



February 4, 2022

The Honorable Patty Murray  
Chair  
Committee on Health, Education, Labor  
and Pensions  
U.S. Senate  
Washington, DC 20510

The Honorable Richard Burr  
Ranking Member  
Committee on Health, Education, Labor  
and Pensions  
U.S. Senate  
Washington, D.C. 20510

Dear Chair Murray and Ranking Member Burr,

The undersigned organizations, members of the Federation of Associations of Schools of the Health Professions (FASHP), thank you for your work on the recently released discussion draft of the *PREVENT Pandemics Act*. FASHP welcomes the opportunity to comment on the draft bill and looks forward to lending our support as you prepare the bill for final consideration. We respectfully request the addition of language authorizing health professions students to serve as vaccinators to ensure an adequate supply of qualified vaccinators in times of a public health emergency. Due to administrative action, over 1 million qualified and supervised health professions students are supplementing the nation's vaccination efforts during the COVID-19 Public Health Emergency (PHE). Legislation is required to codify this needed authority for future pandemics.

FASHP was created in 1968 as a forum for representatives of health professions education institutions to address education's role in organizational patterns of health care; to encourage effective collaboration among the professions in education and practice; to prepare health professions education for the future; and to serve as a liaison with other organizations sharing an interest in health professions education. FASHP is comprised of 18 associations representing a health professions education community that includes 7,429 programs, institutions, hospitals, and health systems, and more than 1.3 million students, faculty, clinicians, administrators, residents, and researchers. Together, FASHP members have also been mobilizing practitioners, faculty, and students to assist in the COVID-19 response efforts.

Recognizing that an insufficient workforce hindered the pace of the initial COVID-19 vaccination rollout, we advocated for qualified health professions students to deliver vaccines. In March 2021, the Secretary of the Department of Health and Human Services issued the seventh amendment to the Public Health Readiness and Emergency Preparedness (PREP) Act declaration that allows qualified health professions students to administer COVID-19 vaccinations with supervision. Unfortunately, that authority will end with the expiration of the COVID-19 public health emergency.

Adding language to allow health profession students to vaccinate in the *PREVENT Pandemics Act* is important to our community because it ensures that more than one million medical, nursing, pharmacy, pharmacy intern, midwife, paramedic, advanced or intermediate emergency medical technician, physician assistant, respiratory therapy, dental, podiatry, optometry or veterinary students can administer vaccines with supervision during federally declared public health emergencies. It also enables schools to put in place procedures for rapid deployment and



eliminates the state-level inconsistencies and confusion encountered during the initial COVID-19 pandemic response.

Thank you for your commitment to our health professions students and workforce and your efforts to ensure the country is prepared for future public health emergencies. We look forward to working with you to include language authorizing health professions students to vaccinate in the *PREVENT Pandemics Act*. For questions or additional information, please contact Jordan Vivian at [jvivian@aacom.org](mailto:jvivian@aacom.org).

Sincerely,

Federation of Association of Schools of the Health Professions

American Association of Colleges of Nursing  
American Association of Colleges of Osteopathic Medicine  
American Association of Colleges of Pharmacy  
American Association of Colleges of Podiatric Medicine  
American Dental Education Association  
American Occupational Therapy Association  
American Physical Therapy Association  
Association of Accredited Naturopathic Medical Colleges  
Association of American Medical Colleges  
Association of American Veterinary Medical Colleges  
Association of Chiropractic Colleges  
Association of Schools and Colleges of Optometry  
Association of Schools Advancing Health Professions  
Association of Schools and Programs of Public Health  
Association of University Programs in Health Administration  
Council on Social Work Education  
Physician Assistant Education Association