

TEXAS OPTOMETRY BOARD

George H.W. Bush State Office Building
1801 Congress Avenue, Suite 9.300
Austin, Texas 78701

August 13, 2025

Beth Robinson, OD
President
Texas Optometric Association
3011 N. Lamar Blvd., Suite 300
Austin, Texas 78795

Dear Dr. Robinson:

Since Dr. Kumar Patel's of February 14, 2025, and at the Texas Optometric Association's request, the Texas Optometry Board (Board) has spent the last six months studying the operations of the National Board of Examiners in Optometry (NBEO). We were specifically gathering information on the NBEO including its governance structure, how it is financed, and examination processes.

In terms of its examination processes, Board members Dr. Cary Patrick and myself have served on the National Board Examination Review Committee of the Association of Regulatory Boards in Optometry (ARBO) for several years. That service allowed us to take a deep dive into NBEO operations. As a state licensing agency that relies on the NBEO to determine if optometry students are competent to be licensed, we believe NBEO is doing a good job with their testing and exam structure. The new Part III exam does a significantly better job testing a candidate's thinking and analyzing skills at the level of a competent doctor in clinical situations.

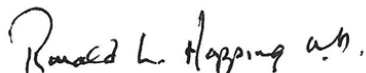
In terms of the financial structure, NBEO's distribution of income and expenses seems reasonable. From publically available records, it appears they have much less of a reserve than what is commonly shared among the optometric community. While NBEO spent quite a bit of money to move the testing operation, that move should be a benefit to students with more testing bays and better equipment.

The incorrect release of the Part II scores was a mistake which NBEO recognizes. After personally talking to NBEO leadership for several hours on separate occasions, I do not believe that type of error will happen again.

NBEO recognizing its public relations problems is a positive outcome of this error. Certainly NBEO has been much more transparent of late. We will continue to work with NBEO and ARBO leadership to ensure NBEO is transparent and accountable for its operations, policies and testing practices.

Thank you for your service to the optometric community.

Sincerely,



Ron Hopping, OD, DOS, MPH, FAAO
Chair, Texas Optometry Board



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April 1, 2025

Ron Hopping, OD, DOS, MPH, FAAO
Chairman, Texas Optometry Board
1801 Congress Ave. Suite 9.300
Austin, TX 78701-1319

Dear Dr. Hopping:

I am writing on behalf of the Board of Directors of The Association of Regulatory Boards of Optometry (ARBO) in response to the letter sent by the Texas Optometric Association (TOA) on February 14, 2025, asking for the Texas Board of Optometry and ARBO to conduct a thorough, independent investigation of the National Board of Examiners in Optometry (NBEO). I would like to make you aware that even though ARBO is shown as being copied on the letter from TOA, we were not sent a copy of the letter. I was informed of the letter by the NBEO Executive Director who forwarded a copy to me. I reached out to Dr. Kumar Patel, President of the TOA to ask if he had intended to send a copy of the letter to ARBO and he responded that he had.

ARBO was made aware of the reporting error of the Part II Exam scores by the NBEO on Friday, January 24, 2025, the day the error occurred. ARBO distributed a statement from NBEO about the incident to our Member Boards on Monday, January 27, 2025. ARBO leadership also met with NBEO leadership about the details of the incident. The ARBO Board of Directors sent a statement to our member Boards on Tuesday, January 28, 2025, noting the significance of the situation and the complexities involved in the development, administration, scoring and maintenance of a valid, legally defensible examination. In the statement, ARBO reported that candidates adversely affected by the circumstance would be able to retest at no charge and provided with complimentary access to NBEO's practice item databank. ARBO also stated that the NBEO has been working on IT upgrades which will ensure that this type of error does not occur again. The ARBO Board of Directors expressed their confidence that the NBEO examination program remains a valid and defensible tool that can be trusted by our Member Boards when making licensure eligibility decisions.

ARBO and NBEO have remained in close communication over the past few weeks about this issue. NBEO has stated that they are committed to increasing communication and engagement with candidates and stakeholders. One way they have done that was with the webinar held for ARBO's members on March 5, 2025, regarding the Part II score reporting error. NBEO has also communicated with students impacted by the reporting error, members of ARBO's National Board Examination Review Committee (NBERC), AOSA, ASCO, AOA and NOA. We feel that NBEO has made every effort to be transparent about the situation that occurred and how they are addressing it.

I understand that the Texas Board of Optometry members were also invited by NBEO to visit the National Center of Clinical Testing in Optometry in Charlotte, North Carolina, and that you are unable to attend due to budgetary issues. If ARBO can assist in setting up a virtual meeting between the Texas Board of Optometry and NBEO to discuss the score reporting issue, please let me know. I also encourage members of the Texas Board of Optometry

to attend ARBO's annual meeting in Minneapolis, June 22-24th. Members of the NBEO staff and Board of Directors will be in attendance at the meeting and will be able to answer any additional questions you may have about the score reporting issue, or NBEO's exam development and administration processes.

Please let me know if you, or your Board members have any questions or need additional information from ARBO.

Best Regards,

A handwritten signature in black ink, reading "Lisa Fennell". The script is cursive and fluid, with the first name "Lisa" and last name "Fennell" clearly distinguishable.

Lisa Fennell
ARBO Executive Director/CEO

cc: Texas Optometric Association
National Board of Examiners in Optometry



March 10, 2025

Ron Hopping, OD, DOS, MPH, FAAO
Chairman, Texas Optometry Board
1801 Congress Ave. Suite 9.300
Austin, TX 78701-1319

Re: Invitation to Texas Optometry Board to visit NBEO/NCCTO

Dear Dr. Hopping,

On behalf of the National Board of Examiners in Optometry (NBEO®), I would like to extend an invitation to the Texas Optometry Board to visit NBEO and tour the National Center of Clinical Testing in Optometry (NCCTO®). We would be honored to host you for a day of engagement with our staff and board members. Visiting the NBEO and NCCTO will provide the Texas Optometry Board valuable information about our mission of public protection as well as insight into our examination processes.

Please let us know your availability, and we will be happy to coordinate a date and agenda that best suits your schedule.

We look forward to welcoming you in Charlotte. Please feel free to reach out with any questions.

Sincerely,

Jill Bryant, OD, MPH, FAAO, FSLs, FASOS
Executive Director



February 24, 2025

Ron Hopping, OD, DOS, MPH, FAAO
Chairman, Texas Optometry Board
1801 Congress Ave. Suite 9.300
Austin, TX 78701-1319

Re: Response and corrections to the February 14, 2025, letter from the Texas Optometric Association

Dear Dr. Hopping,

The National Board of Examiners in Optometry (NBEO) has received a copy of a recent letter you received from the Texas Optometric Association (TOA). We were surprised and disappointed by the tone and contents of the letter. Had the TOA raised such concerns with us directly, much of the confusion and misinformation in this letter could have been addressed. As you will see below, NBEO has gone to great lengths to communicate with the optometric community and remains committed to ensuring that all candidates receive a fair and appropriately rigorous assessment of their readiness to enter the optometric profession.

On Friday, January 24, results for the 1,866 candidates who took the December 2024 Part II PAM/TMOD examinations were released. Unfortunately, a data transfer error caused candidates to be presented with scores that did not reflect their true results. We are fully confident in the accuracy of exam scoring of the December 2024 Part II PAM/TMOD exam (and all previous NBEO exams). The error was a publishing issue, not an issue with the scoring of the exam. This situation was identified and resolved in approximately two hours. Roughly 10% of candidates were temporarily presented with a passing score that they did not earn. This issue did not impact the pass/fail status for approximately 90% of the candidates.

We sincerely regret the confusion and frustration caused by this reporting error. NBEO was already in the process of a multi-year IT update and modernization process that will improve the candidate experience in numerous ways. It will also significantly reduce the likelihood that a data transfer error could ever occur again.

All of us at NBEO recognize the effort, time, and passion candidates commit to when preparing for this exam. We understand this error is particularly frustrating for those

candidates who were incorrectly told they received a passing grade. Despite the TOA's suggestion to the contrary, NBEO quickly, earnestly, and transparently communicated with all candidates, especially those impacted by this issue. NBEO reached out directly to those candidates to provide a retake opportunity at no additional cost, along with free access to the NBEO Practice Items Databank through the next Part II PAM/TMOD administration. Nearly every impacted candidate has since registered for their free retake.

NBEO took similarly robust action to engage the broader optometric community. NBEO sent an email explaining this issue to all candidates, key stakeholder organizations and posted information to our website. Impacted students also received emails explaining the issue and next steps. We have gone to great lengths to transparently inform and educate optometric stakeholders. In the first week following this incident, NBEO spoke directly with the leadership of ARBO, ASCO, AOSA, AOA, NOA, NBERC (a committee within ARBO), and a state optometry board. Those efforts continued in the weeks that followed with conversations with the leadership of multiple regulatory boards. Additionally, along with ARBO, we are providing an informational webinar for regulatory board members on March 5th. We sincerely hope that you and your board will attend.

NBEO will continue to educate stakeholders about its scoring process and IT modernization efforts in the days and weeks to come. We welcome the opportunity to speak with the leadership of the Texas Optometry Board to address any concerns and answer questions. Furthermore, if you have questions and would like to set up a personal call with NBEO, we would be happy to do so.

Thank you for your service to the Texas Optometry Board. All of us at NBEO respect and appreciate the important role you play in promoting, preserving, and protecting the health, safety and welfare needs of the people of Texas.

Sincerely,

The National Board of Examiners in Optometry

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