



Public Comment on Proposed Rule Changes in 852 IAC 1

Submitted to: Indiana Board of Optometry

Date: December 5, 2025

Summary of Key Points

- 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. It also supports the legal defensibility of licensure and certification decisions.
- The Laser and Surgical Procedures Examination (LSPE®) developed by NBEEO® 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 have contributed to its development and ongoing review.
- Courses and school curricula are valuable for training purposes, but they do not provide 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.

Dear Members of the Indiana Board of Optometry,

Thank you for the opportunity to provide comments regarding the proposed rule changes in 852 IAC 1. We appreciate the Board's dedication to protecting the health, safety, and welfare of the citizens of Indiana, and we commend your thoughtful approach in evaluating the standards by which competence in optometric laser and surgical procedures will be demonstrated.

We respectfully urge the Board to consider the importance of including a national, psychometrically validated examination as a required component of demonstrating competence. Doing so aligns with best practices in professional licensure, strengthens public protection, increases fairness for candidates, and provides the Board with a legally defensible foundation for its credentialing decisions.

Importance of a Standardized, Validated Assessment

As health care professionals, optometrists are entrusted with the ocular and systemic health of their patients. To uphold public safety and maintain public trust, it is essential to verify that every provider has the knowledge and skills required to deliver safe, effective care. While educational courses and clinical training are necessary components of skill development, they are not sufficient on their own to ensure competence across all licensure applicants. Course-based assessments are not designed or validated for high-stakes licensure decisions and may vary in content, grading criteria, and rigor. For this reason, optometrists, like all licensed healthcare professionals, must pass an examination to demonstrate competence before they are granted the privilege of independent patient care.

The National Board of Examiners in Optometry (NBEO®) was established in 1951 to provide state boards with a uniform, reliable standard for determining competence in optometry. This benchmark brought legitimacy to optometry as a healthcare profession with a single, nationally standardized board exam series.

The development, administration, and scoring of a high-quality licensure exam follows rigorous psychometric standards, such as the Standards for Educational and Psychological Testing established by the American Educational Research Association, American Psychological Association, and National Council on Measurement in Education. NBEO follows these guidelines, creating examinations that are:

- Developed and maintained with integral and ongoing input of a diverse, representative group of subject matter experts.
- Aligned with the knowledge, skills, and abilities necessary for ensuring safe and effective practice at the point of licensure.
- Evaluated to ensure that results are reliable (i.e., consistent, repeatable).
- Sufficiently rigorous to ascertain that passing candidates have demonstrated competence in the assessed areas.
- Administered in a manner that ensures a fair, standardized experience for all candidates, while maintaining the security of exam content.

Without an independent and standardized exam requirement, a board may risk making licensure decisions based on methods which face many potential issues:

- **Lack of uniformity:** Course and instructor variability can result in inconsistent assessment of candidates.
- **Absence of psychometric validation:** Exams without established reliability, validity, and fairness standards may be difficult to defend if challenged.
- **Conflicts of interest:** Institutions offering training may be incentivized to pass its participants, even if the participant has not demonstrated competence.
- **Lack of fairness:** Examiners may be biased when evaluating candidates with whom they have a previous relationship, while candidates from outside an organization may be at a relative disadvantage.

About the NBEO Laser and Surgical Procedures Exam (LSPE®)

To assist state boards in assessing competence according to the best practices described above, NBEO developed the Laser and Surgical Procedures Examination (LSPE). It is the only nationally standardized and independently administered examination designed specifically to assess competence in laser and minor surgical procedures for optometrists. It includes both a performance-based clinical skills component and a computer-based multiple-choice section that together evaluate:

- Laser procedures: SLT, Peripheral Iridotomy, YAG Capsulotomy
- Surgical procedures: Suturing, Chalazion Excision, Injections, and Anesthesia
- Knowledge of patient management, complications, and decision-making

All candidates complete the exam under the same controlled conditions, using consistent evaluation and scoring criteria. This creates a reliable and equitable standard for all applicants, regardless of where they completed their training. Candidates may take the full LSPE or may instead take only the Laser Section or Surgical Section. Both the Laser and the Surgical Sections require a candidate to perform skills as well as complete multiple-choice questions. For each of the Laser and Surgical Sections of the LSPE, candidates are required to pass both the skills portion and the multiple-choice portion to receive an overall passing score on that section of the exam.

The LSPE was developed over the course of eight years using rigorous psychometric standards according to national best practices. More than 70 optometrists and ophthalmologists from across North America have contributed to its development and ongoing maintenance through:

- A formal **Job Task Analysis** conducted via a nationwide survey, ensuring that the exam reflects the knowledge, skills, and abilities required for safe practice.
- Periodic **Standard Settings**, ensuring that the exam remains current with evolving standards of care.
- A diverse **Exam Development Committee**, composed of optometrists and ophthalmologists from private practice, academia, and the VA, that reviews the exam on an ongoing basis and convenes annually for thorough, focused discussion.

Detailed information about LSPE, including content outlines, evaluation forms, site and equipment details, and registration information, can be found on the NBEO website at <https://optometry.org/exams/lspe>.

About the new National Center for Clinical Testing in Optometry (NCCTO) Facility

During the Summer of 2025, NBEO and the National Center for Clinical Testing in Optometry (NCCTO®), moved its operations to a new location in Charlotte, NC. The new facility has enabled NBEO to double the capacity for administering Part III Patient Encounters and Performance Skills (PEPS®) and to create dedicated exam suites for both LSPE and the Injections Skill Examination (ISE®). With this expanded capacity and ability to conduct multiple clinical exams simultaneously, **NBEO can now administer hundreds of LSPE exams each year, with the flexibility to further expand the testing schedule to**

meet the needs of state boards. Candidates can coordinate the scheduling of LSPE and ISE with the Part III PEPS examination, allowing them to complete all three clinical exams within two days.

In addition, the new space provides:

- Upgraded IT infrastructure to enhance the candidate experience
- Ample space for candidates, standardized patients, and NBEO staff
- Proximity to Charlotte Douglas International Airport and several area hotels and restaurants

Adoption of LSPE in Other States

Several states recognize LSPE as evidence of laser and surgical competence:

- **South Dakota** requires passage of LSPE for all license applicants seeking advanced procedures certification who graduated after July 1, 2024.¹
- **West Virginia** requires passage of LSPE for all optometry license applicants who graduated after May 1, 2025.²
- **Six additional states** accept LSPE as proof of optometric laser and surgical competence, based on NBEO's review of state rules and regulations.

Conclusion

As an independent organization with no affiliation to any individual school, course provider, or professional society, NBEO provides a neutral and objective examination standard. Requiring passage of the NBEO Laser and Surgical Procedures Examination ensures that all licensees demonstrate a uniform, independently verified level of competence, promoting fairness for candidates and strengthening public protection. Because LSPE adheres to nationally accepted psychometric principles, NBEO is able to defend the exam and its outcomes.

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,

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1. <https://doh.sd.gov/media/4cbaoybp/application-advanced-procedures-2025.pdf>
2. <https://optometry.wv.gov/laser-certification>