



January 25, 2021

The Honorable Joseph R. Biden, Jr.
President of the United States
The White House
1600 Pennsylvania Ave NW
Washington, DC 20500

Dear President Biden:

The American Optometric Association (AOA) appreciates your efforts to address the ongoing global pandemic. The AOA represents more than 44,000 doctors of optometry, optometric professionals, and optometry students. Throughout the pandemic, doctors of optometry have been working overtime to ensure that America's 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.

The National Strategy for the COVID-19 Response and Pandemic Preparedness clearly outlined the much-needed efforts to expand the range of health care workers that can provide COVID-19 vaccinations. We write to request that the White House Office on COVID-19 Response consider amending the current COVID-19 Public Readiness and Emergency Preparedness Act (PREP Act) declaration to recognize that all doctors of optometry can administer vaccines.¹

Doctors of optometry are the nation's primary care eye doctors. Ninety-nine percent of Americans live in a county with a doctor of optometry providing care there locally.² Overall more than 90% of the U.S. Medicare beneficiary population lives within 15 minutes of a doctor of optometry.³ Doctors of optometry in some states are already authorized to provide vaccinations, including California, Kentucky, Ohio, and Utah. In other states, policy makers are already considering an expansion of vaccination authority to doctors of optometry in response to the current public health emergency. Doctors of optometry have the necessary knowledge to provide vaccines and all optometry schools teach injections as part of optometric training. Additionally, doctors of optometry in 19 states⁴ are already authorized to administer injections as part of their scope of practice. 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 your team works to amend the PREP Act and to develop recommendations for states, we respectfully request that the Administration specifically note the role that doctors of optometry stand ready to play in bolstering the vaccination workforce. The range of key roles and responsibilities of doctors of optometry, as part of the COVID-19 public health response, includes diagnosis and treatment of vision and eye health emergencies, ocular and adnexa injuries and disorders. Doctors of optometry also respond to traumatic

¹ <https://www.whitehouse.gov/wp-content/uploads/2021/01/National-Strategy-for-the-COVID-19-Response-and-Pandemic-Preparedness.pdf>

² <https://www.aoa.org/AOA/Documents/Advocacy/HPI/County%20Data%20Demonstrates%20Eye%20Care%20Access%20Nationwide.pdf>

³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5608548/>

⁴ <https://communityforvision.com/ce-requirements-state/>

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.⁵

Doctors of optometry have played a front-line role throughout the pandemic and will continue to do so. Our AOA Health Policy Institute (HPI) data found that after less than one month into the pandemic in 2020, doctors of optometry had already provided urgent and emergency care to approximately 206,627 individuals.⁶ 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 AOA's member doctors have served the eye health needs of Americans throughout the pandemic and stand ready to assist further. If additional information is needed, please contact Kara Webb, Chief Strategy Officer, at kcwebb@aoa.org.

Sincerely,



William T. Reynolds, O.D.
President
American Optometric Association (AOA)

cc: Ambassador Susan Rice, Lead, Domestic Policy Council
Jeffrey Zients, Coordinator of the COVID-19 Response and Counselor to the President

⁵https://www.aoa.org/AOA/Documents/Advocacy/HPI/HPI_Doctors%20of%20Optometry%20in%20COVID-19%20Preparedness%20Response%20and%20Recovery.pdf

⁶ <https://www.aoa.org/AOA/Documents/Advocacy/HPI/Emergency%20Department%20Diversion%20Brief.pdf>