



**Testimony of the National Board of Examiners in Optometry to the
Kentucky Board of Optometric Examiners on proposed 201 KAR 5:010.**

July 30, 2026

The National Board of Examiners in Optometry® (NBEEO®)¹ provides this public comment to the Kentucky Board of Optometric Examiners (KBOE) in connection with the proposed amended ordinary regulation that the KBOE filed on April 15, 2026, [201 KAR 5:010](#). NBEEO commends the KBOE for amending Section 1 of this regulation to restore the requirement that all applicants for initial licensure as doctors of optometry demonstrate that they have the required knowledge to pass all parts of the three-part licensure examination series that NBEEO develops, administers, and scores, including the *Treatment and Management of Ocular Disease (TMOD®)* examination, as well as the NBEEO *Injections Skill Exam (ISE®)*.² **However, NBEEO urges the KBOE to take further steps to ensure consistent standards for demonstrated competence for all Kentucky licensed optometrists.**

First, **NBEEO calls for stronger safeguards around laser and surgical procedures** by restricting licensees from engaging in the expanded scope of practice (comprising elective Laser Trabeculoplasty, Laser Peripheral Iridotomy, YAG Capsulotomy, Chalazion Excision, and eyelid surgery) until the candidate has demonstrated competence in these clinical skills through passing NBEEO's *Laser and Surgical Procedures Examination® (LSPE®)*. LSPE is a psychometrically validated examination designed to ensure that optometrists can safely perform these procedures and that they understand injections, anesthesia, contraindications, and management of complications. Candidates must pass both the clinical skills and multiple-choice components to demonstrate necessary psychomotor performance and clinical knowledge to perform these procedures. As NBEEO explained in more detail in a letter to Kentucky's Patient Safety in

¹ NBEEO was established in 1951 by the International Association of Boards of Examiners in Optometry – the precursor of the Association of Regulatory Boards of Optometry (ARBO) – and the Association of Schools and Colleges of Optometry (ASCO) to establish the legitimacy and credibility of the optometry profession. NBEEO is an independent, 501(c)(3) tax-exempt nonprofit organization. The mission of NBEEO is to protect the public through competence assessment.

² In brief, the NBEEO *Part I Applied Basic Science (ABS®)* exam assesses whether optometry candidates demonstrate a baseline of biomedical science knowledge, with a particular focus on the eye and an optics section. The NBEEO *Part II Patient Assessment and Management (PAM®)* exam assesses candidates' clinical thinking and decision-making, with a particularly heavy emphasis on diagnosis and treatment. It includes the *TMOD* section, with an image-intensive, case-based format. Both Part I and Part II are computer-based, multiple choice exams. The NBEEO *Part III Patient Encounters and Performance Skills (PEPS®)* exam is a simulated live patient encounter examination; candidates are presented with a clinical scenario in which they are expected to perform a focused case history, interpret and synthesize clinical data, and generate a management plan for a range of conditions. Importantly for patient safety and proper treatment, candidates are also evaluated on their physical performance of essential optometry skills. The *ISE* exam assesses a candidate's clinical skills in preparing for and performing intravenous and intramuscular injections.

Expanded Therapeutic Procedures Workgroup,³ this testing is critical in a context where errors can permanently damage or even blind a patient. Therefore, NBEO strongly urges the KBOE to make passage of LSPE a prerequisite for authorization to perform optometric laser and surgical procedures both for new licensees (whether through initial licensure application or licensure by endorsement) and for credentialing for expanded therapeutic practice for currently practicing optometrists. Education and supervised practice are important, but without requiring passage of LSPE, the KBOE lacks a consistent, objective, and defensible way to ensure that every optometrist performing these advanced procedures in Kentucky has proven they are competent to do so safely. These changes could be implemented through further amendments to 201 KAR 5:010 with respect to new Kentucky licensees (whether through examination or endorsement) or by new amendments to [201 KAR 5:110](#).

Second, **NBEO urges the KBOE to amend Section 2 of 201 KAR 5:010 to limit licensure by endorsement only to experienced candidates who both hold an active optometry license from another state and have passed the same NBEO examinations that the KBOE requires unlicensed candidates to pass.** NBEO strongly urges the KBOE to hold *all* Kentucky optometrists to a consistent standard of demonstrating their competence to safely engage in the independent practice of optometry. It has now come to light that at least one other state has waived national testing requirements.⁴ In addition, the KBOE has demonstrated through its proposed amended regulation that it views passage of the full three-part NBEO initial licensure examination series, TMOD, and ISE as necessary evidence of qualifications to engage in the independent practice of optometry in the Commonwealth. Holding out-of-state applicants to a lower standard does not promote patient protection. Requiring proof of passage of the NBEO exams is the only way to ensure a single, consistent standard of clinical competence for all Kentucky optometrists. Currently, the regulation requires applicants for licensure by endorsement to provide proof of other qualifications for initial licensure, such as college transcripts and optometry school transcripts, rather than treating another state's optometry license as evidence that these educational prerequisites have been met. Proof of passage of NBEO examinations should likewise be a requirement for these candidates.

NBEO has repeatedly advocated for the KBOE to take steps to ensure that all licensed optometrists in Kentucky have demonstrated that they meet the same standards of knowledge, clinical skills, and core competencies to practice independently. In prior public comments, NBEO has similarly called on the KBOE to amend 201 KAR 5:021E and its companion proposed ordinary regulation, 201 KAR 5:021, **to require passing scores on all three parts of the NBEO initial licensure exam series as a condition of renewal of licensure for any licensed optometrists who were granted a license through a waiver or acceptance of an alternative examination.**⁵ By adopting all of these regulatory changes, the KBOE can protect the health and vision of Kentucky residents and restore public confidence in Kentucky optometrists.

³ See <https://optometry.org/wp-content/uploads/2026/05/NBEO-letter-to-Kentucky-Workgroup.pdf>.

⁴ See <https://oklahomavoice.com/2026/06/22/waived-exam-requirements-for-oklahoma-optometrists-cause-grave-concern-to-national-testing-group/>.

⁵ See [NBEO testimony to KBOE 3.25.2026 meeting on 201 KAR-5 021E fv.pdf](#) and [NBEO testimony to KBOE for -4.24.2026 meeting on 201 KAR 5 021 proposed ordinary regulation.pdf](#).