

June 23, 2021

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Re: Ensure Sustained Expanded Access to Essential Vaccine Services for New Yorkers Beyond the Pandemic via the PREP Act

Dear Governor Cuomo:

As the nation begins to enter recovery from COVID-19, pharmacies remain dedicated to providing Americans access to quality convenient care. Pharmacies stepped up to serve the public at every opportunity —especially when granted expanded authority through the Public Readiness and Emergency Preparedness Act (PREP Act) — improving access to testing and partnering to provide enhanced access to vaccines. The National Association of Chain Drug Stores (NACDS) recognizes New York’s efforts to leverage pharmacies, via emergency executive orders, to provide additional avenues of care for New Yorkers. But now more than ever, New Yorkers need the momentum to be sustained to continue vigorous mitigation and recovery efforts during the pandemic and beyond. **Thus, on behalf of our members operating in New York, NACDS strongly urges the state of New York to recognize the flexibilities granted through the PREP Act, and to make such flexibilities permanent, to ensure New Yorkers will have continued access to essential vaccine services via community pharmacies.**

Pharmacies were committed to helping the nation expeditiously expand equitable access to vaccinations and help mitigate and eventually recover from the pandemic. However, the importance of community pharmacies in vaccine access and delivery was growing even prior to the COVID-19 pandemic. In 2018, community pharmacies delivered the influenza vaccination to an estimated 32% of adults. Pharmacist involvement in administering immunizations is correlated with higher rates of immunizations, compared to administration of vaccines by traditional providers.¹ And providing access to vaccines during non-traditional hours has been critical to reach people without reliable transportation access and those with non-traditional work schedules or the inability to take off from work or school to get a vaccine.

The value of leveraging pharmacies and full pharmacy staff to expand access to essential vaccine services was further underscored by the federal government. The HHS-issued PREP Act declaration, amendments, and guidance have been instrumental in empowering pharmacies to better serve their broader communities and meet public demand for pharmacy care services. Since HHS (the Department of Human Health Services)’ issuance of the amendments and guidance,² pharmacy teams have been able to administer COVID-19 vaccinations to individuals 3 years and older, and ACIP (Advisory Committee on Immunization Practices) recommended vaccines to children aged 3 through 18 years of

¹ Isenor, J., Edwards, N., Alia, T. (2016). Impact of pharmacists as immunizers on vaccination rates: A systematic review and meta-analysis. *Vaccine*, 34(47) 5708–5723.

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>

age. Throughout this time, pharmacy technicians and interns have worked alongside pharmacists to deliver vaccinations safely and effectively to the public.

The residents of New York would benefit from the state recognizing the expanded flexibilities granted under the PREP Act and permanently broadening the authorization for pharmacy personnel to administer vaccines. 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 by efficiently maximizing the use of all qualified vaccinators and community vaccine destinations. 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) across the nation, accounting for more than 58% of all flu shots given across pharmacies and physician offices.³ 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.

Data continues to emerge highlighting 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, states should recognize the successful efforts of the PREP Act. Furthermore, such flexibilities 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, to extend beyond the public health emergency should be made permanent to provide New Yorkers sustained access to convenient, quality care and ensure they are protected from vaccine-preventable diseases.

Fully utilizing pharmacy teams is vital as pharmacies strive to continue providing this equitable access to needed care across America. Thus, NACDS strongly urges the state of New York to recognize the benefits of supporting the PREP Act and leveraging pharmacies to continue enhancing broader access to vaccinations for Americans including those in high social vulnerability communities, beyond the current pandemic. We welcome the opportunity to discuss this matter further – please contact NACDS' Anne Fellows at AFellows@NACDS.org.

Sincerely,



Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer
National Association of Chain Drug Stores

³ <https://www.cdc.gov/flu/fluview/dashboard/vaccination-administered.html>