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**Chair Patterson, Vice-Chair Hayden, Members of the Committee:**

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Chair Patterson, Vice-Chair Hayden, Members of the Committee:

On behalf of Oregon Optometric Physicians Association (OOPA) and it's more than 700 members, we write to you in opposition of Senate Bill 408. The bill, directing Oregon Health Authority (OHA) to establish a process to review scope of practice requests, places additional financial burden and an unnecessary layer of bureaucracy on the expansive agency. The agency will be tasked to do the work that the state should entrust to licensing boards and expert watchdogs for each profession.

SB 408, despite its stated intention, does not take the decision out of the hands of the legislature. This additional process manufactures what amounts to a public hearing that creates a nonbonding, yet public record, that may be weaponized.

The letter of the proposal includes Section 1(a)(B) which, after a scope proposal is submitted, invites opposition testimonials, accurate or not, to become public record. This creates an unnecessary and burdensome challenge for any provider that is not associated with the Oregon Medical Board. The added layer of bureaucracy forces potential conflicts with numerous categories of MDs when you are, for instance, naturopathic physicians, podiatrists or optometric physicians.

The nuance to this proposal will extinguish progress toward health care professionals practicing to the top of their license. The implementation of technological advances will also be stymied with delays created by the unneeded directive. The legislature is not ceding responsibility to this commission, but it is ceding access to timely and appropriate care by creating roadblocks and delaying proposals that restricts access to care.

We respectfully request that when SB 408 comes before you that you vote NO and discard this legislation.

Our member doctors of optometry, located in districts throughout the state, welcome any questions the committee may have regarding workforce challenges facing the optometric industry. Thank you for your consideration.

Sincerely,

Douglas C Melzer OD  
Portland OR

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AOA Strategic Communications Committee  
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