



# AMERICAN OPTOMETRIC ASSOCIATION

January 22, 2021

The Honorable Nancy Pelosi  
Speaker of the House  
United States House of Representatives  
H-222, US Capitol  
Washington, DC 20515

The Honorable Charles Schumer  
Senate Majority Leader  
United States Senate  
S-221, US Capitol  
Washington, DC 20510

The Honorable Kevin McCarthy  
House Minority Leader  
United States House of Representatives  
H-204, US Capitol  
Washington, DC 20515

The Honorable Mitch McConnell  
Senate Minority Leader  
United States Senate  
S-230, US Capitol  
Washington, DC 20510

Dear Speaker Pelosi, Leader Schumer, Leader McCarthy, and Leader McConnell:

On behalf of the American Optometric Association (AOA), representing more than 44,000 doctors of optometry, optometric professionals, and optometry students in more than 10,000 communities across the nation, we thank you for your continued efforts aimed at helping the American people through these unprecedented times.

Throughout the pandemic, America's doctors of optometry have been working overtime to ensure that seniors, veterans, children, and working-age men and women have continued access to needed primary, medical, chronic, urgent, and emergent eye health and vision care. Now, with national COVID-19 vaccination efforts ramping up, the nation's doctors of optometry stand ready, willing, and able to help our communities once again. As you prepare additional legislation addressing the public health emergency, we respectfully request that Congress formally recognize doctors of optometry that are not already licensed under state law to administer vaccines to do so in order to help expand the number of qualified professionals able to quickly and safely administer the vaccine.

Doctors of optometry are America's primary care eye doctors. Ninety-nine percent of Americans live in a county with a doctor of optometry.<sup>1</sup> Overall, more than 90 percent of the U.S. Medicare beneficiary population lives within 15 minutes of a doctor of optometry.<sup>2</sup> Doctors of optometry have the necessary knowledge to provide vaccines and all optometry schools and colleges teach injections as part of optometric training. Doctors of optometry in some states are already authorized to provide vaccinations. These states include California, Kentucky, Ohio, and Utah. Other states are currently considering an expansion of vaccination authority to doctors of optometry in response to the current public health

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<sup>1</sup><https://www.aoa.org/AOA/Documents/Advocacy/HPI/County%20Data%20Demonstrates%20Eye%20Care%20Access%20Nationwide.pdf>

<sup>2</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5608548/>

emergency. Additionally, doctors of optometry in 19 states<sup>3</sup> are already authorized to administer injections. In an additional 20 states, doctors of optometry are authorized to provide anaphylaxis through injection. Thousands of doctors of optometry are CPR certified as required by the state law, and many more seek this certification as part of their overall commitment to best serving patients.

As Congress considers new solutions to help speed the rollout of vaccines across the nation, we respectfully request that you note the role that doctors of optometry could play in surging the vaccination workforce based on the important role optometrists have already played throughout this pandemic. The range of key roles and responsibilities of doctors of optometry, as part of the COVID-19 public health response, include diagnosis and treatment of vision and eye health emergencies, ocular and adnexa injuries and disorders. Doctors of optometry also respond to traumatic concussions, remove foreign bodies in the eye, provide biologic and tissue sampling, treat traumas/lacerations, provide general diabetes and hypertensive care and basic primary medical care.<sup>4</sup> The AOA Health Policy Institute data shows that during less than one month early in the pandemic, doctors of optometry provided urgent and emergency care to approximately 206,627 individuals.<sup>5</sup> Doctors of optometry also reported 60 percent of the patients they treated during the early stages of the pandemic would have otherwise sought care at an emergency department or urgent care center had the optometry practice not been providing essential, urgent or emergency care during the surveyed time period. Our doctors have played, and continue to play, a high-risk, front-line role in supporting Americans throughout the current public health emergency and we are ready to continue doing so, including in a vaccine administration capacity.

Congress formally recognizing doctors of optometry to administer COVID-19 vaccines nationwide will greatly expand the number of qualified professionals able to administer the vaccine to those in need and, for patients, would mean ready and safe access to the COVID-19 vaccine for 99 percent of the population, and 90 percent of our country's most vulnerable patients. AOA member doctors stand ready to do even more to help our communities and we look forward to working with you and other leading lawmakers to make this vital vaccine much more accessible. If additional information is needed, please contact AOA Chief Federal Advocacy Officer, Matt Willette, at [mwillette@aoa.org](mailto:mwillette@aoa.org) or 703-837-1001.

Sincerely,



William T. Reynolds, O.D.  
President  
American Optometric Association

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<sup>3</sup> <https://communityforvision.com/ce-requirements-state/>

<sup>4</sup> [https://www.aoa.org/AOA/Documents/Advocacy/HPI/HPI\\_Doctors%20of%20Optometry%20in%20COVID-19%20Preparedness%20Response%20and%20Recovery.pdf](https://www.aoa.org/AOA/Documents/Advocacy/HPI/HPI_Doctors%20of%20Optometry%20in%20COVID-19%20Preparedness%20Response%20and%20Recovery.pdf)

<sup>5</sup> <https://www.aoa.org/AOA/Documents/Advocacy/HPI/Emergency%20Department%20Diversion%20Brief.pdf>