



HAMILTON

DR. TOM NYE, OPTOMETRIST
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Written Testimony in Support of Substitute SB 36
Ohio Senate Health Committee
March 4, 2026

Chairman Huffman, Vice Chairman Johnson, Ranking Member Liston, and Members of the Health Committee:

Thank you for the opportunity to provide testimony in support of the substitute version of SB 36, legislation that modernizes the optometric scope of practice in Ohio while strengthening patient safety protections and training requirements.

The substitute bill incorporates important additional safeguards, including expanded training requirements, limits on procedures involving minors, and additional restrictions on injections and eyelid procedures. These changes reflect a thoughtful and responsible approach to ensuring that modernization of optometric care continues to prioritize patient safety.

My name is Dr. Tom Nye, and I am a practicing optometrist in Hamilton, Ohio. I previously served as a member and past president of the Ohio Vision Professionals Board, the state agency responsible for licensing and regulating optometrists. I write in strong support of the substitute bill and the improvements that have been made to further strengthen patient protections and enhance optometric training requirements.

As a former member of the Board, I commend Ohio's current optometric leaders for carefully listening to the questions and concerns raised by members of the Senate Health Committee and for proactively expanding patient safety and training provisions within Senate Bill 36. These additional safety and training requirements, combined with the bill's already reasonable scope of procedures and the removal of outdated prescribing restrictions, represent appropriate and overdue updates to the legislation regulating the profession of optometry.

Throughout my tenure on the Board, patient safety was the paramount consideration guiding all licensure and regulatory decisions. Ohio has long maintained rigorous licensure standards for optometrists, and those standards have never been waived, including during the COVID-19 pandemic. To obtain licensure in Ohio, including licensure by endorsement, applicants are required to submit an official National Board of Examiners in Optometry (NBEO) score report directly to the Ohio Vision Professionals Board. All three parts of the NBEO examination must be successfully passed before an individual is authorized to practice optometry in this state. This

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requirement has been consistently enforced and will continue to be enforced. In addition, applicants must satisfy all applicable state-specific examination requirements prior to licensure.

As this Committee considers modernization of the optometric scope of practice, I strongly agree that patient safety must continue to be paramount. Ohio's regulatory framework has always reflected this commitment, and it must continue to do so. The nationally accepted 32-hour certification course, now coupled with required minimum precepted clinical cases comparable to the proficiency requirements found in ophthalmology residency program accreditation, ensures that the highest training and educational standards are in place so patients receive safe and high-quality eye care. The substitute bill further strengthens these safeguards by prohibiting procedures on patients under the age of 18 and by placing additional restrictions on injections and procedures involving eyelid reconstruction or the lid margin.

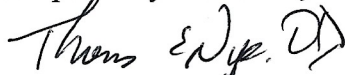
Importantly, this legislation is not intended to replace the important role of ophthalmologists, but rather to ensure that Ohio patients have timely access to appropriately trained eye care professionals working within clearly defined and regulated standards of care.

I would also note that optometric students across the country are trained and educated to competently and safely provide the care and treatments contemplated in this legislation. These competencies are reinforced through extensive didactic education, supervised clinical training, and national board examinations prior to licensure. Under the substitute bill, students would also be required to demonstrate proficiency by meeting the same minimum precepted procedural requirements as ophthalmology residents.

In closing, Ohio's optometric licensure standards are strong, comprehensive, and firmly rooted in public protection. As a former Board President, I can state with confidence that safeguarding patients has always been the foundation of optometric regulation in Ohio—and the substitute version of SB 36 continues that tradition while responsibly modernizing patient care.

Thank you for your time, your thoughtful consideration, and your continued commitment to protecting the health and safety of Ohioans.

Respectfully submitted,



Thomas Nye, O.D.

Optometrist, Hamilton, Ohio

Former President, Ohio Vision Professionals Board