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OPTOMETRIC  
ASSOCIATION

December 3, 2020

The Honorable Mike DeWine  
Governor, State of Ohio  
Riffe Center, 30<sup>th</sup> Floor  
77 South High Street  
Columbus, OH 43215-6117

Dr. Bruce Vanderhoff  
Medical Director, Ohio Department of Health  
246 North High Street  
Columbus, OH 43215

Dear Governor DeWine and Dr. Vanderhoff:

On behalf of the Ohio Optometric Association (OOA) which represents over 70% of the state's Doctors of Optometry, thank you for your leadership and guidance during this unprecedented time in our state's history. As we approach what will hopefully be the final stage of the pandemic with the introduction and distribution of approved vaccines, we seek clarification on this process and offer assistance and support of your efforts.

**Vaccine Administration and Distribution**

The OOA and its member optometrists stand ready to assist in the administration of COVID-19 vaccines. The regulatory structure for utilizing optometrists and other providers in the delivery of medications during a declared emergency is already in place and may be implemented immediately. Ohio Revised Code §3701.048 allows the Ohio Department of Health to authorize optometrists and approximately a dozen other licensed health care provider types to "administer, deliver, or distribute drugs" during a declared emergency, regardless of any other statute or rule which otherwise could prohibit such activity.

With a minimum of four years of intense graduate level clinical and didactic instruction in anatomy, physiology, pathology, systemic and chronic diseases, pharmacology, and advanced procedures like ocular injections, and as licensed prescribers of dangerous drugs, optometrists are ideally qualified to assist in emergency efforts related to the vaccine. For these reasons, the legislature rightly determined that optometrists be designated as a part of the emergency response team to administer drugs and other medications.

The state's first responders and front-line critical care providers in hospitals, emergency response units, primary care facilities and long-term care facilities are doing fantastic work in treating those impacted by and infected with COVID-19. If possible, these heroic individuals should not be diverted from their current tasks to administer the vaccine. Instead, the state should rely on those individuals it has already designated in the law through ORC §3701.048,



which includes optometrists, to assist in administering the vaccine. This is a prudent use of the state's limited health care resources and will be especially beneficial to the public as more vaccine doses become available and millions of Ohioans seek immunization. Utilizing the expanded workforce called for in the law will help improve the efficiency of the vaccine distribution process.

### **Vaccination Priority for Health Care Personnel**

Our member doctors and their staff members are proud to serve Ohio's eye health needs, especially during the current pandemic, where their efforts have helped ease the burden on hospitals by treating ocular emergencies in their offices and via telehealth. The CDC's Advisory Committee on Immunization Practices has recognized the need to ensure all "health care personnel" be 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. However, we also recognize and support that within this broad definition of health care personnel, those first responders and front-line critical care providers in hospitals, emergency response units, primary care facilities and long-term care facilities mentioned earlier in this letter, be prioritized.

Doctors of Optometry are the primary care doctors of the eye and visual system and practice in settings which are very accessible to at-risk populations. On a regular basis, optometrists provide care to aging populations and those with systemic and chronic health conditions. 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.<sup>1</sup> 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. The 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). One reason for this is that optometrists may be exposed to patients with COVID-19 early in the course of the disease as conjunctivitis is one of the first reported symptoms of the infection.

Eye doctors have played, and continue to play, a high-risk front-line role in supporting Ohioans throughout the current public health emergency. And, our doctors and their staff will continue to do all they can to address eye and vision care needs in our communities. However, 43% of Doctors of Optometry report a health decline in their patients with chronic conditions due to the

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



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lack of regular care since the pandemic.<sup>2</sup> We believe that it is critical to the overall health of our state's population to ensure that health care personnel, including optometrists and their staff members, are appropriately prioritized for vaccination. Patients must be able to rely on the safe delivery or primary care, including eye care, or this situation may worsen.

Thank you again for your continued leadership during the pandemic. These are extremely difficult times, but please know that the OOA and its member optometrists stand ready to assist state leaders as a resource on eye health and safety. If you have any questions or require additional information, please do not hesitate to contact OOA Executive Director Keith Kerns at [kkerns@ooa.org](mailto:kkerns@ooa.org) or (614) 781-0708.

Again, thank you for all you are doing in protecting the lives of Ohio residents.

Sincerely,

Diana W. Gilbert, OD  
President, Ohio Optometric Association

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