



AMERICAN OPTOMETRIC ASSOCIATION

April 15, 2020

Rear Admiral (RADM) Sylvia Trent-Adams, Ph.D., R.N., F.A.A.N.
Principal Deputy Assistant Secretary for Health (PDASH)
Office of the Assistant Secretary for Health
U.S. Department of Health & Human Services
200 Independence Avenue, S.W.
Room 715-G
Washington, D.C. 20201

Dear RADM Trent-Adams,

The American Optometric Association (AOA) appreciated the opportunity to meet with you in 2019 to discuss the role of doctors of optometry in our health care system. During the current COVID-19 public health emergency, doctors of optometry are playing a key role in providing urgent and emergent eye care. This care is critical to ensuring that patients do not end up in an emergency room and potentially exposed to COVID-19 during this current public health crisis. As you know, the AOA represents more than 44,000 doctors of optometry, optometric professionals, and optometry students. Doctors of optometry take a leading role in patient care with respect to eye health and vision care, as well as general health and wellbeing. As primary health care providers, doctors of optometry have extensive, ongoing training to examine, diagnose, treat, and manage ocular disorders, diseases, and injuries. They also play an important role in the management of systemic diseases with ocular manifestations including diabetes, hypertension, cardiovascular disease, autoimmune diseases, and neurologic disease. Many doctors of optometry across the country perform blood testing, rapid tests and order additional lab tests. Our member doctors take seriously their role as primary care physicians.

We believe that doctors of optometry, working with the entire health care provider community, are well suited to assist in appropriate testing of patients for COVID-19 and to refer to other physicians as needed. The overwhelming majority of Americans live in a community with a doctor of optometry, specifically, ninety-nine percent of Americans live in a county with a doctor of optometry.¹ Access to additional testing is critical to identifying COVID-19 cases and taking appropriate next steps to stop the spread of the virus. Doctors of optometry who are already providing urgent and emergent care could play a key role in helping to increase testing capacity across the country.

The AOA is calling upon HHS to use the authority granted under the Secretary's March 10, 2020 declaration under the Public Readiness and Emergency Preparedness Act (PREP Act), to issue guidance authorizing licensed doctors of optometry to order and administer COVID-19 tests, including serology tests, that the Food and Drug Administration (FDA) has authorized.

¹<https://www.aoa.org/documents/HPI/HPI%20Uniform%20Edit%20Format%20ACCESS%20TO%20EYE%20CARE.pdf>

We greatly appreciate all of the efforts of the Department of Health and Human Services to assist physicians and their patients across the country. If more information is needed, please contact Kara Webb, Director of Regulatory Policy, at kcwebb@aoa.org.

Sincerely,

A handwritten signature in black ink that reads "Barbara L. Horn, O.D." The signature is written in a cursive, flowing style.

Barbara L. Horn, O.D.
President, American Optometric Association