



National Association of VA Optometrists ♦ NAVAO

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21 July 2022

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The Honorable Denis McDonough
Secretary, Department of Veterans Affairs
810 Vermont Ave NW
Washington, D.C. 20420

Dear Secretary McDonough,

The National Association of VA Optometrists (NAVAO) is a not-for-profit organization founded in 1977. Our board and committee members are all VA optometrists. The principal objective of the NAVAO is to encourage and promote the best possible primary eye and vision care for our nation's Veterans.

First and foremost, we would like to thank you for all of your efforts invested into caring for our nation's Veterans. With your leadership, VA continues to provide timely, world-class health care. The VA strategic plan encourages communication to access and maximize performance, evaluate needs, and build long-term relationships and trust. It is in that vein that we are contacting you about VA eye care.

VA Optometry service has a long-standing history and a superb reputation for providing excellence in eye care. Support from the VA and integration with academia has ensured sustainment of this quality eye care for generations of Veterans. However, as you noted in press conferences, the health care market has changed dramatically since the COVID 19 pandemic. With these changes, it is imperative we express concern over VA's ability to continue to recruit and retain optometrists with the desired postgraduate residency training and experience. Additionally, with recent motivations to dissolve the professional standards boards, vulnerabilities in optometry's pay structure, and potential for inconsistencies across the enterprise are likely to be amplified.

Forty-six VA Optometry positions are unfilled as of this writing, many of which are serial re-posts due to an inability to attract applicants. These positions are predominantly in rural areas where access to high-quality eye care is most critical. Rural VA Optometry clinics have stark disadvantages when considering government locality pay is incongruous with market pay and resources to support professional advancements within VA are lacking.

VA Optometry is a health-system entry point for many Veterans. In FY21, 1.272 million unique Veterans were cared for by VA Optometry, with an added 160,469 unique Veterans seen in eye telehealth screenings and 19,913 unique Veterans receiving low vision care by VA optometrists (1). But VA Optometry is at a crossroads. Nearly 25% of VA optometrists are at or near retirement eligibility and early career optometrists are turning away from VA. Estimates in 2018, indicated optometry trainees had an average school indebtedness of approximately \$180,000 (2), with current day estimates now approaching over \$200,000. **Current trends in optometry show the Annual Mean Wage (AMW) for outpatient care centers is \$174,980 (3). The average VA optometrist salary in 2021 within the VA was \$134,602 (1).** This number is further skewed as over 60% of the VA Optometry workforce subsist in the General Schedules' (GS) Grades 14 and 15. Ten percent of whom have compensation arrested at the cap and another 20% who are within 10% of the cap. Meanwhile, early and a proportion of mid-career VA optometrists fall within Grades 12 or 13 with base ranges from \$68,299 to \$105,579, significantly less than the national average for optometrists working in outpatient care centers (4). These discrepancies result in the loss of uniquely qualified candidates at every stage of their careers.

It is vital to ensure all Veterans maintain access to high quality optometry eye care. The NAVAIO is very concerned that VA optometrist salaries are no longer close to what optometrists can make at outside facilities. This means that the VA may not be able to stay competitive in the race for top optometry talent. This, in turn, jeopardizes VA's entire eye care continuum. The VA has already demonstrated that a market responsive pay scale is how it can recruit and retain excellent health care professionals in other disciplines. VA optometrist compensation should be determined in this same impartial way so pay is competitive across the VA. Therefore, we are asking the Department to respond with their support for an optometry market pay analysis that would include VA optometrists on the executive level pay scale.

Thank you for your consideration.

Sincerely,



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cc: Steven L. Lieberman, M.D., MBA, FACHE, FACP, Erica Scavella, M.D., FACP, FACHE

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1. Optometry Service 2021. VA Optometry Service. PowerPoint Presentation NAVAIO, Boston, MA.
 2. Defeating the debt. AOA. (n.d.). Retrieved May 1, 2022, from <https://www.aoa.org/news/inside-optometry/aoa-news/defeating-the-debt?sso=y>
 3. U.S. Bureau of Labor Statistics. Occupational Employment and Wages, May 2021. Retrieved April 26, 2022.
 4. www.opm.gov. U.S. Office of Personnel Management. (n.d.). Retrieved May 1, 2022, from <http://www.opm.gov/>