



U.S. Department
of Veterans Affairs

NATIONAL STANDARD OF PRACTICE: OPHTHALMOLOGY TECHNICIAN

December 2023

PURPOSE: This report provides a summary of internal and external feedback received for the VA Ophthalmology Technician national standard of practice during the comment period from July to September 2022.

Table of Contents

EXECUTIVE SUMMARY	3
AUTHORITY	4
PURPOSE	4
DEVELOPMENT PROCESS.....	5
VA OPHTHALMOLOGY TECHNICIANS: FEEDBACK SUMMARY	6
CERTIFICATION BODY FEEDBACK.....	7
PUBLIC AND VA EMPLOYEE FEEDBACK.....	8
CONCLUSION	11
APPENDIX A: DRAFT NATIONAL STANDARD OF PRACTICE FOR OPHTHALMOLOGY TECHNICIANS.....	12
APPENDIX B: VA UNDER SECRETARY FOR HEALTH LETTERS	13

Executive Summary

The Department of Veterans Affairs (VA) is establishing national standards of practice for health care professionals who have a license, certification, registration, or other State requirement. The VA national standards of practice are a standardized set of services that all health care professionals in a given occupation can perform while employed by VA if their VA medical facility performs such services and they have the proper education, training, and skill to perform the services. As part of a comprehensive development process to establish each occupation's national standard of practice, VA affords the public, Veterans, professional associations, VA employees, and other interested parties the opportunity to provide feedback on the proposed national standard of practice prior to finalization and publication in VA policy.

Ophthalmology Technicians are eye health care professionals qualified to assist ophthalmologists in the diagnostic evaluation, management, treatment, and education of patients with medical and surgical conditions affecting the visual system. On July 29, 2022, VA sent a letter to the Joint Commission on Allied Health Personnel in Ophthalmology (JCAHPO) to confirm VA's intent to follow its certification standards. In addition, from July 29 to September 27, 2022 VA posted the proposed national standard of practice for VA Ophthalmology Technicians on the Federal Register ([87 FR 45853](#)) for public comment and within VA's intranet for VA employee comment.

The proposed national standard of practice for Ophthalmology Technicians received 54 total comments across all platforms—52 comments from VA employees and two on the Federal Register from professional associations (the American Optometric Association and the American Academy of Ophthalmology). JCAHPO did not provide any feedback. VA reviewed all comments received and made one change to the Ophthalmology Technician national standard of practice in response to comments.

This report provides a summary of comments received on the proposed Ophthalmology Technician national standard of practice. It also provides VA's responses to the comments and changes made to the national standard of practice in response to feedback received.

Authority

Chapters 73 and 74 of the title 38 of the United States Code (U.S.C.) and 38 U.S.C. 303 permit the Secretary to further regulate the Department of Veterans Affairs health care professions to make certain that VA's health care system provides safe and effective health care by qualified health care professionals to ensure the well-being of those Veterans who have borne the battle.

On November 12, 2020, VA published an interim final rule confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any State license, registration, certification, or other State requirements that unduly interfere with their practice. 38 CFR 17.419; 85 FR 71838. Specifically, this rulemaking confirmed VA's current practice of allowing VA health care professionals to deliver health care services in a State other than the health care professional's State of licensure, registration, certification, or other State requirement, thereby enhancing Veterans' access to critical VA health care services. The rulemaking also confirmed VA's authority to establish national standards of practice for its health care professionals which would standardize a health care professional's practice in all VA medical facilities, regardless of conflicting State laws, rules, regulations, or other State requirements.

The rulemaking explained that a national standard of practice describes the tasks and duties that a VA health care professional practicing in the health care profession may perform and may be permitted to undertake. Having a national standard of practice means that individuals from the same VA health care profession may provide the same type of tasks and duties regardless of the State where they are located or the State license, registration, certification, or other State requirement they hold. VA emphasized in the rulemaking and reiterates here that VA will determine, on an individual basis, that a health care professional has the proper education, training, and skills to perform the tasks and duties detailed in the national standard of practice and that they will only be able to perform such tasks and duties after they have been incorporated into the individual's privileges, scope of practice, or functional statement. The rulemaking explicitly did not create any such national standards and directed that all national standards of practice would be subsequently created via policy.

As authorized by 38 CFR 17.419, VA is developing national standards of practice via policy. There will be one overarching national standard of practice directive that will generally describe the Veterans Health Administration (VHA) policy; individual national standard of practice will be an appendix to the directive. The directive and all appendices will be accessible on the VHA Publications website at: <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published.

Purpose

As the Nation's largest integrated health care system, it is critical that VA develops national standards of practice to ensure first, beneficiaries receive the same quality care regardless of where they enter the system and second, that VA health care professionals can efficiently meet the needs of beneficiaries when practicing within the scope of their VA employment. National

standards are designed to increase beneficiaries' access to safe and effective health care, thereby improving health outcomes.

The importance of this initiative has been underscored by the coronavirus disease 2019 (COVID-19) pandemic. The increased need for mobility in VA's workforce, including through VA's Disaster Emergency Medical Personnel System, highlighted the importance of creating uniform national standards of practice to better support VA health care professionals who practice across State lines. As a national health care organization, VA often has health care professionals primarily based out of a VA medical center in one State travel to smaller community-based outpatient clinics in neighboring States to ensure access to care for Veterans.

Creating national standards of practice also promotes interoperability of medical data between VA and Department of Defense (DoD), providing a complete picture of a veteran's health information and improving VA's delivery of health care to our Nation's veterans. DoD has historically standardized practice for certain health care professionals, and VA has closely partnered with DoD to learn from their experience.

As a national health care system, it is also imperative that VA can recruit and retain health care professionals, to ensure there is access to health care regardless of where the Veteran resides. VA needs the flexibility to hire qualified health care professionals from any State to meet the staffing needs of a VA medical facility where recruitment or retention is difficult. This flexibility is especially beneficial in recruiting spouses of active service members who frequently move across the country and can be subject to delays in starting new employment due to needing to obtain an additional State requirement to practice in the new State.

Development Process

To develop VA's national standards of practice, VA is using a robust, interactive process that adheres to the guidelines outlined in [Executive Order \(EO\) 13132](#) to preempt conflicting State laws, rules, regulations, or other requirements. All standards undergo a deliberate review process, both within VA and externally, to ensure that the draft national standard is consistent with VA's team-based approach to care, results in the highest quality of care for Veterans, is implementable on an enterprise level, and is legally supportable. The process includes consultation with internal and external stakeholders, including State licensing boards, VA employees, professional associations, Veterans Service Organizations, labor partners, and others.

For each identified VA occupation, a workgroup comprised of health care professionals in the identified occupation conducts research to identify internal best practices that may not be authorized under every State license, certification, registration, or other State requirement, but would enhance the practice and efficiency of the profession throughout VA. If a best practice is identified that is not currently authorized by every State, the workgroup determines what education, training, and skills are required to perform such task or duty. The workgroup then drafts a proposed VA national standard of practice using the data gathered during the research and incorporates internal stakeholder feedback into the standard. The workgroup may consult with internal or external stakeholders at any point throughout the process.

The proposed national standard of practice is internally reviewed, to include by an interdisciplinary workgroup consisting of representatives from Quality Management; VA Medical Center Chief of Staff; Academic Affiliates; Veterans Integrated Services Network (VISN) Chief Nursing Office; Ethics; Workforce Management and Consulting; Surgery; Credentialing and Privileging; VISN; and Electronic Health Record Modernization.

Externally, the proposed national standard of practice is provided to our partners in DoD as a notification and opportunity to flag inconsistencies with DoD standards. In addition, VA labor partners are engaged informally as part of a pre-decisional collaboration. Consistent with EO 13132, a letter is sent to each State board and certifying organization or registration organization, as appropriate, which includes the proposed national standard and offers the recipient an opportunity to discuss the national standard with VA. After the States and certifying organizations, or registration organizations have received notification, the proposed national standard of practice is posted to the Federal Register for 60 days to obtain feedback from the public, professional associations, and any other interested parties. At the same time, the proposed national standard is posted to an internal VA site to obtain feedback from VA employees. Responses received through all vehicles—from State boards, professional associations, unions, VA employees, and any other individual or organization who provides comments via the Federal Register—will be reviewed. VA will make appropriate revisions in light of the comments, including those that present evidence-based practice and alternatives that help VA meet our mission and goals. VA may also make additional changes outside the scope of the comments during its own internal review processes after the conclusion of the comment period. This document provides a summary of the comments received and VA's response to the comments.

VA Ophthalmology Technicians: Feedback Summary

VA Ophthalmology Technicians are eye health care professionals qualified to assist ophthalmologists in the diagnostic evaluation, management, treatment, and education of patients with medical and surgical conditions affecting the visual system. Ophthalmology Technicians work on documenting patient histories, assessing visual and ocular function, performing tests and ophthalmic imaging, administering topical ocular medications (i.e., drops or ointment, including anesthetic, dye, dilation, cycloplegic, or antibiotics), and providing patient care. Ophthalmology Technicians are integral members of the VA eye care team.

VA's proposed national standard of practice for Ophthalmology Technicians did not preempt any current State requirements and instead proposed to confirm that all VA Ophthalmology Technicians follow the Certification for Ophthalmology Technicians from the Joint Commission on Allied Health Personnel in Ophthalmology (JCAHPO). Currently, all VA Ophthalmology Technicians follow this standard; therefore, there would be no change in practice for any Ophthalmology Technician in VA.

On July 29, 2022, VA posted the proposed VA national standard of practice for Ophthalmology Technicians on the [Federal Register](#) (87 FR 45853) and within VA's intranet for public and employee feedback, respectively. The proposed national standard of practice remained open for comment for 60 days, through September 27, 2022. A copy of the national standard of practice for Ophthalmology Technicians that was posted for feedback is in [Appendix A](#).

The Under Secretary for Health also sent a letter to JCAHPO to confirm VA's intent to continue to follow its certification standards and provide them with an opportunity to provide feedback directly to VA. A copy of that letter is in [Appendix B](#).

VA specifically sought feedback on five areas:

1. *Are there any required trainings for the aforementioned practices that we should consider?*
2. *Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any State?*
3. *Is there any variance in practice that we have not listed?*
4. *What should we consider when preempting conflicting State laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*
5. *Is there anything else you would like to share with us about these national standards of practice?*

Commenters internal to the VA could, in addition to leaving specific comments and suggestions, choose to provide concurrence or non-concurrence on the proposed VA national standard of practice. Concurrence denotes overall agreement with the VA standard while non-concurrence denotes that the VA standard in its original form presents significant clinical, legal, or patient safety concerns. Employees could also select not applicable if the VA standard of practice did not pertain to their area of expertise.

The proposed VA national standard of practice for Ophthalmology Technicians received 2 comments on the Federal Register from professional clinical associations, 52 comments from VA employees, and no feedback from the national certification body, JCAHPO. Out of the 52 employee comments, there were 41 employees who *concurred*, 2 employees who *non-concurred*, and 9 employees who selected *not applicable*.

Certification Body Feedback

As stated above, VA sent a letter to the Ophthalmology Technician certification body, JCAHPO, on July 29, 2022. JCAHPO did not provide any feedback on the proposed standard of practice for Ophthalmology Technicians.

Professional Association Feedback

Comment: VA received feedback from two professional associations via the Federal Register on the proposed standard for Ophthalmology Technicians. The American Academy of Ophthalmology expressed full support for the proposed VA national standard of practice because it is consistent with the high standards set by JCAHPO. The American Optometric Association issued their support for the development of a VA national standard; however, they suggested updating the VA occupation title to align with JCAHPO and clarify that Ophthalmology Technicians can work collaboratively with both optometrists and ophthalmologists.

Response: VA agrees with the suggestion from American Optometric Association and revised the national standard of practice to note that VA Ophthalmology Technicians are qualified to assist ophthalmologists and other licensed independent eye care practitioners.

Public and VA Employee Feedback

All commenters had the opportunity to provide responses to the five areas on which VA solicited feedback, and VA responds to any questions or concerns raised by the commenters in response to those areas below.

VA received comments from employees that were supportive of the proposed VA national standard of practice for Ophthalmology Technicians, as well as comments that were out of scope. VA does not further address these comments below.

“In general, I agree with the proposed requirements.” — Comment from VA employee

1. Are there any required trainings for the aforementioned practices that we should consider?

Comments: Some employees provided examples of courses available for Ophthalmology Technicians to obtain continuing education credits. A few suggested that VA consider more advanced or specialized ophthalmic certifications from JCAHPO, as well as the Accreditation Council on Optometric Education Technician Program and the American Optometric Association Paraoptometric Certification.

Response: Specialized training and certifications are supplementary and optional for VA Ophthalmology Technicians who are interested in advancing their skills. The VA qualification standards, VA Handbook 5005, Staffing, set the minimum training and certification requirements for Ophthalmology Technicians. The national standard of practice for Ophthalmology Technicians does not change the certification required per these qualification standards. VA ensures that all Ophthalmology Technicians have the appropriate education and training before they are credentialed to perform any tasks.

2. Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any State?

Comments: Employees expressed concerns about how the national standard of practice would impact Ophthalmology Technicians who were hired into the position prior to the current VA qualification standards that require Ophthalmology Technicians to have a JCAHPO certification (known as being “grandfathered”).

Response: As stated in VHA Directive 1900, VA National Standards of Practice, national standards of practice apply to employees grandfathered into their respective positions unless otherwise noted in the national standard. VA Handbook 5005, Staffing, Part II, Appendix G51 includes a grandfathering provision for Ophthalmology Technicians who, on the effective date of the qualification standard, were considered to have met all VA qualification requirements for the title, series, and grade-held, including education and registration, that are part of the basic requirements of the occupation. As the national standard of practice does not state otherwise, Ophthalmology Technicians who have been grandfathered into the position per the qualification standards will still practice as outlined in the national standard of practice.

Comments: Several employees commented that they are concerned the NSP will require non-certified technicians to become certified prior to gaining employment at VA. Some employees suggested there should be a time limit for non-certified technicians to become certified at the minimum level from JCAHPO, while others stressed the importance of hiring non-certified technicians on a developmental level since there is a lack of certified technicians in many areas.

Response: VA qualification standards, as more specifically described in VA Handbook 5005, Staffing, will not change as a result of the national standards of practice. All national standards of practice confirm the respective qualification standards in the second paragraph. The VA qualification standards for Ophthalmology Technicians permit non-certified applicants to be appointed while working to gain certification within two years from the date of appointment. VA reiterates that the qualification standards are not changing due to the implementation of the national standards of practice.

Comments: Other employees expressed concerns that Ophthalmology Technicians who are grandfathered into the position without JCHAPO certification do not have the knowledge and skill level needed to continue safely practicing.

Response: In 2018, all employed Ophthalmology Technicians were reviewed to confirm that they met the grade requirement, General Schedule (GS)-8, in the qualification standards. All Ophthalmology Technicians who were grandfathered into the position met the experience level required to meet the GS-8 grade in the qualification standards and further continue to demonstrate their competencies at the local level.

3. Is there any variance in practice that we have not listed?

Comments: An employee suggested that the VA national standard of practice could also include measuring intraocular pressure. One employee suggested documenting competencies related to medication administration, and another further suggested that all VA Ophthalmology Technicians should be able to place dilating and anesthetic drops for in-office use. The American Optometric Association suggested clarifying that Ophthalmology Technicians do not manage or treat patients, instead assist Ophthalmologists and Optometrists in carrying out management and treatment plans. Additionally, the American Academy of Ophthalmology provided examples of tasks Ophthalmology Technicians can perform, such as measuring refractive error of patients, administering topical eye drops, and assisting the physician in-person with minor procedures.

Response: The national standard of practice is not intended to provide an exhaustive list of all duties and practices a health care professional (in this case, a VA Ophthalmology Technician) may perform. VA appreciates the support from the American Academy of Ophthalmology and notes that while not listed in the national standard of practice, a VA Ophthalmology Technician can perform those tasks. All VA Ophthalmology Technicians, under direction of the physician, can measure intraocular pressure and administer diagnostic drops and select therapeutic drops, such as antibiotics for in-office procedures. VA Ophthalmology Technicians do not manage or treat patients. An Optometrist or Ophthalmologist develops the management and treatment plan, and the Ophthalmology Technician assists in carrying out these plans.

4. What should we consider when preempting conflicting State laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?

Comment: One employee suggested eliminating the need for a physician co-signature when the Ophthalmology Technician documents a patient interaction or examination findings.

Response: At VA, a final physician signature is required to close the encounter and document supervision of the technician-patient interaction because Ophthalmology Technicians are not independent practitioners. Therefore, VA is not preempting any State requirements regarding supervision of Ophthalmology Technicians.

5. Is there anything else you would like to share with us about these national standards of practice?

Comments: Multiple employees, as well as the American Optometric Association, expressed concern regarding clarity on whom Ophthalmology Technicians assist. These commenters suggested that the phrasing in the national standard of practice would be more accurate if it included other licensed eye care providers, instead of only including Ophthalmologists.

Response: VA agrees with the comments that Ophthalmology Technicians support all licensed eye care providers and revised the VA national standard of practice, based on these comments, to state that VA Ophthalmology Technicians are qualified to assist ophthalmologists and other licensed independent eye care practitioners.

Comments: Some employees also outlined the different levels of certification from JCAHPO—Certified Ophthalmic Assistant (COA), Certified Ophthalmic Technician (COT), and Certified Ophthalmic Medical Technologists (COMT)—and suggested that VA should not mandate which level of certification an Ophthalmology Technician should have. Another commenter suggested that the level of certification be stratified with the GS levels. For example, those with a COA certification would be a GS-8 and those with a COT would be a GS-9.

Response: VA qualification standards, as defined by the Office of Personnel Management, require that Ophthalmology Technician applicants become certified, at minimum, at the COA level with JCAHPO. National standards of practice do not change VA qualification standards. GS levels are not different based on certification because an increase in grade is determined by the individual performing different work (e.g., routinely do advanced testing or supervisory duties), as governed by VA qualification standards. VA Handbook 5005, Staffing, dated February 4, 2022, provides further information.

Comments: A few employees and the American Optometric Association provided suggestions for changing the VA occupation title to “Ophthalmic Technician” to make it clearer that the occupation can assist all eye care practitioners and align with JCAHPO terminology. Some employees alternatively suggested changing the title to “Ophthalmic Health Personnel” or “Allied Ophthalmic Personnel”, to remove the word “technician”.

Response: VA appreciates the suggestions; however, it is choosing not to make changes to the occupation title to ensure consistency with how the occupation is referred to within VA. VA uses the title “Ophthalmology Technician” in the national standard of practice to be consistent with the VA qualification standards, which uses the title “Health Technician (Ophthalmology).” Health Technician is an occupational category in VA and the type of technician is differentiated by the term it is paired with in parentheses. For specificity in the national standard of practice, VA chose to use Ophthalmology Technician, which differentiates it from other Health Technicians in this category because, as noted, qualification standards at VA require that Ophthalmology Technicians hold a certification.

Conclusion

VA considered all comments received, and as a result, VA is making one change to the first paragraph of the VA standard of practice to clarify that Ophthalmology Technicians are qualified to assist both ophthalmologists and other licensed independent eye care practitioners.


The final national standard of practice for Ophthalmology Technicians will be an appendix to VHA Directive 1900, VA National Standards of Practice and accessible on VHA Publications website at: <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published. In accordance with VHA’s national policy process, the national standard of practice will be reviewed and recertified on a five-year cycle.

Appendix A: Draft National Standard of Practice for Ophthalmology Technicians

Appendix A includes the draft national standard of practice for Ophthalmology Technicians posted to the Federal Register and within VA on July 29, 2022, for individuals to provide feedback on. The final national standard of practice for Ophthalmology Technicians is written into VHA Directive 1900, VA National Standards of Practice, posted at <https://www.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external).

1. Ophthalmology Technicians are eye health care professionals qualified to assist ophthalmologists in the diagnostic evaluation, management, treatment, and education of patients with medical and surgical conditions affecting the visual system. Their duties include, but are not limited to, documenting patient histories, assessing visual and ocular function, performing tests and ophthalmic imaging, administering topical ocular medications (i.e., drops or ointment, including anesthetic, dye, dilation, cycloplegic or antibiotics), and providing patient care.
2. Ophthalmology Technicians in VA possess the required education and certification from JCAHPO, in accordance with VA qualification standards, as more specifically described in VA Handbook 5005, Staffing, Part II, Appendix G52.
3. This national standard of practice confirms Ophthalmology Technicians practice in accordance with the Allied Ophthalmic Personnel Certification standards from JCAHPO available at: <https://jcahpo.org/>. As of August 2021, Ophthalmology Technicians in all States follow this national certification.

Appendix B: VA Under Secretary for Health Letters

Letter	Organization	Responded to VA
 JCAHPO - Ophthalmology Tchr	Joint Commission on Allied Health Personnel in Ophthalmology	No