



May 11, 2026

Dear Members of the Administrative Regulation Review Committee,

As Immediate Past-President of the Kentucky Optometric Association and KOA Legislative Committee Chair, I write to express the KOA Board's support for 201 KAR 5:021E, filed by the Kentucky Board of Optometric Examiners (KBOE). This emergency regulation establishes the KBOE's licensure review of a small group of practicing optometrists, in response to an Office of Attorney General Opinion (OAG 25-13).

Patient safety is our primary concern. We feel the licensure review established in 201 KAR 5:021E provides a balanced approach, which demonstrates the KBOE's commitment to protecting patient safety and provides a fair competency review for the impacted optometrists. Further, we are in support of the amendments that were filed by the KBOE after the completion of the public comment process – which removed the OEBC/Canadian test option effective April 15, 2026.

What the Licensure Review Requires:

Per 201 KAR 5:021E, the impacted optometrists must provide passage of the following before they can renew their license in 2027:

1. NBEO Part I;
2. NBEO Part II and TMOD; and
3. NBEO Part III or ABO Board Certification Examination.

Additionally, no impacted optometrist may perform any laser procedures until the KBOE receives the above information. This is despite the additional credentialing already required for an optometrist to perform lasers.

Why the Licensure Review is Appropriate:

The optometrists subject to this licensure review are practicing optometrists who met the KBOE's licensure requirements in place at that time. The AG Opinion held that the KBOE did not follow the proper administrative process to make these licensure changes. These errors should not be held against the impacted licensees. Several impacted licensees never failed a licensure test and now have their competency incorrectly challenged.

Why Utilization of the American Board of Optometry (ABO) Certification Examination is Appropriate:

The ABO exam is an ideal option for the impacted optometrists to demonstrate competency to the KBOE. It is not being used as a licensure test by the KBOE, because these individuals are already licensed. The ABO exam is designed specifically to measure existing competency for practicing optometrists which exceed initial licensure requirements. Further, an optometrist must meet rigorous prerequisites before even qualifying to take the exam.

I have also included a list of optometrists who specifically asked to be included in this letter of support. These optometrists are members of the KOA grassroots network, and represent only a small portion of our overall membership and the many Kentucky optometrists who support this regulation.

Thank you for your consideration and I am available to answer questions at any time.

Sincerely,

A handwritten signature in black ink that reads "Hannah Huffman, O.D.".

Hannah Huffman, O.D.

KOA Immediate Past-President and KOA Legislative Committee Chair

Brett Abney, OD* Leitchfield, KY	Max Downey, OD* Columbia, KY	Tyler Hudson, OD* Walton, KY	Matt Mooney, OD Mt. Washington, KY
Julie Aubuchon, OD* Florence, KY	Rosemary Emmick, OD Hawesville, KY	David Jaco, OD* Murray, KY	Laurel Morris, OD Benton, KY
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CJ Bertke, OD Edgewood, KY	Jessica Finch, OD Louisville, KY	Brian Keplinger, OD Georgetown, KY	Darren Patrick, OD Louisville, KY
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Leslie Cecil, OD*^ Bardstown, KY	Kefah Habash, OD Georgetown, KY	Kimberly Mayo, OD^ Walton, KY	Michael Smith, OD* Danville, KY
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Alex Compton, OD^ Franklin, KY	John Heltsley, OD*^ Hopkinsville, KY	Ryan McGiffen, OD Mt. Washington, KY	TeShawna Sutton, OD* London, KY
Steve Compton, OD* Franklin, KY	Brett Hines, OD Cynthiana, KY	Aaron McNulty, OD* Louisville, KY	Trina Warden, OD Bowling Green, KY
Elaine DeSario, OD Louisa, KY	Paula Hoover, OD Frankfort, KY	Bryan Metzger, OD Alexandria, KY	Sarai Williams, OD Columbia, KY
David Ditto, OD Nicholasville, KY	John Houston, OD Shelbyville, KY	Emily Meister, OD^ Middlesboro, KY	Stuart Young, OD Shelbyville, KY

** Past KOA President*
^ Current KOA Board Member