

## Opponent Testimony - S.B. 36

Kenneth Cahill, MD

Ohio Ophthalmological Society and Ohio State Medical Association

Senate Health Committee

October 22, 2025

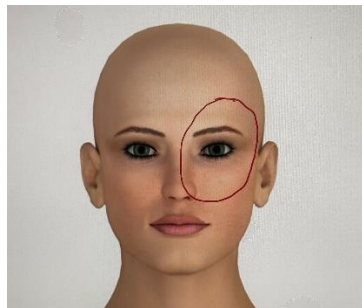
Chairman Huffman, Vice-Chair Johnson, Ranking Member Liston and members of the Senate Health Committee, my name is Ken Cahill. I am an ophthalmologist practicing in Columbus Ohio. I have been in practice for 41 years and specialize in comprehensive ophthalmology and oculoplastic surgery. I am currently in private practice along with being an Adjunct Professor of Ophthalmology at The Ohio State University and Chairman of Ophthalmology, Otolaryngology and Maxillofacial Surgery at Grant Medical Center. I am here today in my capacity as a member of the Ohio Ophthalmological Society and Ohio State Medical Association.

Thank you for the opportunity to speak to you today in opposition to Senate Bill 36. My colleagues have addressed the laser surgery procedures proposed in the bill. I will address the invasive procedures drafted in section 4275.01 (A) (1)-(5).

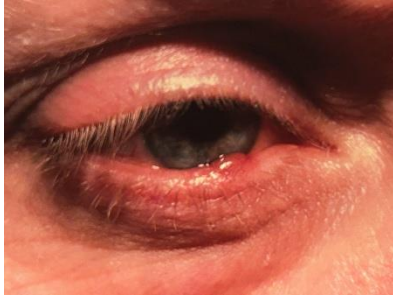
These procedures were described by the proponents last week as “removal of benign eyelid lumps and bumps”, “removal of benign lid lesions such as skin tags, styes and cysts”, and “simple procedures that can be safely performed in a clinical environment.” These descriptions are misleading and fail to describe the level of scope of practice expansion being proposed. Under the bill as drafted, Ohio optometrists could perform these procedures in the examination, investigation, diagnosis, treatment and prevention of any disease, injury or other condition of the visual system. In the proposed language, the visual system is defined as the eye, its associated structures, and its accessory or subordinate anatomic parts. To be clear, this definition includes the globe, eyelids, eye sockets, brows, face, skull, visual radiation, and the brain.

The specific invasive procedures to be permitted would be:

1. Any injection for the visual system including drugs and dangerous drugs, except for intravenous and intraocular administration. These could be injected all around the eyeball as well as any associated or accessory anatomic structure. The injected drugs used in this way include local anesthetics, botulinum toxin, triamcinolone steroid, and chemotherapy including 5-flourouracil and rituximab.



2. Incision and curettage of a chalazion. These inflammatory cysts frequently involve the lid margin, which is excluded for the treatment of solid eyelid “bumps”, but no such exclusion is provided for a chalazion.



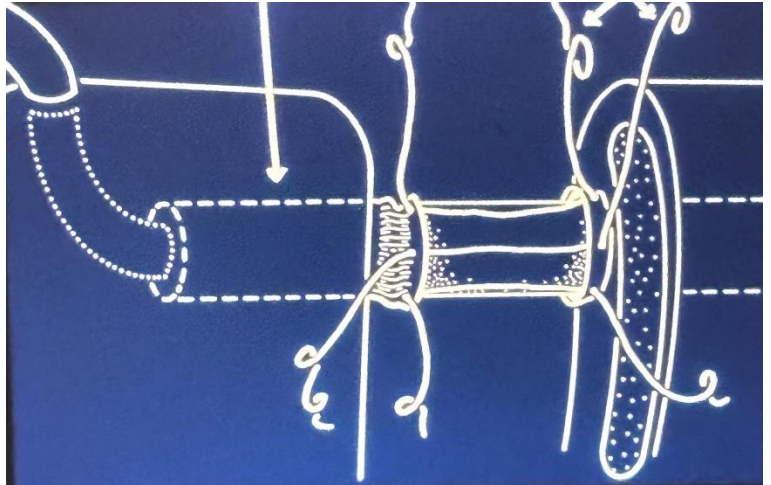
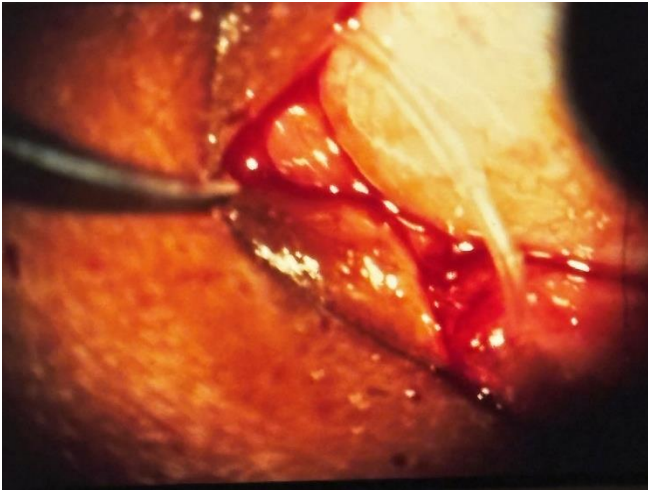
3. Removal and biopsy of skin lesions if suspected to be benign, as long as they are not involving the lid margin. However, they could be anywhere in the “accessory or subordinate parts.” The proposed language does not limit this procedure to the eyelids.



4. Excision and/or drainage of conjunctival cysts or concretions. These can be on the surface of the globe, even along the cornea. They can become large and complex to excise and repair.



5. Any suturing of the “accessory or subordinate anatomic parts”, except the cornea and sclera. This could involve eyelids, the lacrimal (tear) system and surrounding portions of the face.



In summary, the proposed scope of practice expansion in SB36 is extremely broad. Most importantly, there is no standard for training for the five proposed non-laser procedures defined in the legislation. They all entail risk to patient safety. The extent of these invasive procedures is not limited to ocular disorders. They overlap with the care provided not only by ophthalmologists, but also by other medical specialties including, dermatology, otolaryngology, plastic surgery, general surgery, and oncology. These specialties already provide an expansive network to expertly manage disorders of the “visual system” and have established standards for training, certification, and patient safety.

Thank you for your time and consideration. Now with the permission of Chairman Huffman, I will turn our testimony over to Dr. Adrienne Delaney.