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PENNSYLVANIA OPTOMETRIC ASSOCIATION

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AFFILIATED WITH THE AMERICAN OPTOMETRIC ASSOCIATION

March 19, 2003

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Health Licensing Boards

Ms. Deborah Smith, Board Administrator
State Board of Optometry
P.O. Box 2649
Harrisburg, PA 17105

RE: Comments of the Pennsylvania Optometric Association regarding the proposed rulemaking under 49 Pa. Code Chapter 23, Continuing Education.

Dear Ms. Smith:

The Pennsylvania Optometric Association (POA) received notice that the State Board of Optometry proposes to amend section 23.82, Continuing education hour requirements. The POA fully supports the requirement of a minimum of 30 hours of continuing education, of which 6 of those 30 hours must concern the prescription and administration of pharmaceutical agents for therapeutic purposes, for biennial license renewal or reactivation. The POA also supports the State Board's authority to waive the requirements of continuing education in cases of certified illness or undue hardship.

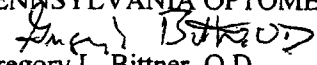
In addition, the POA is in full support of the disciplinary process imposed on an optometrist who fails to meet the continuing education requirements under 63 P.S. §244.7(e).

The POA supports the proposed amendment that notifies optometrists that the courses relating to administration and prescription of pharmaceutical agents for therapeutic purposes shall provide instruction regarding the treatment and management of ocular or oculo-systemic disease.

The POA requests that the final form regulation and comment and response documents are forwarded to us, and that we continue to be kept apprised of all future correspondence relating to this matter.

Thank you for your continued support.

Sincerely,
PENNSYLVANIA OPTOMETRIC ASSOCIATION


Gregory L. Bittner, O.D.,
President

GB/alz

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MAR 25 2003

DOS LEGAL COUNSEL

Gregory L. Bittner, O.D.
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