



September 13, 2021

The President
The White House
1600 Pennsylvania Ave, N.W.
Washington, DC 20500

Re: Path Out of the Pandemic COVID-19 Action Plan

Dear Mr. President:

On behalf of the American Academy of Family Physicians (AAFP), representing more than 133,500 family physicians and medical students across the country, thank you for recognizing the indispensable role that primary care physicians play in combatting the COVID-19 pandemic, including improving vaccine confidence and vaccination rates and encouraging adherence to other public health measures. I write today to share our recommendations for how your administration can support primary care physicians and practices in their ongoing efforts to protect their patients and communities from COVID-19.

Family physicians have been serving on the frontline of the COVID-19 pandemic for more than a year and a half and were eager to begin administering COVID-19 vaccines to their patients as soon as they were authorized. Even though initial vaccine rollout efforts focused on pharmacies, large health systems, and mass vaccination sites, family physicians actively encouraged their patients to get vaccinated and helped them locate vaccine providers. Over the last several months, many independent family physicians began offering COVID-19 vaccines in their practices. These members have implemented innovative practice workflows to optimize vaccinations and found ways to ensure they could stock COVID-19 vaccines despite disparate access to vaccine supply. We recently spoke with one family physician who travels more than an hour each week to pick up COVID-19 vaccines for their clinic.

The AAFP is strongly supportive of your administrations' whole of government effort to increase vaccination rates across the country. We have publicly supported vaccine mandates for health care workers and agree additional mandates and ongoing adherence to public health measures are vital to stopping the spread of COVID-19. The AAFP agrees, and evidence supports, that primary care physicians are the most trusted source of vaccine information.

As we enter the next phase of the COVID-19 vaccination process, which will include new vaccine mandates, recommended boosters for some patients, and COVID-19 vaccines for children under 12, additional actions are needed to support primary care practices. Primary care physicians are well positioned to provide extensive counseling to vaccine hesitant patients, help ensure adults receive recommended booster shots, and provide children with COVID-19 vaccines once they are authorized. The AAFP strongly urges your administration to:

STRONG MEDICINE FOR AMERICA

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Ensure all primary care physicians who wish to provide the COVID-19 vaccine in their practice have ready access to vaccine supplies. Federal distribution plans for COVID-19 vaccines have focused heavily on mass vaccination sites, retail pharmacies, and, later on, community health centers and, to some extent, primary care practices. The focus on larger facilities has made it challenging for many primary care practices to obtain vaccine supplies, requiring that they travel long distances and jump through additional administrative hoops. We urge your administration to

- **Adjust the federal distribution methodology to prioritize independent primary care practices in the distribution of vaccine supplies.**
- **Address vaccine wastage concerns due to large vial sizes.** Despite updated guidance from the CDC, physicians have been receiving mixed messages about whether it is acceptable to waste COVID-19 vaccine doses. Our members report concerns with vaccine wastage as a primary barrier to offering COVID-19 vaccines in their practice. We recommend your administration encourage the manufacture of smaller vials and facilitate public-private partnerships to reduce wastage.

Work with states and localities to engage with primary care practices in their vaccination efforts. While several states have prioritized distribution of COVID-19 vaccines to primary care physicians, others have instead focused exclusively on large health care systems, pharmacies, and other facilities. Primary care physicians living in states that have not prioritized them report experiencing additional barriers to becoming COVID-19 vaccine providers. Conversely, we have heard from our members and independent state affiliates that when state and local officials proactively recruited family physicians to become COVID-19 vaccine providers, more physicians registered and have had success providing vaccines. These disparate state approaches are contributing to inequities in COVID-19 vaccination rates. The AAFP recommends your administration step up efforts to ensure primary care practices are being prioritized in recruitment and distribution efforts across the country, particularly in states that have not done any outreach to primary care.

Streamline registration, reporting, and other administrative requirements for primary care physicians administering the vaccine in their practice. Primary care physicians are already overburdened with regulatory and other administrative requirements. Many report that they cannot afford to take on the additional requirements associated with becoming a COVID-19 vaccine provider. The AAFP urges your administration to work with the CDC to streamline registration and reporting requirements for primary care physicians administering the COVID-19 vaccine in their practice.

Provide meaningful support to primary care physicians to continue outreach to vaccine hesitant patients by:

- **Developing template materials that physicians can use when contacting patients.** Family physicians report their practices are overwhelmed with responding to the latest surge in COVID-19 cases, catching patients up on services that were delayed earlier on in the pandemic, and gearing up for flu season. Further, physicians are frustrated and burnt-out from dealing with the constant onslaught of misinformation. Providing practices with consumer-friendly template materials they can easily share with patients via letters, email, text, and social media would reduce the strain on practices and support their efforts to contact patients and encourage them to get vaccinated.
- **Require Medicare and Medicaid to pay for vaccine counseling when it is performed separately of vaccine administration.** Providing vaccine counseling and education is a time intensive process, often spanning multiple encounters. We recommend your administration

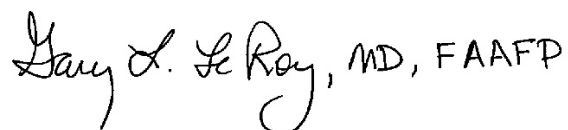
ensure physician practices can be paid for the vital vaccine counseling services they are providing, including when calling patients and encouraging them to be vaccinated.

- **Encourage states and private insurers to pay for COVID-19 vaccine administration services at a rate at least equal to Medicare.** States that have not yet increased Medicaid payment rates for vaccine administration should take advantage of the 100 percent FMAP provided by the American Rescue Plan and increase payment rates at no cost to the state. Your administration should explore rulemaking options to require private insurers to pay for vaccine administration at rates at least equal to the Medicare rate.

Improve information sharing between retail pharmacies, other community COVID-19 vaccine and treatment providers, and primary care. The burden should not fall on primary care physicians to determine if their patients received the COVID-19 vaccine from a community vaccine provider. Further, primary care physicians should be notified if their patients are prescribed or administered monoclonal antibody treatment for COVID-19, so they can provide appropriate follow-up care. Increasing reliance on pharmacists and other providers outside of patients' medical homes squanders the value of physician-patient relationships and leads to care fragmentation.

As you noted in your recent remarks, the path out of the COVID-19 pandemic will take a lot of hard work and is going to take some time. Family physicians have been doing the work of caring for their patients, counseling them on the importance of COVID-19 vaccines and other critical safety measures, and combatting misinformation. We call on the federal government to support and strengthen primary care physicians' efforts. The AAFP stands ready to partner with you to achieve our shared goals of vaccinating the unvaccinated, further protecting the vaccinated, and improving care for those with COVID-19 to save lives and protect our country's economic recovery.

Sincerely,

A handwritten signature in black ink that reads "Gary L. LeRoy, MD, FAAFP". The signature is written in a cursive style with a large, looped "G" and "R".

Gary L. LeRoy, MD, FAAFP
Board Chair, American Academy of Family Physicians