

February 2, 2021

Ms. Nikki Bratcher-Bowman  
Acting Assistant Secretary for Preparedness and Response  
Office of the Secretary  
Department of Health and Human Services  
200 Independence Avenue SW  
Washington, DC 20201

**RE: Using the PREP Act to Engage Retired Pharmacists for COVID-19 Vaccination Services**

Dear Ms. Bratcher-Bowman:

On behalf of the undersigned professional pharmacy organizations, we applaud your efforts to expand the vaccinators workforce by issuing the Fifth Amendment to the Public Readiness and Emergency Preparedness Act (PREP) to enable healthcare providers licensed or certified to prescribe, dispense, and/or administer COVID-19 vaccines in any other state or territory and ensure certain healthcare workers, who have held an active license or certification to prescribe, dispense, or administer vaccines under the law of any State within the last five years, which is inactive, expired or lapsed, are able to also aid in COVID-19 vaccination efforts.<sup>1</sup> However, we are concerned that similarly situated pharmacists and pharmacy technicians were not included. **Recently inactive pharmacists and pharmacy technicians are ready and able to help meet President Biden's goal of achieving 100 million Americans vaccinated in his first 100 days. We urge you to expand the Fifth Amendment to the PREP Act and include them in the authorization.**

Every state allows pharmacists to administer vaccinations to patients, and pharmacists are well trained to undertake this service. Last year, HHS leveraged the PREP Act to authorize pharmacists to order and administer, and pharmacy technicians, under supervision of a pharmacist, to administer vaccinations for COVID-19 and pediatric vaccinations. The PREP Act amendment should allow pharmacists who have held an active license within the last five years to order and administer COVID-19 vaccines, and allow pharmacy technicians who have held an active license or certification within the last five years to administer COVID-19 vaccines, under pharmacist supervision.

**We urge you to expand the PREP Act Fifth Amendment to allow recently inactive pharmacists and pharmacy technicians to serve as vaccinators in our national effort to distribute the COVID-19 vaccine.**

Our organizations stand ready to help identify and support pharmacy personnel willing to contribute to our national COVID-19 response.

Thank you for your consideration.

Sincerely,

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<sup>1</sup> Department of Health and Human Services, Office of the Secretary, Fifth Amendment to Declaration under the Public Readiness and Emergency Preparedness Act for Medical Countermeasures Against COVID-19. Jan. 28, 2021 (<https://www.phe.gov/Preparedness/legal/prepact/Pages/COVID-Amendment5.aspx#f1>).

AACP (American Association of Colleges of Pharmacy)

AMCP (Academy of Managed Care Pharmacy)

APhA (American Pharmacists Association)

ASCP (American Society of Consultant Pharmacists)

ASHP (American Society of Health-System Pharmacists)

CPNP (College of Psychiatric and Neurologic Pharmacists)

HOPA (Hematology/Oncology Pharmacy Association)

NACDS (National Association of Chain Drug Stores)

NASPA (National Alliance of State Pharmacy Associations)

NCPA (National Community Pharmacists Association)