

March 18, 2021

Bob Fenton
Acting Administrator
Federal Emergency Management Agency
500 C Street, SW
Washington, DC 20024

Dear Acting Administrator Fenton:

On behalf of the physician and medical student members of the American Medical Association (AMA), we thank the Biden Administration and the Federal Emergency Management Agency (FEMA) for their work to accelerate distribution of COVID-19 vaccines nationwide. While we are encouraged to see rapid improvement in the number of individuals vaccinated each day, we are concerned that the Administration is not utilizing all potential avenues to get these life-saving vaccinations into the arms of patients. Specifically, physician offices have not been included as part of the national vaccination distribution strategy and have likewise been excluded from distribution plans in many states. **As vaccine supply increases over the coming weeks and months, we strongly urge FEMA to consider how they may engage and utilize physician offices as part of the federal COVID-19 vaccination distribution and administration strategy.**

When searching for information regarding vaccinations or when looking to receive a vaccine, the most common place for a patient to turn is to their physician, making physicians uniquely situated to assist in promoting COVID-19 vaccination. However, the current structure for COVID-19 vaccine distribution has left physicians with little to offer patients other than to check with their state or local health department or pharmacies, which can be a challenging process for many patients to navigate. Complicated internet-based appointment scheduling systems have made it difficult for even the savviest of patients. For less technology-savvy elderly patients or those without access to broadband internet or smartphones with cellular data access, these systems have been nearly impossible to navigate. Including physician offices in the distribution strategy for COVID-19 would alleviate a significant number of the challenges certain populations are facing with accessing COVID-19 vaccines, as calling a physician office to secure a vaccine appointment may be a much easier option for populations struggling to secure appointments on internet-based systems. Further, due to existing relationships, physicians can quickly and easily identify patients with co-morbidities that pose the highest risk for severe COVID-19. Physician offices are also able to offer ease of scheduling, and can provide all patients, even those that may not regularly see a physician, an environment that may be easier to access and in which they feel more comfortable and safer receiving the vaccine.

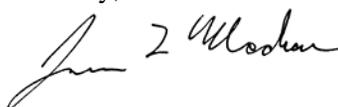
Systemic racism and routine exposures to discrimination within the U.S. health care system have produced an environment in which Black, Hispanic/Latinx, and Indigenous communities are profoundly underserved. Specifically, COVID-19 has disproportionately affected historically marginalized and minoritized populations. To help address this inequity, we need to use every tool to make vaccines as accessible as possible. The exclusion of physician offices from COVID-19 vaccine distribution plans represents a significant missed opportunity to increase the vaccination rate among the nation's traditionally underserved populations. For many Americans, care sites such as hospitals and community

health centers may be some distance from where they live. Rural areas are particularly impacted by this issue and are likewise not targets for mass vaccination events. Residents of urban areas are not immune from barriers to access. Much like in rural areas, hospitals, large pharmacies, and other larger community service providers being utilized for vaccine events are not necessarily located in areas that have been hit hardest by the pandemic. In these areas, physician offices with closer ties to these communities through their patients may have an easier time providing critical vaccine access to those at high risk of severe COVID-19 infection but with more difficulty in accessing vaccines. Additionally, we applaud FEMA's recognition of the critical importance of civil rights considerations in its Community Vaccination Centers Playbook.¹ Given that physician offices are already required and accustomed to complying with a wide variety of access and accommodations requirements rooted in civil rights law, adding physician offices as sites for distribution will support FEMA's resolve to ensure equity in the allocation of scarce resources.

While ensuring access to the vaccine for all who want it is of utmost importance and our primary concern, physicians will also serve a key role in addressing vaccine hesitancy and misinformation among Americans. While current demand for the COVID-19 vaccine is overwhelmingly high, we expect that at some point supply will increase and demand will wane, and what remains will be a significant portion of the population unvaccinated and with varying levels of vaccine confidence. For those nervous about receiving the vaccine, it is unlikely that they will be persuaded to go to the pharmacy, hospital, or vaccination event by federal, state, and local messaging alone. However, physicians have a tremendous opportunity to discuss the benefits and risks of vaccination with these same patients during in-office visits. Physicians can also be effective in countering vaccine misinformation. Research from the Kaiser Family Foundation has found that an individual's own physician or health care provider is the most trusted source for information on the COVID-19 vaccine, with 85 percent of respondents holding this belief no matter their gender, sex, ethnicity or political belief. Should physicians not be able to offer these patients the vaccine at the time of this discussion, it may result in those patients continuing to go unvaccinated. Again, we strongly encourage FEMA to consider that physician offices may be the best available option for COVID-19 vaccine administration to patients who may otherwise face significant barriers to access or uncertainty about whether to obtain a vaccine.

As you continue to engage in this unprecedented national vaccination effort, **the AMA strongly urges FEMA to consider how you may include physician offices in your distribution strategies and utilize this mostly untapped capacity to administer COVID-19 vaccines.** As we rapidly approach half a million American lives lost from COVID-19, we cannot afford to miss any opportunity to provide a potentially life-saving vaccination to any patient, and we must ensure we make getting vaccinated as accessible as possible for our most vulnerable patients. We must also do everything we can to help those hesitant about receiving this vaccine feel comfortable in making the choice to get vaccinated. In those instances, physicians are absolutely the best situated to build confidence and ensure that we not miss critical opportunities to ensure patients are vaccinated. We look forward to working with you on how to best include physician offices in vaccine distribution and administration strategies. Please do not hesitate to reach out to Shannon Curtis, Assistant Director of Federal Affairs, at shannon.curtis@ama-assn.org to further discuss how physicians may best assist you in these critical, life-saving efforts.

Sincerely,



James L. Madara, MD

¹ https://www.fema.gov/sites/default/files/documents/fema_community-vaccination-centers_playbook.pdf
(Appendix C).