



William T. Reynolds, O.D.
AOA President

February 1, 2021

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

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

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

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

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

On behalf of America's more than 44,000 doctors of optometry, optometry students, and paraoptometric professionals in more than 10,000 communities across the nation as well as the tens of millions of seniors, veterans, children, and working-age men and women who rely on local optometrists for their primary, medical, chronic, urgent, and emergency eye health and vision care needs, the American Optometric Association (AOA) appreciates your leadership throughout this unprecedented crisis and is thankful for the actions you have taken to support doctors of optometry, other frontline physicians, optometry students, patients, and our communities still struggling under the weight of the pandemic.

Thanks to your efforts, tens of thousands of doctors of optometry, their practices, employees, and patients have benefited as a result of vital federal relief from Paycheck Protection Program (PPP) forgivable loans, Economic Disaster and Injury Loans (EIDL) and advances, and Department of Health and Human Services (HHS) provider relief grants, as well as federal student loan payment deferment and expanded Medicare telehealth provisions – all of which have helped ensure that patients and communities do not go without essential primary eye health and vision care despite massive losses associated with the months-long stoppage in preventive and elective care as well as ongoing burdens stemming from needed yet burdensome virus safety protocols.

While these and other federal relief efforts have helped preserve patient access to essential care and provide the lifeline frontline health care practices needed, many doctors of optometry are still struggling. Optometrists and future doctors of optometry appreciate what Congress has already done to help mitigate the impact of the pandemic; however, more can and must be done to help to ensure continued patient access to needed care. As Congress considers further COVID-19 relief efforts, the AOA respectfully requests that you and your colleagues consider including:

Recognize Doctors of Optometry Nationwide to Administer COVID-19 Vaccines – With COVID-19 vaccine administration efforts ramping up, America’s doctors of optometry are trained, willing, and able to help. While doctors of optometry in some states are already recognized to provide these vaccinations and many others may soon have recognition in other states now working to that end, swift federal action is needed for doctors now sitting on the sidelines waiting to help. Providing federal recognition for doctors of optometry to provide COVID-19 vaccines, potentially under the Public Readiness and Emergency Preparedness (PREP) Act, would help ensure more communities have safe and local access to lifesaving vaccines. Ninety-nine percent of Americans have ready access to a local doctor of optometry, including more than 90 percent of the nation’s most vulnerable, including patients served through Medicare and Medicaid. Doctors of optometry have the necessary knowledge to provide vaccines and all optometry schools include injections courses as part of their rigorous education and training. Additionally, doctors of optometry in 19 states are already authorized to administer injections and in an additional 20 states doctors of optometry are right now authorized to provide anaphylaxis through injection. The AOA supports federal recognition for doctors of optometry as essential members of the healthcare delivery workforce, including under the PREP Act, to provide patients with safe and ready access to lifesaving COVID-19 vaccines.

Extend Medicare Sequester Moratorium Through the Public Health Emergency – With doctors of optometry and others continuing to endure financial strain caused by the pandemic, cuts to Medicare reimbursements are expected to begin April 1, 2021 due to the automatic Medicare sequester. While AOA appreciates Congress including in the *Consolidated Appropriations Act of 2021* a three-month extension of the Medicare sequester moratorium as originally enacted in the *CARES Act*, now is not the time to allow these cuts to go into effect and impact doctors of optometry and others who continue struggling to provide care in communities across the country. The AOA supports and is now calling on lawmakers to extend the Medicare sequester moratorium at least through the end of the COVID-19 public health emergency. We urge inclusion of *H.R. 315, Medicare Sequester COVID Moratorium Act* – bipartisan legislation introduced by Reps. Brad Schneider and David McKinley that will extend the Medicare sequester moratorium through the public health emergency.

Ensure Previous and New HHS Provider Relief Funds Are Not Treated as Taxable Income –Congress has devoted HHS provider relief funds to doctors of optometry and others to help keep essential providers on the frontlines by offsetting new and substantial costs brought on by the pandemic. Like other doctors, the cost of providing care for doctors of optometry has skyrocketed. While patients are still in need of a range of primary and medical eye and vision care, many doctors of optometry have been forced to increasingly keep practices open and seeing patients later and longer while at the same time limiting the number of patients seen each day due to virus safety procedures that must be conducted both before and after each patient. To help alleviate the mounting financial strain on doctors, the AOA urges Congress to ensure that all HHS provider relief grant funding – both previous and new – is not treated as taxable income.

AOA supported H.R. 7819, *the Eliminating the Provider Relief Fund Tax Penalties Act*, and S. 4525 in the 116th Congress to help frontline providers by limiting the tax income liability of HHS provider relief funds and encourages lawmakers to include similar legislation in any final virus relief package.

New Aid for Struggling Doctors of Optometry and Others on the Care Frontlines - While thousands of struggling doctor of optometry practices have already received PPP forgivable loans, EIDL loans and grants, and other federal relief, more help is now needed. After slogging through the multi-month primary care shutdown of early 2020, doctors of optometry are now facing rising personal protective equipment (PPE) and other safety costs as well as a roughly 30 percent reduction in time available for patient care due to necessary but burdensome virus safety protocols necessary both before and after each patient. The AOA supports a new round of PPP, EIDL, and other federal small business relief as well as the setting aside of at least 20 percent of any new funding for smaller businesses with less than 20 employees, including doctor of optometry practices now serving in traditionally underserved rural and urban communities.

Dedicate New Public Health and Prevention Funds to Doctors of Optometry, Including Those Serving the Underserved – Some doctors of optometry, particularly those with a large Medicare patient base, have received vital HHS provider relief grants. These funds have allowed doctors to offset some of the massive costs associated with the federally mandated primary and preventive care stoppage in early 2020. Despite that stoppage, many doctors of optometry remained on the frontlines to address patient concerns remotely, refill prescription medications, and tend to the urgent and emergency eye care needs of their communities, often enduring a large, daily operating loss as a result. Data demonstrate that doctors of optometry provided urgent and emergency care to approximately 206,627 individuals during the one-month measurement period early in the pandemic, diverting a significant percentage of patients away from emergency departments. The AOA supports a new round of funding to the Public Health and Prevention Fund to which doctors of optometry would be eligible. AOA also supports a specific set aside for at least 25 percent of new HHS provider relief grant monies focused on doctors of optometry and others with a large traditionally underserved patient base, including patients insured through Medicare, Medicaid, and CHIP. We also urge Congress to ensure that HHS develops clear reporting guidance for those required to report use of HHS provider relief funds.

Relief for Optometry Students and New Doctors – New and future doctors of optometry are facing a unique set of challenges, including an unstable job market and disruption to instruction and clinical education. AOA supports continued efforts to further extend the timeline on suspension of loan payments beyond September 30, 2021 as well as additional student debt relief and loan forgiveness measures, such as the establishment of a federal and private loan forgiveness program for loans acquired to receive medical and professional training by optometrists and other essential health care workers who have made significant contributions to the COVID-19 pandemic. To further assist new doctors and students, AOA also supports proposals to provide relief for private student loan borrowers and those with commercially held Federal Family Education Loans (FFELs) or Perkins loans owned by universities.

Communities rely on America's doctors of optometry to be there for them in times of emergencies. Whether that emergency develops in the form of a natural disaster, such as a flood or hurricane, or as a virus, like COVID-19, doctors of optometry are an anchor of their communities and we will continue to fulfill our commitment to care for our neighbors in their time of need. In turn, we call on Congress to continue to be

there for doctors and the communities that we care for as we navigate this pandemic together. If you have questions or need more information, please contact AOA staffers Matt Willette mwillette@aoa.org or Sally Guthrie sguthrie@aoa.org.

Sincerely,

A handwritten signature in black ink that reads "William T. Reynolds O.D." The signature is written in a cursive style with a clear "O.D." at the end.

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