

What is not generally known is that the American Optometric Association has a firmly-established and long-standing resolution on its books opposing the licensing of opticians. It is not generally known that optometrists have opposed bills to license opticians in state legislatures more than 50 times. Nor is it generally known that optometry has taken legal action against dispensing opticians hundreds of times for the so-called unlawful practice of optometry under laws which were enacted primarily to regulate the refractive aspects of optometry.

In February of this year the Guild of Prescription Opticians sponsored a national seminar here in Washington on the subject of licensing of opticians and invited every organization interested in the subject to present its views. Every organization, regardless of its views, accepted our invitation except the American Optometric Association whose Board of Trustees voted not to participate. The seminar dates were changed so that it would not conflict with optometric meetings but not reason was given for not participating. Does this suggest that the optometric policy cannot stand the "light of day"? They dismiss all discussion on the licensing of opticians with the statement that such licensing is not in the public welfare, that there is no public need for it. Yet optometry is adamant that dispensing opticians be regulated under an optometry bill such as 12276.

Does not this list of facts suggest an unspoken reason for regulating dispensing opticians under this bill? If it is the public that optometry is interested in, then put a clause in this bill stating this Act shall not apply to dispensing opticians, period. Then simultaneously, let the American Optometric Association declare itself in favor of licensing of opticians and let both the American Optometric Association and the District of Columbia Optometric Society unequivocally support a concurrent dispensing optician's bill solely for the regulation of opticians.

The evidence submitted substantiates the statement that optometry seeks to monopolize the field of eyecare in the District of Columbia through this bill.

Before concluding, I wish to call attention to the efforts which opticians and the District of Columbia government are making toward the regulation of opticians.

Briefly, here's the story. The Corporation Counsel's office has given an opinion that the Commissioners have the power to issue regulations for opticians. This opinion dated July 27, 1966 is submitted as Exhibit D. The Department of Occupations and Professions has drafted a proposed set of regulations for opticians and has forwarded them to the Commissioners as an attachment to a memorandum dated April 5, 1967. A copy of this memorandum and attachment is submitted as Exhibit E. Our groups have worked closely with the Department of Occupations and Professions in drawing up these regulations and together we have ironed out most of the major problems. Our revision of the proposed regulations was prepared by Robert W. Burton, Counsel for the Guild of Prescription Opticians of Washington, D.C., and is submitted as Exhibit F. In this exhibit there is the method I referred to earlier for establishing the qualifications of opticians who fit contact lenses and for regulating the fitting of contact lenses by opticians.

I draw these regulations to your attention because we feel it highly desirable that opticians be regulated. We have made substantial progress. While we have no objections to updating the existing optometry law, we do strongly object to having the practice of opticianry controlled by an optometry law which virtually monopolizes the field. We strongly object to defining optometry and regulating it as though it and it alone bears the sole responsibility for the eyecare of the people of the District of Columbia. We strongly object to the bill treating dispensing opticians almost as though they did not exist, while taking away from opticians much of their essential and traditional practice under the guise that all the areas I have discussed are solely optometric in character and subject solely to optometric regulation. Opticians are proud of their heritage. They are proud of the service they have rendered in the District of Columbia. They want to be able to continue this service, and improve this service if and as necessary, but they want it done under their own regulations or law.

Opticians must and will oppose these bills and any other bills which contain the proposed all-encompassing definition of optometry in Section 3, and which contain the inadequate language of the non-applicability clause in Section 9(c). We had submitted amending language to both sections with my letter of March 31, 1966, and we respectfully request the adoption of such amendments should the committee decide for any reason to take favorable action on any of the pending bills.

I want to single out for your special attention our proposed amendment to Section 9 paragraph (c). It reads: