



The Honorable Andrew Cuomo  
Chair, National Governors Association  
444 North Capitol Street, Suite 267  
Washington, DC 20001

Dear Governor Cuomo:

On behalf of the American Podiatric Medical Association (APMA) and our member podiatrists, I commend you and our nation's governors for demonstrating strong, consistent leadership during the COVID-19 global health crisis. As the nation turns to our respective governors for their management of COVID-19 vaccine distribution, APMA writes in support of The Centers for Disease Control and Prevention's (CDC) recommendation for allocating initial supplies of COVID-19 vaccine and urges states to implement these recommendations.

Podiatrists, also known as podiatric physicians and surgeons or doctors of podiatric medicine (DPM), have seen the devastation of this disease up close with their own patients and staff, and especially at hospitals and nursing homes and long-term care settings where they are on staff. As recommended by the CDC and its Advisory Committee on Infectious Practice (ACIP), vaccines should be distributed in phases, and phase 1a includes health-care personnel (HCP)<sup>1</sup> and we believe this is a prudent step. APMA also supports the ACIP's broad definition of HCP to include:

[P]aid and unpaid persons serving in healthcare settings who have the potential for direct or indirect exposure to patients or infectious materials, including body substances (e.g., blood, tissue, and specific body fluids); contaminated medical supplies, devices, and equipment; contaminated environmental surfaces; or contaminated air.<sup>2</sup>

While vaccine supplies are limited, the phase 1a approach ensures that physicians, including podiatric physicians, and other HCP, obtain early access to a vaccine. Podiatric physicians are recognized by the federal government as essential health-care providers during the COVID-19 response.<sup>3</sup> Even with limited supplies of the vaccine, **essential health-care providers, such as podiatric physicians, should receive the vaccine during phase 1a**, so we can continue to serve patients in all health-care settings and at the same time mitigate the risk of spreading COVID-19 virus. We urge all states to incorporate this phase 1a approach.

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<sup>1</sup> Dooling, Kathleen, MD., Et. Al. "The Advisory Committee on Immunizations Practices' Interim Recommendations for Allocating Initial Supplies of COVID-19 Vaccine – United States," Centers for Disease Control and Prevention, Morbidity and Mortality Weekly Report (Vol. 69 December 3, 2020). <https://www.cdc.gov/mmwr/volumes/69/wr/pdfs/mm6949e1-H.pdf> (Last accessed: December 9, 2020).

<sup>2</sup> Centers for Disease Control and Prevention, "Infection Control in Healthcare Personnel: Infrastructure and Routine Practices for Occupational Infection Prevention and Control Services (2019), Appendix 2. Terminology," <https://www.cdc.gov/infectioncontrol/guidelines/healthcare-personnel/appendix/terminology.html> (Last accessed: December 9, 2020).

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## American Podiatric Medical Association

Like all Americans, podiatric physicians are eager for a quick and orderly vaccine distribution process, so we can finally beat this terrible disease. To help with such a process, **APMA urges state governments to include podiatric physicians and podiatric residents in the pool of professionals who can prescribe and administer the COVID-19 vaccine.**

Podiatric physicians and surgeons undergo education and training similar to their allopathic and osteopathic physician colleagues and possess more than enough experience to prescribe and administer the vaccine. Not only do podiatric physicians and surgeons have the training, but podiatrists often treat patients with chronic conditions such as diabetes. These patients frequently see their podiatrists more often and more consistently than their primary care providers, and because of that ongoing relationship, have a high level of trust for their podiatric physicians. Moreover, podiatric physicians have many opportunities to interact with their patients as we are on staff in a variety of health-care settings, such as hospitals, nursing homes, wound care centers, and outpatient surgical centers, among others. Facing a shortage of medical personnel, hospitals and other health-care facilities called upon podiatric physicians and podiatric residents to provide care to patients diagnosed with COVID-19, and podiatric physicians are ready to serve again.

Finally, a recent study published in the *Journal of the American Podiatric Medical Association* found an increase in diabetes-related foot amputations since the beginning of the pandemic.<sup>4</sup> Including podiatric physicians in phase 1a vaccination distribution plan and authorizing podiatric physicians to prescribe and administer the COVID-19 vaccine would ensure that more patients with diabetes will obtain medically necessary foot care from their podiatric physician. Studies prove that care by a podiatric physician can reduce the risks and prevent complications from diabetes, help reduce unnecessary hospitalizations and non-traumatic lower-extremity amputations.<sup>5</sup>

I again thank you for your strong leadership during this global health crisis. APMA is available to be of assistance to you and the National Governors Association. Please contact APMA CEO and Executive Director James R. Christina, DPM, at [jrchristina@apma.org](mailto:jrchristina@apma.org) or 301-581-9200.

Sincerely,



Seth A. Rubenstein, DPM  
President

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<sup>4</sup> Casciato, Dominick, J. et al., "Diabetes-Related Major and Minor Amputation Risk Increased During the COVID-19 Pandemic," *Journal of the American Podiatric Medical Association* (2020) 20-224, <https://doi.org/10.7547/20-224>.

<sup>5</sup> Sloan, F. A., Feinglos, M. N. and Grossman, D. S., RESEARCH ARTICLE: Receipt of Care and Reduction of Lower Extremity Amputations in a Nationally Representative Sample of U.S. Elderly. *Health Services Research*, no. doi: 10.1111/j.1475-6773.2010.01157.x.

<sup>5</sup> Krebs, Christopher, C., "Advisory Memorandum on Ensuring Essential Critical Infrastructure Workers Ability to Work During the COVID-19 Response," Cybersecurity and Infrastructure Agency August 28, 2020) [https://www.cisa.gov/sites/default/files/publications/Version\\_4.0\\_CISA\\_Guidance\\_on\\_Essential\\_Critical\\_Infrastructure\\_Workers\\_FINAL%20AUG%2018v3.pdf](https://www.cisa.gov/sites/default/files/publications/Version_4.0_CISA_Guidance_on_Essential_Critical_Infrastructure_Workers_FINAL%20AUG%2018v3.pdf) (Last accessed: December 9, 2020).