates to the proposed rule would require most new-graduate licensure candidates to pass LSPE before performing laser or surgical procedures, **the proposed rule creates loopholes which would create unnecessary risk to the public.** Demonstrating competence is important for all practitioners, and **the standard should not change based on**

**year of graduation, year of licensure, or type of licensure application.** NBEO urges the Indiana Board of Optometry to reconsider the proposed language that would require certain optometrists to demonstrate competence in laser and surgical procedures while bypassing this requirement for others.

Thank you for your dedication to maintaining the highest standards of patient care and professional accountability in optometry. We welcome the opportunity to provide additional information or answer any additional questions upon request.

Sincerely,

James S. Campbell, OD  
President

Jill Bryant, OD, MPH, FAAO, FSLs, FASOS  
Executive Director

Jamie Althoff, OD  
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Brett Foley, PhD  
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1. <https://doh.sd.gov/media/4cbaoybp/application-advanced-procedures-2025.pdf>
2. <https://optometry.wv.gov/laser-certification>