

September 8, 2011

Charles J. Cronan IV
(502) 681-0430
(502) 779-8241 FAX
ccronan@stites.com

Connie F. Calvert, Executive Director (*via HAND DELIVERY*)
Kentucky Board of Optometric Examiners
163 West Short Street, Suite 550
Lexington, Kentucky 40507

Jerald F. Combs, O.D., President
Kentucky Board of Optometric Examiners
386 KY Route 122
P.O. Box 848
Martin, Kentucky 41649

Optometric Practice Expansion Task Force
c/o Ben Gaddie, O.D.
7635 Shelbyville Road
Louisville, Kentucky 40222

RE: Open Meetings Act Complaint

Dear Ms. Calvert and Drs. Combs and Gaddie:

I write as counsel on behalf of the Kentucky Medical Association and the Kentucky Academy of Eye Physicians and Surgeons regarding 201 KAR 5:110, a proposed regulation implementing Senate Bill 110 which expands optometric therapeutic procedures. The proposed regulation was drafted and recommended by a task force purportedly appointed by Governor Beshear (the "Task Force") and was promulgated by the Kentucky Board of Optometric Examiners ("KBOE"). This letter constitutes a written complaint in accordance with KRS 61.846 and 61.848 regarding apparent failures of the KBOE and the Task Force to comply with the Kentucky Open Meetings Act, KRS 61.805-50 (the "Act") in formulating, recommending, and approving the proposed regulation.

1. The KBOE and the Task Force are "public agencies."

The Act applies to "public agencies," which are defined to include: (1) "Any entity when the majority of its governing body is appointed by a 'public agency' . . . , a member or employee of a 'public agency,' a state or local officer, or any combination thereof" and (2) any body

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“established, created, and controlled” by a public agency. KRS 61.805(2)(f)-(g). The KBOE is a public agency because the Governor of the Commonwealth appoints its members pursuant to KRS 320.230(1).

The KBOE’s June 11, 2011 special meeting minutes list individuals identified as members of a special Task Force. The minutes describe the Task Force as having been “created” by the Governor and charged with proposing a regulation to expand optometric therapeutic procedures.¹ See the attached Exhibit A. Therefore, the Task Force also is a public agency under KRS 61.805(2)(f) and (g). See 11-OMD-060; 06-OMD-068. We have not seen any order appointing the Task Force; however, a formal appointment is not essential to the Task Force’s status as a public agency. See 11-OMD-060 (“KRS 61.805(2)(f) does not require “formal” appointment of agency members Again, any other holding would thwart the intent of the law and invite abuse by agencies intent on circumventing its requirements.”). Both the KBOE and the Task Force “had a critical role in the formation of public policy” and were required to comply with the Act. See 06-OMD-068.

2. The KBOE and the Task Force violated the Act.

The Act requires public agencies to give notice of and hold in the open “[a]ll meetings of a quorum of the members . . . at which any public business is discussed or at which any action is taken” KRS 61.810(1). The Act is to be construed as “ancillary and supplemental” to all other laws regarding meetings. KRS 61.850. The policy behind the Act demands that “the formation of public policy . . . not be conducted in secret.” KRS 61.800.

- (a) Records produced by the KBOE confirm that the Task Force and the KBOE formulated and agreed upon the proposed regulation in secret and without proper notice to the public. An email giving notice to KBOE members of a special KBOE meeting refers to a telephone conference, in which the Task Force members and the KBOE members apparently discussed and concluded there would be agreement on the proposed regulation on June 6, 2011. The email states: “Based upon last night’s Task Force conference call, we assume there will be an agreement and we can move forward with the draft put together by the Task Force.” See the attached Exhibit B.
- (b) Although the Task Force was a public agency, we are unaware of any evidence that the Task Force ever held any open meetings or complied with the Act in any respect.

¹ Although the minutes name members of the Task Force, they do not say the Task Force members were present. Subsequent email correspondence indicates that the names and biographical information on Task Force members were not made available to the KBOE until June 27, 2011, sixteen days after the June 11 meeting. (See Exhibit A.)

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- (c) At 10:43 a.m. on June 10, 2011, the draft regulation was circulated by email to the KBOE members for any comments and their approval. See the attached Exhibit C. Within eleven minutes, Dr. Combs responded by saying “looks good to me.” See the attached Exhibit D. Then, within a span of a little more than two hours, the other KBOE members responded to the email approving the regulation with statements like: “I’m good with it”, “Looks fine to me”, and “ok by me.” See the attached Exhibit E. The next morning, the KBOE met and approved the regulation in an open meeting that lasted only about fifty minutes and in which there was no substantive discussion of or change in the regulation. See the attached Exhibit A.
- (d) The lack of open dialogue by the Task Force and the KBOE in approving the regulation deprived the public of meaningful discussion and deliberation of the proposed regulation and the public policies and interests the regulation is intended to protect. Based on the foregoing, it appears that the Task Force’s and the KBOE’s actions constitute violations of the Act. Specifically:
- (i) The Task Force violated the Act every time it failed to give public notice and/or met privately.
- (ii) The June 6, 2011, telephone conference was an illegal meeting of the Task Force and the KBOE where the public business of the regulation’s content was discussed and a “collective decision” or “committing . . . to make a positive or negative decision” was made regarding the regulation. It makes no difference that the meeting was by conference call. See *Fiscal Court of Jefferson County v. Courier-Journal and Louisville Times Co.*, 554 S.W.2d 72, 73 (Ky. 1977); 11-OMD-018 (“Telephonic meetings of a quorum of the members of a public agency . . . constitute a violation of [the Act] . . .”); see also KRS 61.805(3).
- (iii) On June 10, 2011, the KBOE members illegally affirmed in communications by email their “collective decision” on the proposed regulation thereby rendering the public meeting the following day a sham.

3. The KBOE and the Task Force must withdraw 201 KAR 5:110 to remedy their violations of the Act.

The remedy for the KBOE’s and the Task Force’s violations of the Act is withdrawing the regulation promulgated as a result of their illegal actions. See KRS 61.848(5) (“Any rule, resolution, regulation, ordinance, or other formal action of a public agency without substantial compliance with the requirements of KRS 61.810, 61.815, 61.820, and KRS 61.823 shall be

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voidable by a court of competent jurisdiction.”); *Floyd County Board of Education v. Ratliff*, 955 S.W.2d 921 (Ky. 1997).

In accordance with KRS 61.846, please notify us within three business days whether the Task Force and the KBOE will withdraw the regulation.

Do not hesitate to contact me if you have questions.

Yours very truly,

STITES & HARBISON PLLC



Charles J. Cronan IV

CJC:ytp

Enclosures

cc: Administrative Regulation Review Subcommittee
Attorney General, Commonwealth of Kentucky
Cheryl Lalonde, Esq.

AM188:000AM:848522:2:LOUISVILLE

EXHIBIT A
SEE ATTACHED



KENTUCKY BOARD OF OPTOMETRIC EXAMINERS

Steven L. Beshear
Governor

163 West Short Street, Suite 550
Lexington, Kentucky 40507
Phone: (859) 246-2744
Fax (859) 246-2746
<http://optometry.ky.gov>

**Special Board Meeting
8:00a.m., June 11, 2011
Embassy Suites Hotel
Lexington, KY**

AGENDA

CALL TO ORDER

ROLL CALL

ITEMS TO BE CONSIDERED

Task Force Presentation

ADJOURNMENT



KENTUCKY BOARD OF OPTOMETRIC EXAMINERS

Steven L. Beshear
Governor

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Lexington, Kentucky 40507
Phone: (859) 246-2744
Fax (859) 246-2746
<http://optometry.ky.gov>

SPECIAL MEETING MINUTES

June 11, 2011

Embassy-Suites Hotel
Lexington, Kentucky

President Combs called the meeting to order at 8:10 a.m. At roll call, all members were present.

The Board convened to consider draft language proposed by a Task Force created by Governor Steve Beshear. The members of that group were tasked with proposing regulatory language regarding expanded optometric therapeutic procedures. The members of the Task Force were:

Britt Brockman, MD

KY Licensed Ophthalmologist with John Kenyon American Eye Institute, Louisville, KY; Pharmacist; President, Board of Trustees, University of Kentucky

Les Walls, MD

Optometrist and Family Practice Physician; Former Dean, Northeastern State University College of Optometry; Former Dean, Oklahoma State University School of Medicine

Angelia Thompson, MD

KY Licensed, Fellowship trained Vitreo-Retinal Surgeon; Ophthalmologist, Lexington KY

Richard Castillo, DO

Optometrist and Ophthalmologist; Chief ophthalmologist, Northeastern State University College of Optometry, Tahlequah, OK

Earl Nelson, MD

KY Licensed ophthalmologist; Fellowship trained Oculoplastic Surgeon; Fellowship Trained Glaucoma Specialist; Former Director, LSU Eye Institute, New Orleans, LA

Ben Gaddie, OD

Oklahoma and Kentucky Licensed optometrist; Residency trained in Oklahoma; Fellowship in Glaucoma and Laser Therapy, Oklahoma; President KOA. Chair, Education, American Optometric Association; Vice President, Optometric Glaucoma Society

Cliff Caudill, OD

Kentucky Licensed optometrist; Oklahoma Residency trained optometrist; On staff, University of Kentucky Department of Ophthalmology

John Musick, OD

Kentucky Licensed optometrist; Test writer, National Board of Examiners in Optometry; Fellowship Admittance Committee, American Academy of Optometry

Lance Long, OD

Kentucky Licensed optometrist; Oklahoma Residency training, Tulsa OK; Laser certified in Oklahoma

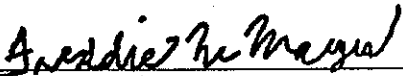
Paul Karpecki, OD

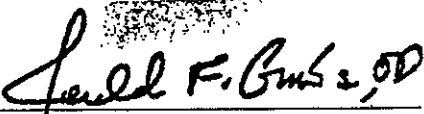
Kentucky Licensed optometrist; Residency and Fellowship trained in Kansas; Leading lecturer and researcher; noted authority in the eye care industry; Practices in an ophthalmology practice in Lexington, KY.

Dr. Mayes suggested that "the" be deleted from line ten on page two.

Dr. Madden moved to approve the draft language of 201 KAR 5:110 with "the" struck from line ten on page two; the public hearing shall be held at the Embassy Suites Hotel on July 21, 2011 at 9 a.m. Dr. Reynolds seconded the motion that passed unanimously.

President Combs adjourned the meeting at 9:00 a.m.


Freddie Mayes, O.D.
Secretary-Treasurer


Jerald F. Combs, O.D.
President

Calvert, Connie (KBOE)

From: Calvert, Connie (KBOE)
Sent: Monday, June 27, 2011 11:45 AM
To: Lalonde, Cheryl (KYOAG)
Subject: FW: Task Force

Cheryl,

Jerald finally sent me the members of the Task Force and the practice expertise is below their names. He said he and Dr. Freddie Mayes were mostly observers. Jerald's email is below.

Connie Calvert, Executive Director

KY Board of Optometric Examiners
163 West Short Street, Suite 550
Lexington, KY 40507
PH: 859-246-2744
FAX: 859-246-2746
E-mail: connie.calvert@ky.gov
Web: <http://optometry.ky.gov>

From: jerald combs [mailto:geraldcombs@hotmail.com]
Sent: Monday, June 27, 2011 11:26 AM
To: Calvert, Connie (KBOE)
Subject: FW: Task Force

here they are.

Jerald F. Combs, O.D. P.O. Box 848 Martin, Kentucky 41649 Phone: (606) 285-3139 Cell: (606) 424-1111
Fax: (606) 285-9110

From: bill.reynolds59@gmail.com
To: carla.blanton@insightbb.com; jeraldcombs@hotmail.com
Subject: Fwd: Task Force
Date: Sat, 25 Jun 2011 16:50:04 -0400

Sent from my iPad

Begin forwarded message:

From: "I. Ben Gaddie" <ibgaddie@bellsouth.net>
Date: June 24, 2011 8:56:25 AM EDT
To: Bill Reynolds <bill.reynolds@mail.com>
Subject: Fwd: Task Force

*Task Force
Members*

Begin forwarded message:

From: "I. Ben Gaddie" <ibgaddie@bellsouth.net>
Date: June 14, 2011 11:50:15 AM EDT
To: darleneekin@kyeyes.org
Subject: Re: Task Force

Will this work?

Ben

Members of the Task Force

Britt Brockman, MD

KY Licensed Ophthalmologist with John Kenyon American Eye Institute, Louisville, KY; Pharmacist; President, Board of Trustees, University of Kentucky

Les Walls, MD

Optometrist and Family Practice Physician; Former Dean, Northeastern State University College of Optometry; Former Dean, Oklahoma State University School of Medicine

Angelia Thompson, MD

KY Licensed, Fellowship trained Vitreo-Retinal Surgeon; Ophthalmologist, Lexington KY

Richard Castillo, DO

Optometrist and Ophthalmologist; Chief ophthalmologist, Northeastern State University College of Optometry, Tahlequah, OK

Earl Nelson, MD

KY Licensed ophthalmologist; Fellowship trained Oculoplastic Surgeon; Fellowship Trained Glaucoma Specialist; Former Director, LSU Eye Institute, New Orleans, LA

Ben Gaddie, OD

Oklahoma and Kentucky Licensed optometrist; Residency trained in Oklahoma; Fellowship in Glaucoma and Laser Therapy, Oklahoma; President KOA. Chair, Education, American Optometric Association; Vice President, Optometric Glaucoma Society

Cliff Caudill, OD

Kentucky Licensed optometrist; Oklahoma Residency trained optometrist; On staff, University of Kentucky Department of Ophthalmology

John Musick, OD

Kentucky Licensed optometrist; Test writer, National Board of Examiners in Optometry; Fellowship Admittance Committee, American Academy of Optometry

Lance Long, OD

Kentucky Licensed optometrist; Oklahoma Residency training, Tulsa OK; Laser certified in Oklahoma

Paul Karpecki, OD

Kentucky Licensed optometrist; Residency and Fellowship trained in Kansas; Leading lecturer and researcher; noted authority in the eye care industry; Practices in an ophthalmology practice in Lexington, KY

EXHIBIT B

SEE ATTACHED

Calvert, Connie (KBOE)

From: Calvert, Connie (KBOE)
Sent: Tuesday, June 07, 2011 10:41 AM
To: 'William Reynolds, O.D. (bill.reynolds@mail.com)'; 'Freddie Mayes'; 'Teresa Madden, O.D. (idocmadden@aol.com)'; 'Mary Lou Brown (maryloubrown@aol.com)'; Lalonde, Cheryl (KYOAG)
Cc: 'Jerald Combs, O.D. (jeraldcombs@hotmail.com)'
Subject: Special Board Meeting

IMPORTANT

There is a 'special' board meeting called for Saturday, June 11, 2011 at 8:00am at the Embassy Suites Hotel on Newtown Pike in Lexington. Based upon last night's Task Force conference call, we assume there will be an agreement and we can move forward with the draft put together by the Task Force.

Because of this short notice and the multiple events this weekend at the Embassy Suites, the meeting will be held in the Sales Office Board Room located next to the Keeneland Board Room where we met on May 13.

If you need a sleeping room Friday night, June 10, call Amy Stamper's direct number at the Embassy Suites at 859-455-5109.

Please, if you are unable to be at this meeting, let me know by Noon on Wednesday, June 8th. There are three board members flying out Saturday for the ARBO conference on Saturday and, therefore, the meeting had to be called early in the day.

Connie Calvert, Executive Director

KY Board of Optometric Examiners
163 West Short Street, Suite 550
Lexington, KY 40507
PH: 859-246-2744
FAX: 859-246-2746
E-mail: connie.calvert@ky.gov
Web: <http://optometry.kv.gov>

Amy same as a sleeping room rate of \$125

EXHIBIT C

SEE ATTACHED

Turner, Mary P (KBOE)

From: Turner, Mary P (KBOE)
Sent: Friday, June 10, 2011 10:43 AM
To: 'jeraldcombs@hotmail.com'; 'bill.reynolds@mail.com'; 'freddiemdrmayes@bellsouth.net'; 'idocmadden@aol.com'; 'maryloubrownn@aol.com'; 'darleneekin@kyeyes.org'
Subject: Regulation 201 KAR 5:110
Attachments: Optom 201 KAR 5-110 6-11.doc

Please review the attached regulation and report back to me before 12 Noon if you have any suggested changes. I will then notify Cheryl Lalonde of your suggestions (if any).

So that I may be sure that everyone has reviewed this regulation, if you have NO suggestions for changes, please drop me a quick e-mail stating no changes.

I will bring the regulation to the 8 a.m. Board Meeting tomorrow.

Mary P. Turner

Administrative Assistant
KY Board of Optometric Examiners
163 West Short Street, Suite 550
Lexington, KY 40507
Office 859-246-2744
Fax 859-246-2746

EXHIBIT D
SEE ATTACHED

Turner, Mary P (KBOE)

From: jerald combs [jeraldcombs@hotmail.com]
Sent: Friday, June 10, 2011 10:54 AM
To: Turner, Mary P (KBOE); Dr. bill Bill Reynolds; freddie freddiemdrmayes; teresa madden; maryloubrownn@aol.com; DARLENE EAKIN
Subject: RE: Regulation 201 KAR 5:110

looks ok to me

Jerald F. Combs, O.D. P.O. Box 848 Martin, Kentucky 41649 Phone: (606) 285-3139 Cell: (606) 424-1111 Fax: (606) 285-9110

Subject: Regulation 201 KAR 5:110
Date: Fri, 10 Jun 2011 10:43:11 -0400
From: MaryP.Turner@ky.gov
To: jeraldcombs@hotmail.com; bill.reynolds@mail.com; freddiemdrmayes@bellsouth.net; idocmadden@aol.com; maryloubrownn@aol.com; darleneeakin@kyeyes.org

Please review the attached regulation and report back to me before 12 Noon if you have any suggested changes. I will then notify Cheryl Lalonde of your suggestions (if any).

So that I may be sure that everyone has reviewed this regulation, if you have NO suggestions for changes, please drop me a quick e-mail stating no changes.

I will bring the regulation to the 8 a.m. Board Meeting tomorrow.

Mary P. Turner
Administrative Assistant
KY Board of Optometric Examiners
163 West Short Street, Suite 550
Lexington, KY 40507
Office 859-246-2744
Fax 859-246-2746

*6-10-11
12:55 PM
phone call
from Mary P. Turner.
"reg is OK w/Dr. Combs -
it's OK w/me."*

EXHIBIT E

SEE ATTACHED

Turner, Mary P (KBOE)

From: Bill Reynolds [bill.reynolds59@gmail.com]
Sent: Friday, June 10, 2011 11:34 AM
To: jerald combs
Cc: Turner, Mary P (KBOE); Dr. bill Bill Reynolds; freddie freddiemdrmayes; teresa madden; <maryloubrownn@aol.com>; DARLENE EAKIN
Subject: Re: Regulation 201 KAR 5:110

I'm good with it

Sent from my iPad

On Jun 10, 2011, at 10:53 AM, jerald combs <jeraldcombs@hotmail.com> wrote:

looks ok to me

Jerald F. Combs, O.D. P.O. Box 848 Martin, Kentucky 41649 Phone: (606) 285-3139 Cell: (606) 424-1111 Fax: (606) 285-9110

Subject: Regulation 201 KAR 5:110
Date: Fri, 10 Jun 2011 10:43:11 -0400
From: MaryP.Turner@ky.gov
To: jeraldcombs@hotmail.com; bill.reynolds@mail.com; freddiemdrmayes@bellsouth.net; idocmadden@aol.com; maryloubrownn@aol.com; darleneeakin@kyeyes.org

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Mary P. Turner

Administrative Assistant

KY Board of Optometric Examiners

163 West Short Street, Suite 550

Lexington, KY 40507

Office 859-246-2744

Fax 859-246-2746

Turner, Mary P (KBOE)

From: FREDDIE M, DR MAYES [freddiemdrmayes@bellsouth.net]
Sent: Friday, June 10, 2011 11:34 AM
To: jeraldcombs@hotmail.com; bill.reynolds@mail.com; idocmadden@aol.com;
maryloubrownn@aol.com; darleneeakin@kyeyes.org; Turner, Mary P (KBOE)
Subject: Re: Regulation 201 KAR 5:110

Looks fine to me.

See you tomorrow,
Freddie

--- On Fri, 6/10/11, Turner, Mary P (KBOE) <MaryP.Turner@ky.gov> wrote:

From: Turner, Mary P (KBOE) <MaryP.Turner@ky.gov>
Subject: Regulation 201 KAR 5:110
To: jeraldcombs@hotmail.com, bill.reynolds@mail.com, freddiemdrmayes@bellsouth.net,
idocmadden@aol.com, maryloubrownn@aol.com, darleneeakin@kyeyes.org
Date: Friday, June 10, 2011, 10:43 AM

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Mary P. Turner

Administrative Assistant

KY Board of Optometric Examiners

163 West Short Street, Suite 550

Lexington, KY 40507

Office 859-246-2744

Turner, Mary P (KBOE)

From: Idocmadden [idocmadden@aol.com]
Sent: Friday, June 10, 2011 11:46 AM
To: freddiemdrmayes@bellsouth.net; jeralcombs@hotmail.com; bill.reynolds@mail.com; maryloubrownn@aol.com; darleneekin@kyeyes.org; Turner, Mary P (KBOE)
Subject: Re: Regulation 201 KAR 5:110

Ok by me.

Teresa Madden, O.D.
Optometrist
American Red Cross Volunteer (You should be too!)

-----Original Message-----

From: FREDDIE M, DR MAYES <freddiemdrmayes@bellsouth.net>
To: jeralcombs <jeralcombs@hotmail.com>; bill.reynolds <bill.reynolds@mail.com>; idocmadden <idocmadden@aol.com>; maryloubrownn <maryloubrownn@aol.com>; darleneekin <darleneekin@kyeyes.org>; Mary P (KBOE)Turner <MaryP.Turner@ky.gov>
Sent: Fri, Jun 10, 2011 11:34 am
Subject: Re: Regulation 201 KAR 5:110

Looks fine to me.

See you tomorrow,
Freddie

--- On Fri, 6/10/11, Turner, Mary P (KBOE) <MaryP.Turner@ky.gov> wrote:

From: Turner, Mary P (KBOE) <MaryP.Turner@ky.gov>
Subject: Regulation 201 KAR 5:110
To: jeralcombs@hotmail.com, bill.reynolds@mail.com, freddiemdrmayes@bellsouth.net, idocmadden@aol.com, maryloubrownn@aol.com, darleneekin@kyeyes.org
Date: Friday, June 10, 2011, 10:43 AM

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Mary P. Turner

Administrative Assistant
KY Board of Optometric Examiners
163 West Short Street, Suite 550

Lexington, KY 40507
Office 859-246-2744
Fax 859-246-2746

Turner, Mary P (KBOE)

From: Idocmadden [idocmadden@aol.com]
Sent: Friday, June 10, 2011 11:48 AM
To: Turner, Mary P (KBOE)
Subject: Re: Regulation 201 KAR 5:110

Ok with me.

Teresa Madden, O.D.
Optometrist
American Red Cross Volunteer (You should be too!)

-----Original Message-----

From: Turner, Mary P (KBOE) (KBOE) <MaryP.Turner@ky.gov>
To: jeraldcombs <jeraldcombs@hotmail.com>; bill.reynolds <bill.reynolds@mail.com>; freddiemdrmayes <freddiemdrmayes@bellsouth.net>; idocmadden <idocmadden@aol.com>; maryloubrownn <maryloubrownn@aol.com>; darleneeakin <darleneeakin@kyeyes.org>
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