

June 21, 2021

The Honorable Xavier Becerra
Secretary
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

RE: Request for Public Readiness and Emergency Preparedness Act (PREP Act) Declaration Amendment to Authorize Pharmacy Personnel to Administer ACIP Recommended Vaccines to Adults and Extend Flexibilities Past the Public Health Emergency

Dear Secretary Becerra:

The National Association of Chain Drug Stores (NACDS) commends your strong leadership and action to pull our nation through to the other side of the COVID-19 pandemic. We are proud to continue partnering during the Biden-Harris Administration's National Month of Action and beyond, helping ensure the public has broad, equitable access to critically needed preventive care, including testing and vaccines. To help pharmacies continue delivering needed access to COVID and routine vaccinations, in addition to COVID testing, we ask your administration to amend the current PREP Act declaration to include routine adult vaccinations, as was done for childhood vaccinations, in addition to extending the pharmacy authorities granted under the PREP Act beyond the declared Public Health Emergency.

As pharmacies prepare to meet heightened demand for vaccination this upcoming flu season, efficiently maximizing the use of all pharmacy team members, including pharmacists, pharmacy technicians, and interns, is critical. Consider that during the 2020-2021 flu season, pharmacies provided more than 47 million flu shots (an increase of 12 million shots over the prior season), accounting for more than 58% of all flu shots given across pharmacies and physician offices.¹ Beyond expanding access to flu shots and other critical adult vaccinations, this fall pharmacies simultaneously are focused on ramping up efforts to vaccinate younger children against COVID and deliver boosters to different adult populations.

We strongly urge your administration take swift action to amend the current PREP Act declaration to authorize pharmacists, pharmacy technicians, and interns to administer all ACIP recommended vaccines to individuals 18 years and older – just as they are allowed to do for children ages 3-18.

¹ <https://www.cdc.gov/flu/fluview/dashboard/vaccination-administered.html>

The PREP Act declaration amendments and guidances have been instrumental in empowering pharmacies to better serve their broader communities and meet public demand for pharmacy care services. Indeed, since HHS' issuance of the amendments and guidances,² pharmacy teams have been able to administer COVID-19 vaccinations to individuals 3 years and older, and ACIP recommended vaccines to children aged 3 through 18 years of age. Throughout this time, pharmacy technicians and interns have worked alongside pharmacists to safely and effectively deliver vaccinations to the public.

We now ask your administration to broaden the authorization for pharmacy personnel to administer to adults the same types of vaccine that they can administer to children. In doing so, pharmacies will have the enhanced ability to continue to meet public demand for vaccine services as we enter the upcoming influenza season. This authorization for more available vaccinators is even more important as pharmacies ramp up efforts to vaccinate younger children against COVID and deliver boosters to different adult populations. Pharmacy's vital role in the nation's COVID-19 vaccination campaign to date has included more than 85 million COVID-19 vaccine doses provided (representing more than 25% of all doses given nationally to date), and 50% of all COVID-19 vaccine doses administered in recent weeks, including more than 3 million doses to adolescents since May 10th, and 40% of doses provided to racial and ethnic minority groups and in zip codes with high social vulnerability.³ Fully utilizing pharmacy teams is vital as pharmacies strive to continue providing this equitable access to needed care across America.

We strongly urge your administration take swift action to amend the current PREP Act declaration to include an extension beyond the declared Public Health Emergency, for pharmacists to order and administer, and pharmacy technicians and interns to administer, COVID-19 vaccines, COVID-19 tests, and all ACIP recommended vaccines to individuals 3 years and older.

Data continue to emerge showcasing the drop in routine vaccinations in both adult populations and children, leaving the nation vulnerable to outbreaks of vaccine-preventable diseases on top of the ongoing COVID-19 pandemic. Additionally, COVID-19 testing will remain an important aspect of the nation's response and recovery efforts, especially to maintain the opening of schools and businesses into the future. Therefore, to help ensure the public continues to have uninterrupted access to these key interventions at their local, trusted pharmacy, we ask that a subsequent PREP Act

² <https://www.phe.gov/Preparedness/legal/prepact/Documents/pharmacist-guidance-COVID19-vaccines-immunity.pdf>; <https://www.govinfo.gov/content/pkg/FR-2020-08-24/pdf/2020-18542.pdf>; <https://www.federalregister.gov/documents/2020/12/09/2020-26977/fourth-amendment-to-the-declaration-under-the-public-readiness-and-emergency-preparedness-act-for>; <https://www.hhs.gov/sites/default/files/prep-act-guidance.pdf>

³ <https://www.cdc.gov/vaccines/covid-19/retail-pharmacy-program/index.html>

declaration amendment include an extension beyond the Public Health Emergency for pharmacists to order and administer, and for pharmacy interns and technicians to administer, COVID-19 tests, COVID-19 vaccinations, and ACIP-recommended vaccinations for individuals 3 years and older. Such an extension should last until October 2024, when the PREP Act authorities taken under a federal contract will expire.

We look forward to our continued work with your administration as we enter the next phase of this pandemic. To discuss this matter further, please contact NACDS' Christie Boutte, Senior Vice President of Reimbursement, Innovation and Advocacy at CBoutte@NACDS.org or 703-837-4211.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven C. Anderson, FASAE, CAE, IOM
President & Chief Executive Officer