



December 3, 2020

Amanda Cohn, M.D.
Senior Advisor for Vaccines National Center for Immunization and Respiratory Diseases
Centers for Disease Control and Prevention
1600 Clifton Rd.
Atlanta, GA 30329-4027

Dear Dr. Cohn,

Representing tens of thousands of frontline doctors of optometry in states across the country, the American Optometric Association (AOA) and state optometry associations greatly appreciate the important work of the Centers for Disease Control and Prevention (CDC) Advisory Committee on Immunization Practices (ACIP). The committee's recommendation will be critical for state health departments to consider as they work to develop prioritization plans and place orders for the COVID-19 vaccine as initial doses of the vaccine are made available. Throughout the pandemic our doctors have been providing eye health and vision care to patients across our country. With the COVID-19 vaccination potentially being administered as early as this year, the committee's recommendations are of critical importance to state public health officials as they continue the challenging work of developing plans to administer newly released vaccines.

Vaccination Priority for Health Care Personnel

Our doctors and their staff members are proud to serve America's eye health needs as part of the 21 million health care personnel workforce across the country. The AOA appreciates that the committee has recognized the need to ensure all "health care personnel" are prioritized in the initial phase of the COVID-19 vaccination program (Phase 1a). We fully support the committee's broad definition of health care personnel and agree that both paid and unpaid persons serving in health care settings who have the potential for direct or indirect exposure to patients or infectious material must be prioritized to receive the vaccination. We also appreciate that the committee has recognized that health care personnel work in many settings. Doctors of optometry most frequently care for patients in physician offices or "outpatient clinics" as the committee has referred to these health care settings.

Doctors of optometry are the primary care doctors of the eye and visual system who practice in settings which are very accessible to at risk populations. AOA Health Policy Institute (HPI) data describe that early in the pandemic, in less than one month, doctors of optometry provided urgent and emergency care to approximately 206,627 individuals.¹ Doctors of optometry also reported 60% 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 data further describe a 300% increase in doctors of optometry reporting that they or their staff had been diagnosed or tested positive for COVID-19 (during a three-month period from June to September). Our doctors have played, and continue to play, a high-risk front-line role in supporting Americans throughout the current public health emergency.

¹ <https://www.aoa.org/AOA/Documents/Advocacy/HPI/Emergency%20Department%20Diversions%20Brief.pdf>

Our doctors and their staff will continue to do all they can to address eye and vision care needs in our communities. We believe that it is critical to the overall health of our nation to ensure that health care personnel, including doctors of optometry and their staff members, are prioritized for vaccinations in phase 1a. Already, 43% of doctors of optometry report a health decline in their patients with chronic conditions due to the lack of regular care since the pandemic.²

Sub-Prioritization

We understand that some sub-prioritization of health care personnel may be necessary in certain states as they work to develop their plan for administration and prioritization of the COVID-19 vaccine. However, we believe that those determinations would be best left to states to assess. If sub-prioritization is necessary, it is state leaders who can best assess the needs of their residents. This approach is preferable to the committee dictating how sub-prioritization should be uniformly carried out across our diverse country.

Thank you again for your important work. If additional information is needed, please contact Kara Webb, Director of Coding and Regulatory Policy, at kcwebb@aoa.org.

Sincerely,



William T. Reynolds

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President, Alabama Optometric Association



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Justin Jones, O.D.


President, Arizona Optometric Association



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President, Arkansas Optometric Association

²<https://www.aoa.org/AOA/Documents/Advocacy/HPI/Nationwide%20Pandemic%20Impact%20on%20Optometry%20Practices%20HPI%203rd%20Survey%20Report.pdf>



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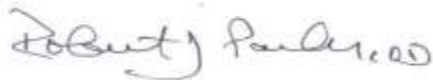
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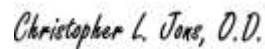
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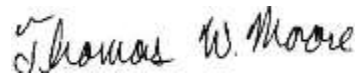
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