



January 27, 2021

Nikki Bratcher-Bowman  
Acting Assistant Secretary for Preparedness and Response  
U.S. Department of Health and Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Room 639D  
Washington, DC 20201

Re: Authorization for Trained, Supervised Students in Health Professions to Administer COVID-19 Vaccines under the PREP Act

Dear Acting Assistant Secretary Bratcher-Bowman:

We write as an interprofessional group of 11 associations representing academic institutions currently training nearly one million future health professionals. The U.S. Department of Health and Human Services (“HHS”) has helped expand both the availability of COVID-19 tests and the pool of licensed practitioners authorized to administer COVID-19 vaccinations through Amendments to the Declaration under the Public Readiness and Emergency Preparedness (“PREP”) Act. We ask that you use this mechanism again to further supplement the workforce approved to administer COVID-19 vaccines by issuing a PREP Act declaration to include students in health professions who are trained to give intramuscular injections with supervision. Our collaborative, [Students Assist America](#), is mobilizing students in communities across all 50 states and U.S. territories who are trained to vaccinate and stand ready to help.

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Specifically, we ask HHS to issue a PREP Act declaration that all students who meet this criterion upon verification by a licensed faculty supervisor are authorized to administer any COVID-19 vaccine that the Food and Drug Administration (“FDA”) authorizes or approves. Inconsistent workforce protocols across states are contributing to uneven distribution and avoidable delays in vaccinations. Therefore, HHS should clarify that this declaration supersedes any state regulation or gubernatorial order that would prevent these students from administering COVID-19 vaccines. We are witnessing the devastating effects of a confusing patchwork of approaches to mass vaccination, and we ask for your help to intervene and create a national framework for vaccinators that includes qualified students. It is notable that only eight states mentioned deploying students as part of their distribution plans submitted to the CDC in October. Neglecting this available and willing workforce is causing unnecessary barriers to access to COVID-19 vaccines that can and must be quickly broken down.

Student vaccinators have been proven safe and effective for more than two decades in influenza vaccination efforts as well as the recent H1N1 response. While medical, nursing, pharmacy and PA students have typically been deployed for this purpose, there are many other types of students who are trained to safely give injections as part of their education. [Students Assist America](#) has access to the students named above as well those studying optometry, dentistry and dental hygiene, and veterinary medicine – totaling more than 830,000 who would qualify under this declaration. All of these students are either already trained to safely give intramuscular injections with supervision or can be quickly trained to translate their injection method to vaccinate in the deltoid muscle of the arm. There are other types of students who are not currently represented in SAA that would be eligible to help vaccinate under this proposed declaration, and we need to open the doors to all who are willing to help.

Given the expressed goal of the Biden Administration to reach 100 million vaccinations within the first 100 days, we ask that you alleviate an already untenable burden on our healthcare workforce and bring in additional qualified hands in a unified, national approach to speed delivery of vaccines and help with the related tasks of this unprecedented effort. Our collective commitment is to work diligently with our member institutions to get them engaged with their local mass vaccination efforts, as many currently are, and to enlist as many of these 830,000 students as quickly as possible to help our nation end this crisis.

Sincerely,

Robert A. Cain, DO  
President and CEO  
American Association of Colleges of Osteopathic Medicine

Mary Jo Bondy, DHEd, MHS, PA-C  
Chief Executive Officer  
Physician Assistant Education Association

Andrew T. Maccabe, DVM, MPH, JD  
Chief Executive Officer  
Association of American Veterinary Medical Colleges

Laura Magaña, PhD, MS  
President & Chief Executive Officer  
Association of Schools & Programs in Public Health

Lucinda L. Maine, Ph.D., R.Ph.  
Executive Vice President and CEO  
American Association of Colleges of Pharmacy

Dawn M. Mancuso, MAM, CAE, FASAE  
Executive Vice President/CEO  
Association of Schools and Colleges of Optometry

David J. Skorton, MD  
President and Chief Executive Officer  
Association of American Medical Colleges

Darla Spence Coffey, PhD, MSW  
President and CEO  
Council on Social Work Education

Deborah Trautman, PhD, RN, FAAN  
President and CEO  
American Association of Colleges of Nursing

Karen P. West, DMD, MPH  
President and CEO  
American Dental Education Association

cc: Daniel J. Berry, Acting General Counsel  
Lisa Barclay, Deputy General Counsel  
Felicia Collins, Acting Assistant Secretary of Health