



# Board Meeting Materials

Friday, September 18, 2020

1:00 p.m. until close of business

Online via WebEx Events

California State Board of Optometry  
2450 Del Paso Road, Suite 105  
Sacramento, CA 95834  
916-575-7170 [optometry.ca.gov](http://optometry.ca.gov)

**MEMBERS OF THE BOARD**

Mark Morodomi, JD, President  
Glenn Kawaguchi, OD, Vice President  
Debra McIntyre, OD, Secretary  
Cyd Brandvein  
Jeffrey Garcia, OD  
David Turetsky, OD  
Lillian Wang, OD  
Vacant, Public Member  
Vacant, Public Member  
Vacant, Public Member  
Vacant, Licensed Member



**BOARD MEETING AGENDA**

**Verifying Applicant Competency to Practice Optometry  
During the Current Coronavirus-related State of Emergency**

Friday, September 18, 2020  
1:00 p.m. until the close of business

This public meeting will be held via WebEx Events. To participate in the Webex meeting, please log on to the website on the day of the meeting using the links below.

<https://dca-ca.webex.com/dca-ca/onstage/g.php?MTID=e96c76be51f562459e34d89d0cc03ef98>

Event Number: 145 017 0873      Event Password: CSBO09182020

**NOTICE:** Pursuant to Governor Gavin Newsom's Executive Order N-29-20, in response to the COVID-19 pandemic, the meeting is being held entirely electronically. No physical public location is being made available for public participation. Members of the public may observe or participate using the link above. Due to potential technical difficulties, please consider submitting written comments via email prior to the meeting: [optometry@dca.ca.gov](mailto:optometry@dca.ca.gov)

Action may be taken on any item on the agenda.

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**1. Call to Order / Roll Call and Establishment of a Quorum**

**2. Public Comment for Items Not on the Agenda**

*Note: The Board may not discuss or take action on any matter raised during this public comment section, except to decide whether to place the matter on the agenda of a future meeting [Government Code Sections [11125](#), [11125.7\(a\)](#)]*

**3. Introduction of New Board Member – Dr. Jeffrey Garcia, O.D.**

**4. Presentation by the Office of Professional Examination Services (OPES)**

- a. NBEO Examinations and California Optometry Laws and Regulations Examination
- b. Summary of Policy and Legal Mandates
- c. Examples of Other Board Examinations Impacted by COVID-19

**d. Examples of DCA Waivers Granted in Response to COVID-19**

- 5. Discussion of Presentation by Optometry College/School Deans and California Optometric Association Regarding Need for Accommodations and Impacts to Students**
  - 6. Discussion of Alternatives to the NBEO Exam for 2021 Graduates/Licensure Applicants**
  - 7. Discussion of Consumer, Applicant and Employment Impacts and Possible Action to Adopt a Plan for Alternate Competency Verification**
  - 8. Adjournment**
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Meetings of the California State Board of Optometry are open to the public except when specifically noticed otherwise in accordance with the Bagley-Keene Open Meeting Act. Public comments will generally be taken on agenda items at the time the specific item is raised. Time limitations will be determined by the Chairperson. The Board may take action on any item listed on the agenda, unless listed as informational only. Agenda items may be taken out of order to accommodate speakers and to maintain a quorum.

The meeting is accessible to the physically disabled. A person who needs a disability-related accommodation or modification in order to participate in the meeting may make a request by contacting the Board at 916-575-7170, email [optometry@dca.ca.gov](mailto:optometry@dca.ca.gov) or mailing a written request to Kristina Eklund at the California State Board of Optometry, 2450 Del Paso Road, Suite 105, Sacramento, CA 95834. Providing your request at least five (5) business days before the meeting will help ensure availability of the requested accommodation.



## ISSUE MEMORANDUM

<b>DATE</b>	September 18, 2020
<b>TO</b>	Members, California State Board of Optometry (CSBO)
<b>FROM</b>	Mark Morodomi, President
<b>SUBJECT</b>	Agenda Item #1 – Call to Order/Roll Call and Establishment of a Quorum

Board President Mark Morodomi will call the meeting to order. Please note the date and time for the record. Also please note the meeting being held is via teleconference pursuant to the Governor’s Executive Order NO-29-20.

Board Secretary Debra McIntyre, will call roll to establish a quorum of the Board.

- Mark Morodomi
- Glenn Kawaguchi O.D.
- Cyd Brandvein
- Jeffrey Garcia, O.D.
- Debra McIntyre O.D.
- David Turetsky O.D.
- Lillian Wang O.D.



## ISSUE MEMORANDUM

<b>DATE</b>	September 18, 2020
<b>TO</b>	Members, California State Board of Optometry (CSBO)
<b>FROM</b>	Mark Morodomi, Board President
<b>SUBJECT</b>	Agenda Item #2 – Public Comment for Items Not on the Agenda

The Board welcomes public comment for items not on the agenda.

**Please note:** The Board may not discuss or take action on any matter raised during this public comment section, except to decide whether to place the matter on the agenda of a future meeting (Government Code Sections 11125, 11125.7(a))



## ISSUE MEMORANDUM

<b>DATE</b>	September 18, 2020
<b>TO</b>	Members, California State Board of Optometry (CSBO)
<b>FROM</b>	Mark Morodomi, President
<b>SUBJECT</b>	Agenda Item #3 - Introduction of New Board Member – Dr. Jeffrey Garcia, O.D.

The Board is pleased to welcome a new Board member, Dr. Jeffrey Garcia.

From the Governor's press release:

**Jeffrey Garcia** of Hanford, has been appointed to the California Board of Optometry by Governor Gavin Newsom. Garcia is an optometrist and has been owner of Family Eye Care Optometry since 1996. He was department head and an optometrist for the U.S. Navy from 1993 to 1996 and an O6 active reserve from 1985 to 2018. Garcia is a member of the American Optometric Association. He earned a Doctor of Optometry degree from the Southern California College of Optometry. This position does not require Senate confirmation and the compensation is \$100 per diem. Garcia is registered without party preference. **(Term: 8/10/2020 through 6/1/2023)**



# ISSUE MEMORANDUM

<b>DATE</b>	September 18, 2020
<b>TO</b>	Members, California State Board of Optometry (CSBO)
<b>FROM</b>	Shara Murphy, Executive Officer <i>Prepared By Natalia Leeper, Lead Licensing Analyst and Marc Johnson, Policy Analyst</i>
<b>SUBJECT</b>	Agenda Item #4 - Discussion of Presentation by Office of Professional Examination Services (OPES) and Department of Consumer Affairs Executive Office

**Presentation by Office of Professional Examination Services (OPES) and Department of Consumer Affairs Executive Office**

- a. Overview of NBEO Part III Examination Linkage Study
- b. Pre-COVID Proposed Changes to NBEO Part III Examinations
- c. State-Specific Board Examinations
- d. Actions of other DCA boards in the verification of applicant competency to practice

Attachment: OPES PowerPoint

**Relevant statutes relating to exam requirements**

From the Business and Professions Code:

**[3041.3 \(c\)](#)**

The board shall grant a therapeutic pharmaceutical agents certification to any applicant who graduated from a California accredited school of optometry on or after January 1, 1996, who is licensed as an optometrist in California, and who passes all sections of the National Board of Examiners in Optometry's national board examination or its equivalent, as determined by the State Board of Optometry.

**[3046](#)**

In order to obtain a license to practice optometry in California, an applicant shall have graduated from an accredited school of optometry, passed the required examinations for licensure, not have met any of the grounds for denial established in Section 480, and not be currently required to register as a sex offender pursuant to Section 290 of the Penal Code. The proceedings under this section shall be in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.



## **Relevant regulations relating to exam requirements**

From Title 16 of the California Code of Regulations:

### **1523 (d)**

Each applicant must achieve passing grades in all Board required examinations before being granted a license to practice optometry.

### **1523 (f)**

Licensure shall be contingent on the applicants passing the Clinical Skills portion of the National Board of Examiners in Optometry examination as provided in Section 1531 in this Article and passing the CLRE.

### **1531 (a)**

The licensure examinations are composed of:

Section I - Applied Basic Science written cognitive examination approved by the Board and developed by the National Board of Examiners in Optometry (NBEO).

Section II - Patient Assessment and Management/Treatment and Management of Ocular Disease examination developed by the NBEO.

Section III - Clinical Skills Examination developed by the NBEO.

Section IV - California Laws and Regulations Examination developed and administered by the Board or its contractor.



# OPES Overview of Optometry Examinations

## Required Examinations

### **1. NBEO Part I - Applied Basic Science (ABS)**

- ✓ Assesses basic science concepts necessary for clinical practice
- ✓ 350 computer-based multiple choice items
- ✓ Taken during 3<sup>rd</sup> year of school

### **2. NBEO Part II - Patient Assessment and Management (PAM)**

- ✓ Patient cases including data and photos
- ✓ Mini-cases including scenarios and images
- ✓ Solo multiple choice items
- ✓ 350 computer-based multiple choice items; 100-150 ocular disease items
- ✓ Taken during 4<sup>th</sup> year of school

# OPES Overview of Optometry Examinations

## Required Examinations (cont.)

### **3. NBEO Part III - Clinical Skills Exam (CSE)**

- ✓ Practical examination to test communication and clinical optometric exam skills
- ✓ Assesses 19 clinical skills across four stations during a 3.75-hour session
- ✓ Offered only in North Carolina
- ✓ Taken during 4th year of school

### **4. California Optometry Laws and Regulations Examination**

- ✓ Assesses scope of practice; recordkeeping and reporting; advertising and referrals; and prescribing
- ✓ 50 computer-based multiple choice items

# DCA Program Responses to COVID-19

## Summary of Policy and Legal Mandates

- ✓ Business and Professions Code § 139
- ✓ California Code of Regulations § 1531

## Other Board Responses to COVID-19

- ✓ License renewal extensions
- ✓ Alternative examination formats

## Examples of DCA Waivers

- ✓ Face to face supervision and therapy
- ✓ Continuing education
- ✓ [https://www.dca.ca.gov/licensees/dca\\_waivers.shtml](https://www.dca.ca.gov/licensees/dca_waivers.shtml)



# ISSUE MEMORANDUM

<b>DATE</b>	September 18, 2020
<b>TO</b>	Members, California State Board of Optometry (CSBO)
<b>FROM</b>	Shara Murphy, Executive Officer
<b>SUBJECT</b>	Agenda Item #5 - Discussion of Presentation by Optometry College/School Deans and California Optometric Association Regarding Need for Accommodations and Impacts to Students

## Presentation by California Optometry Schools

- Dr. John Flanagan, Dean, UC Berkeley School of Optometry
- Dr. Elizabeth Hoppe, Dean, College of Optometry, Western University of Health Sciences
- Dr. Jennifer Coyle, Dean, Southern California College of Optometry, Marshall B. Ketchum University

## Presentation from the California Optometric Association

- Kristine Shultz, Interim Executive Director, California Optometric Association

### Attachments:

1. Letter from California Licensing Coalition
2. DCA form Completed by Coalition for Waiver of NBEO
3. DCA Letter Denying Request for Waiver
4. Student Letters provided by COA



**Marshall B.  
KETCHUM UNIVERSITY**  
Southern California College of Optometry



April 7, 2020

Kimberly Kirchmeyer,  
Director, Department of Consumer Affairs,  
1625 N. Market Blvd. Suite S204,  
Sacramento, CA 95834.

**re: Licensure for Class of 2020 Optometry School Students.**

Dear Ms. Kirchmeyer,

We are writing on behalf of California’s optometry students, to express our grave concerns for the Class of 2020’s 235 graduating doctors of optometry, as a result of the extraordinary COVID-19 pandemic. We represent all three California schools and colleges of Optometry, optometry students, and member doctors of the California Optometric Association. We request the Department of Consumer Affairs issue waivers to enable the California Board of Optometry to provide *temporary licensure* for the 2020 graduates of accredited California schools of optometry, approved by the federal Accreditation Council on Optometric Association (ACOE). *The waivers are requested for 6 months following the end of the emergency, due to closure of the national test center of the National Board of Examiners in Optometry (NBE), the closure of California testing sites for the state jurisprudence examination, and the inability to obtain Live Scan fingerprinting services.*

We are grateful for the strong leadership of our State in response to the COVID-19 crisis, and commend our collective ability to have “flattened the curve”. However, one of the many consequences of the much-needed Shelter in Place policy is that graduating professional health science students, like our optometry students, have no immediate path to licensure. Our graduates possess the knowledge and expertise to immediately contribute to the health care needs of Californians during this difficult time, including the provision of urgent and emergent care, which is vitally important to keep patients with eye problems away from ER and urgent care clinics. Newly licensed doctors of optometry are also crucial to provide essential eye care services to veterans within our VA hospital system.

In addition to the immediate needs for service on the front lines of care, we are anticipating a backlog of patients with pent-up demand for eye care services upon the removal of the state of emergency declaration and the relaxing of stay at home orders. For optometry to meet the

predicted surge, having our graduates licensed and ready to practice will ensure that the residents of the state of California will receive the appropriate health care that they deserve.

As deans of California's three ACOE-accredited optometry schools, located at the University of California at Berkeley, the Southern California College of Optometry at Marshall B. Ketchum University, and Western University of Health Sciences College of Optometry, we are directly responsible for providing some of the highest quality optometrists and primary eye care providers in the country. The students about to graduate have invested deeply in their education, have completed all educational requirements and are ready to enter their profession and serve the unmet visual and eye health care needs of our communities. Unfortunately, they do so at a time that will potentially, without the requested waivers, keep them idle and unable to contribute.

Our confidence in this waiver request is founded on our personal experience of the rigors of optometry program accreditation by the ACOE, in addition to our oversight by the California Board of Optometry, and a commitment to high performance standards. We are fortunate that California's optometry schools consistently attract the best and the brightest throughout the country and consistently produce the best and brightest professionals. We are confident these new primary eye care providers will contribute to their communities in important ways and, along with the students themselves and the California Optometric Association, we urge the Department of Consumer Affairs to act now to grant the requested waivers.

As representatives of California's optometry schools, we believe that the extraordinary circumstances of the COVID-19 pandemic require extraordinary and creative solutions. We are in strong support of finding a solution that does not compromise patient safety, and at the same time ensures timely licensure for the Class of 2020. It is imperative that students both graduate and receive licensure in a timely manner in order to enter the workforce, matriculate into advanced education residency programs and begin to serve their communities. We were pleased to hear Governor Newsom express similar concerns and his support for health care licensure flexibility in his March 30 Executive Order 39-20. We look forward to the California Board of Optometry, the Department of Consumer Affairs and the optometry community working together to ensure that this year's optometry school program graduates overcome the challenges presented during this national crisis, maintain the profession of optometry's standard of excellence, uphold the Department's commitment to patient safety, and secure optometry licenses without interruption.

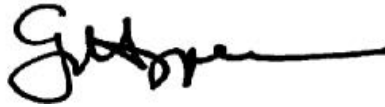
It is for these reasons our three organizations urge the Department of Consumer Affairs to *grant the requested waivers so that the State Board of Optometry can issue licensure to the 2020 graduates of ACOE-accredited California optometry programs*. It is essential to get these talented and highly educated healthcare professionals licensed and able to practice, both for their ability to assist with the COVID-19 emergency efforts and to ensure they are able to address the backlog of eye care needs and begin paying back what are, for many, enormous student loans.

It is important, now more than ever, that California health care professional licensure proceed without interruption and these energetic and qualified eye care providers join the health care workforce in this time of so much need.

Sincerely,



John G. Flanagan PhD, FCOptom.  
Dean and Professor,  
School of Optometry,  
University of California Berkeley.



Elizabeth Hoppe OD, MPH, DrPH.  
Founding Dean,  
College of Optometry,  
Western University of Health Sciences.



Jennifer Coyle OD, MS.  
Dean, Southern California  
College of Optometry,  
Marshall B. Ketchum University.



Jason Tu, OD.  
President,  
California Optometric Association.

Alexander Bennett,  
President-Elect,  
American Optometric Student Association.

cc: Executive Officer, California Board of Optometry  
President, California Board of Optometry





# DEPARTMENT OF CONSUMER AFFAIRS WAIVER REQUEST FORM

**Executive Order N-39-20** authorized the Director of the Department of Consumer Affairs to waive any of the professional licensing requirements that govern healthcare professionals in Division 2 of the Business and Professions Code, and the associated regulations. Any waiver may include alternative measures that, under the circumstances, will allow the regulated individual to treat patients while protecting public health and safety.

**NAME (FIRST/LAST):** University of California Office of the President (UC Health)

**LICENSING ENTITY:** Optometry, Board of

**BUSINESS AND PROFESSIONS CODE/REGULATIONS REQUESTED TO BE WAIVED:**

**1. BUSINESS AND PROFESSIONS CODE:**

BPC; Division 2. Healing Arts [500 - 4999.129]; Chapter 7. Optometry [3000 - 3167]; Article 3. Admission to Practice [3040 - 3060] and

2. 16 CCR § 1523. Licensure and Examination Requirements.

**STATEMENT OF NEED:**

Clinical examinations required for CA licensure have been canceled and the single national test center closed. Law examinations have also been canceled and State test centers closed. To ensure that the 235 graduating optometry students have a pathway to temporary licensure enabling them to serve their communities' health care needs. We request a temporary waiver of clinical examination, jurisprudence examination, and finger-printing requirements for students graduating from an accredited California optometry program in 2020.

**AUTHORIZED CONTACT PERSON:**

**PHONE:** 510 495 9693

**EMAIL:** jgflanagan@berkeley.edu

**FOR OFFICIAL USE ONLY**

**WAIVER REQUEST #:**

APPROVED

DENIED

DCA DIRECTOR SIGNATURE



# DEPARTMENT OF CONSUMER AFFAIRS WAIVER REQUEST FORM

## FOR OFFICIAL USE ONLY

WAIVER REQUEST #:

BACKGROUND:

DCA RECOMMENDATION:

BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY COMMENTS:

APPROVED

DENIED

BCSH SECRETARY SIGNATURE



**Executive Office**

1625 North Market Blvd., Suite S-308, Sacramento, CA 95834  
P (916) 574-8200 F (916) 574-8613 | [www.dca.ca.gov](http://www.dca.ca.gov)



April 21, 2020

John G. Flanagan PhD, FCOptom.  
Dean and Professor  
School of Optometry  
University of California Berkeley  
[jgflanagan@berkeley.edu](mailto:jgflanagan@berkeley.edu)

Dear Dr. Flanagan:

Thank you for your waiver request submitted to the Department of Consumer Affairs (Department). The University of California Office of the President (UC Health) has requested that the Department waive Business & Professions Code Sections 3040 – 3060 and California Code of Regulations, Title 16, Section 1523 related to requirements for the clinical examination, the jurisprudence examination, and finger-printing requirements for students graduating from an accredited California optometry program in 2020.

As stated in Executive Order N-39-20, the Director of the Department is authorized to waive laws and regulations pertaining to professional licensing requirements. The Department must balance consumer protection with the need to facilitate the continued provision of care to individuals affected by the COVID-19 outbreak, as stated in the Executive Order. All waiver request statements of need are reviewed under this criteria.

The Department has reviewed your waiver request and it is not being approved at this time. The Department may reconsider this waiver request, in the event the need should increase in the future.

If you have any questions or need further information, please contact me, or my Deputy Director of Legislative Affairs, Jennifer Simoes, at (916) 574-8200.

Sincerely,

A handwritten signature in blue ink that reads "Kimberly Kirchmeyer".

Kimberly Kirchmeyer  
Director

cc: Shara Perkins Murphy, Executive Officer, California Board of Optometry

To whom it may concern,

My name is Yeraz Kochkarian and I am the vice president of Western University College of Optometry's class of 2021. On March 16<sup>th</sup> at 7:00 PM, less than fifteen hours prior to my scheduled exam, we were informed that Pearson VUE had made the decision to shut down all test centers as a result of the pandemic. Prior to this notice, several optometry students nation-wide including myself had attempted to contact NBEO for an official decision, but were met with an answering machine. After having prepared for this exam for six months, one could only imagine our shock and frustration.

Though I understand that the state of the pandemic and the decision to reopen Pearson VUE was out of NBEO's hands, the ability to pull the exam in a timely manner and communicate openly with students in the months following could have been handled more appropriately. The additional stress in conjunction with the pandemic and unconfirmed rotations has made it increasingly more difficult to prepare for this exam with a clear mind. Not to mention the additive cost of potentially traveling out of state due to the lack of available seats with no monetary compensation. Considering the amount of time, money, and anxiety expended on the behalf of students in preparation, I hope our frustration with how the situation was handled is understandable.

It is for this reason that I am in support of the proposition to allow colleges to determine the competency of students on a temporary basis in a standardized manner should a situation like this arise. Our schools are staffed with the highest quality educators and faculty who would work closely with NBEO to maintain the integrity of the profession, all the while handling the situation based on their state's respective guidelines. These are unprecedented times for all of us and we have been as flexible as possible to accommodate the requirements set forth by NBEO. As the organization tasked with determining the eligibility of future optometrists, I hope you see the practicality in this approach. The current infrastructure jeopardizes our ability to be licensed in a timely manner, further impacting our employment prospects in an already volatile market. We are passionate about our profession and only want the best for generations to come. We hope our concerns are heard and appropriate measures are taken moving forward to avoid this situation in the future. Thank you for your time and consideration.

Best regards,

A handwritten signature in black ink, appearing to be 'Yeraz Kochkarian', with a stylized flourish extending to the right.

Yeraz Kochkarian  
OD SGA 2021, Vice President

I am writing to you today to please consider an alternative avenue for licensure. As a future practitioner in the state of California, I am both excited and quite nervous to begin working alongside you given the current state that we are in.

I am excited to work side by side with you in order to continue to provide the highest level of patient care to the patients that walk into our clinics, hospitals, and community health centers. I am excited to provide to the communities that I grew up in and to all who sit in my exam chair.

However, given the pandemic that we are in, I know that realistically, this could be quite a while after I graduate. It is no secret, that the state licenses at this moment are behind schedule. I agree that given the circumstances of COVID, the state is doing everything in its power to push licensures out as quick as possible.

It scares me knowing current 2020 graduates who still are unable to practice because they have yet to receive their licenses. This is what makes me nervous. This is what worries me. If this is the case, how will this trickle down to affect myself and my fellow graduates of 2021.

I am sure that as a board and its members, you have all collectively approached the financial impact that this could cause, given a delay in licensing the next generation. I want to emphasize that although it may seem like a month or 2 may be no big deal, for quite a few of us, a month or two is everything.

Questions like how will we pay for housing? How will we pay for food? Do we need to move to another state in hopes of getting a job and licensure quicker so that we can make ends meet? Is it worth the move? These are the questions that we must consider in hopes of providing for the next generation of optometrists.

As a 4th year, I have seen the struggles of using a 3rd party (PearsonVue) testing center. I was scheduled to take boards March 17th, 2020, however at 5 pm the night before, I received an email canceling my exam. What a heartbreak it was! I recently took boards on July 27th, 2020, and I will bet to say that the room I took it in was no different than what I would have been in on March 17th. All the protocols in place are the same as they were 4 months ago and nothing at all has changed.

I agree, that it is a fantastic place to administer a test due to the sophistication of their protocols and systems. However, I believe that each one of our optometry

schools has the same capability. As a student we would take tests using ExamSoft which theoretically, is a simpler version of the software used by PearsonVue. If we could use this for 3 years, why not explore the option for all required testing during this unique time that we are in.

I believe that if we hold the schools responsible for our education, we should be able to hold them responsible for being able to properly administer these examinations. I believe back when the tests were on paper, they too were held on campus.

All in all, I would like to formally thank you for your time. I know that this situation continues to change daily, and I appreciate the time and effort you all put in to ensure that we are ahead of the game. I wish you all well during this time. Stay safe and six feet apart. That is the end of Matthew Chiu's statement.

In closing, I want to share with you something that Dr. Kevan Alexander wrote to the NBEO - We are at **war** with the pandemic. In a war, the usual standards and rules cannot apply because they are impractical. We should be able to find a solution that will ensure student safety and protection of the public.

Thank you for your time.

Matthew Chiu, a current 4th year student from Western University.

To the California state board of optometry,

Thank you for taking the time to hear my appeal. As a student affected by COVID-19, 2020 has certainly been a difficult year. We at the American Optometric Student Association (AOSA) have been trying to work with the NBEO to ensure contingency plans for all optometry students completing their Part 1, 2 and 3 exams, in the safest manner possible. Unfortunately, NBEO has been inflexible in their required travel to Charlotte, North Carolina for the Part 3 skills exam. Some will be traveling from hot-spot states to Charlotte, where they may be exposed, or unknowingly expose others, to the novel corona virus. Furthermore, the students will then be returning to their respective colleges of Optometry, or their externship clinics, potentially exposing staff, faculty, patients, and other students.

I am appealing to the California State Board of Optometry to grant the California colleges of Optometry the temporary right to determine student competency in their clinical skills, at least until the NBEO can resume normal operations. With potential rescheduling of students who must travel to Charlotte, should states shut down again, delays could result in scores being released in time to apply to residency programs, or affect students graduating on time. Delays in scheduling after the shutdown in March has already prevented some new grads from receiving their license in a timely manner, leaving them indebted *and* unable to seek employment in this difficult time.

Another reason for the appeal has to do with the difficulty of traveling during the COVID-19 pandemic. Asking students to leave extern sites for the Part 3 exam could result in students requiring self-quarantine for up to 14 days upon their return, depending on where they are returning to. There is also the fear of traveling amidst the outbreak, and students are understandably worried for their health; myself included. These concerns are not solely based around travel to North Carolina, but for students who are traveling to distant Pearson Vue testing centers to take NBEO Parts 1 and 2 exams, due to a lack of space. This has been an ongoing problem in some areas since lockdowns began in March 2020, and has displaced a great number of students already.

I understand that this situation is difficult for everyone, and extremely frustrating. There are no easy answers to this problem we are all facing. Other state licensing boards allow their respective colleges of optometry to certify student's



competency through receipt of their diploma, and this would ensure that the public has access to highly trained and skilled graduates of Optometry at an unprecedented time. Just like other states have already done, I am asking the California state board of Optometry to consider a temporary measure to grant colleges of Optometry in California the ability to determine competency in students' clinical skills in order to become licensed and serve the citizens of the great state of California.

Very respectfully,

Alex Bennett

Doctor of Optometry Candidate 2021

Western University of Health Sciences

AOSA President

I had prepared to take the NBEO Part 1 Board exam the week of March 16th 2020, when suddenly like a sledgehammer the NBEO made the decision to cancel all their Pearson VUE exams nationwide. Many states had been enduring the start of COVID-19 impacting their population, with the northeast infested so severely a colleague from SUNY's College of Optometry flew down to take the test in Florida, also to only find out there would be no test taking anywhere. The California San Francisco Bay area where I live had already begun its shelter in place mandate days earlier, so it seemed obvious with situations like these, NBEO would have to cancel the exam. Yet they waited until the very last minute essentially, with 12 hours to go before the first test takers were to begin, for NBEO to make their final announcement.

This test is so rigorous, known to be the toughest actually of all 3 NBEO Board exams required--with the highest fail rates nationwide more than the Part 2 or Part 3. It has been absolutely stressful enough studying for it over the previous 6+ months only to have the peak of maximum knowledge absorption wasted. It is like telling someone to hold their breath as long as they can, then telling them it was for nothing. Now we had to be told after studying as long and as hard as we could, that the time hadn't actually come yet and we needed to keep holding our breaths. You can imagine how blue in the face holding your breath that long makes someone. This insane amount of tedious knowledge that no practicing optometrist could possibly retain to that detailed level forever, just as no medical doctor could retain that much detail of their tedious board examination materials forever, was no begging to be tested yet we had to drag it on. Drag it on, which at the time was without an end. NBEO did not handle the timing of their announcement appropriately, and they certainly did not announce regular updates as to future expectations or timelines appropriately. I, along with most colleagues I knew, could not keep studying around the clock to retain all of the prep material. Especially with the pandemic itself, and school getting shut down, then moved to remote virtual learning, there was a lot going on. I ended up breaking my lease with permission from the university so I hurriedly packed up and moved my entire two bedroom apartment; mostly into storage, and partially back home, not an easy feat.

The end of the semester came and went, with no NBEO updates, and so summer rotations began. I had to pick up and move again, to attend my summer externship in Oklahoma starting the end of May. I dragged all my study materials with me and started perusing them again with a feeling that NBEO had to have something up their sleeves pretty soon. Thank goodness I did, because with very limited warning when we all finally did hear from them, it was not the 3 months notice we reasonably expected--it was mere weeks! NBEO essentially said okay so we're opening a three week window for you all to take the test nationwide, oh and it starts in about a month. Painful, needless to say we had to study hard and fast. And after all the exhaustion, I guarantee you 99% of test takers never were able to get back to where they were with knowledge retention preparing for the test. Again with the breathing example, after holding your breath for so incredibly long, being told to exhale--naturally panting--then told to rehold your breath as long as possible again is tremendously hard and actually painful.

If the short notice wasn't enough, NBEO's own website was full of glitches. Both the original time registering for the test in the first place the year before (when it charged me and several other colleagues late fees when we signed up the hour it was opened--then had to fight for refunds), and this reregistration process. Their partnership with Pearson has been an incompetent embarrassment. They couldn't even manage to send out information advising the correct timezone. Now mid-summer told to reregister and pick a new date, folks on the east coast stayed up until midnight to register only to find out they couldn't. Many went to bed assuming NBEO had given the wrong date, though the next morning they learned that NBEO meant CST not EST; that is equally limiting with respect to first come first serve registration. Talk about exhausting and unnecessary stress, again. Then if that still wasn't bad enough, they did not have enough seats planned out nationwide to accommodate all the test takers in this time period and forced many others to have to book out into the November session they had created.

Personally, for my 3 classmates and I who lived in Tulsa, and made the daily almost hour long commute to Muskogee, OK, for our externship but shared one car, it was extremely difficult to find a day where all four of us could take the test together. NBEO, have a heart! Put yourself in our position, you're a fourth year, you're already paying so much extra tuition when you are not even at your school, in many cases paying double rent because you have to keep moving around so much for clinical rotations, and fairly alone with limited resources. Now you're going to add the extra stressor of not being able to even merely see how many seats are available on a certain day for folks to book things together when they share one car?! If all the airlines can manage to make their "open seats" maps available, why can Pearson and NBEO not manage to pull that together.

Needless to say, it was not an ideal situation, but the four of us managed to figure something out. Our poor colleagues though, both from our school and others, who were still struggling to even find ONE open seat at a testing site in their own state--not county, not city, not region, their STATE. Several classmates now had to book flights and hotels to travel to other states to take boards part 1. Side bar, as if only having one testing site for part 3 (in North Carolina only) wasn't bad enough for making poor students travel and spend money they don't have, now students were forced to travel far for part 1 as well. By the time NBEO/Pearson finally figured some improvements out to open up some more seats, either there still were not enough open seats or hotels/airlines were being difficult about travel refunds, so still some students had to travel to enormous lengths to take the test. How much of a financial and again mental sting do you think that takes? Mental toll after emotional tax, one strain after another, taking the NBEO part 1 exam has been a pain... not to mention the unnecessary COVID-19 exposure for those who still had to travel to take the test.

The whole complicated method of how NBEO would even traditionally grade the exam, usually basing it only on the people who took it the same single day as you nationwide, is now convoluted. The exam used to be spread over 4 days. That was only four calculations they had to make to figure out their average or standard deviations etc. Now the exam is spread over 3 WEEKS, no idea how they are going to make the grading fair. All this struggle for optometry, whereas medicine's answer was to just fast track their graduates and get more doctors in the field ASAP. It's very disheartening. **Although COVID-19 was not avoidable, and the cancellation/postponement of the test was imminent, the way NBEO [and Pearson] handled it with their lack of communication, insufficient planning, and poor execution was *indeed*--avoidable.**

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**Kindest Regards,**  
**Mahsa Katherine Masoudi**  
Doctor of Optometry Candidate, Class of 2021  
[University of California, Berkeley](#)  
Class Sunshine Chair  
[COA](#) Student Delegate  
[Gold Key](#) Honor Society President  
AOA [Contact Lens & Cornea Section](#) National Liaison  
AOA [Education Center Committee](#) National Liaison

Here is my story and I hope it can be heard.

Ten years ago I immigrated to the US for a better life and education. I left behind all I had in my country including my family in order to achieve best education and become an Optometrist. I have worked so hard in the past ten years to be here where I am today. I have been married for ten years but I and my husband decided to wait for having a child so I can become more focused on my education. Since it was my last year of school we decided to grow our family a little bigger. I am currently pregnant and in my 3rd trimester with my first child. Even though my plans changed due to the pandemic, I never let difficult situations take me away from my goals. In addition to all of the stress and uncontrolled situations, I managed to keep up with my rotations and study for part1 while I was also really sick because of my pregnancy. I was hoping to finish with all my board examinations before my delivery but unfortunately the travel to NC for part 3 has become a barrier for me. Traveling 5 hours long during pandemic while pregnant is something that puts me and my child's health at a very high risk and I do not want to take that risk. Unfortunately, I had schedule the exam for after delivery. Even at that time, leaving an infant for three days and traveling a long distance in a pandemic does not sound safe and appropriate. I have always worked so hard and never let anything to push me back, but this time I feel like no matter how hard I work, it is still extremely stressful. I really wish there was an option to take part 3 exam without traveling and being at risk and stressed out. I am sure all students will be extremely appreciative of any accommodative decision of the **NBEO** regarding part 3 examination in this unusual year.

Best Regards,

Maryam Mirzaei

Hello there,

I am a fourth-year optometry student at SCCO, writing to share my story about NBEO part III test accessibility. I wanted to add my voice in saying that it would be a huge relief for many students if a new site were ever available.

It's uncomfortable to share this information, but I have panic disorder and a fear of flying in planes. I have planned a road trip from southern California to Charlotte, NC, and then back just to take part III. This includes 7 different hotel stays. This is expensive and makes my Covid-19 exposure risk many times greater. Because of my panic disorder, my mother is driving with me, which increases her Covid-19 exposure risk too.

I know that the Charlotte testing site is designed with fairness of evaluation and the public interest in mind. But I wish that a new site could be considered, whether now or in the future.

In any case thank you for the consideration.

Sincerely,  
Travis Bals  
SCCO Class of 2021



## ISSUE MEMORANDUM

<b>DATE</b>	September 18, 2020
<b>TO</b>	Members, California State Board of Optometry (CSBO)
<b>FROM</b>	Shara Murphy, Executive Officer
<b>SUBJECT</b>	Agenda Item #6 - Discussion of Alternatives to the NBEO Exam for 2021 Graduates/Licensure Applicants



## ISSUE MEMORANDUM

<b>DATE</b>	September 18, 2020
<b>TO</b>	Members, California State Board of Optometry (CSBO)
<b>FROM</b>	Shara Murphy, Executive Officer
<b>SUBJECT</b>	Agenda Item #7 - Discussion of Consumer, Applicant, and Employment Impacts and Possible Action to Adopt a Plan for Alternate Competency Verification





## ISSUE MEMORANDUM

<b>DATE</b>	September 18, 2020
<b>TO</b>	Members, California State Board of Optometry (CSBO)
<b>FROM</b>	Mark Morodomi, President
<b>SUBJECT</b>	Agenda Item #8 - Adjournment

If adjournment is made, please note the time for the record and announce any future public Board meetings:

- October 23, 2020 Board Meeting – online via WebEx