



American Optometric Association

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March 26, 2014

Robert deV. Frierson  
Secretary, Board of Governors of the  
Federal Reserve System  
20th Street and Constitution Avenue N.W.  
Washington, DC 20551

Dear Mr. Frierson,

The American Optometric Association (AOA) represents approximately 36,000 doctors of optometry, optometry students and paraoptometric assistants and technicians. On behalf of these members, the AOA would like to voice its support for the Federal Reserve System's Board of Governors' proposal to amend its Identity Theft Red Flags rule to reflect the changes to the scope of the term "creditor" outlined in The Red Flag Program Clarification Act of 2010.

The AOA has long held the position that health professionals, including optometrists, should not be considered "creditors" required to comply with the anti-identity theft requirements of the Red Flags Rule. The Red Flag Program Clarification Act of 2010 struck the appropriate balance between protecting consumers and ensuring that health professionals are not unduly burdened by misapplied regulations. Amending the Identity Theft Red Flags rule to reflect Congressional intent is a necessary step and the AOA supports the Board's effort.

Please contact Rodney Peele, Esq., Assistant Director for Regulatory Policy and Outreach at [rpeele@aoa.org](mailto:rpeele@aoa.org) or (703) 837-1348 if you have questions or need additional information about these comments.

Sincerely,

Mitchell T. Munson, O.D.  
President  
American Optometric Association