



August 19, 2020

**RE: NGA MEMORANDUM ON PREPARING FOR THE COVID-19 VACCINE AND CONSIDERATIONS FOR MASS DISTRIBUTION**

The American Pharmacists Association (APhA), National Alliance of State Pharmacy Associations (NASPA) and the National Community Pharmacists Association (NCPA) are writing you today regarding the National Governors Association (NGA) memorandum for best practices on preparing for the COVID-19 vaccine and considerations for mass distributions. We commend NGA's recommendations to the Governors' Offices highlighting strategies and timing sensitivities to meet the challenge of mass distribution once a vaccine is available.

To realize the positive outcomes hoped for, all community-based pharmacists and pharmacies must be part of the solution. It would be a mistake for state and local public health departments to contract solely with certain national chains to distribute vaccines via pharmacies, leaving at-risk patients in rural and urban areas, especially underserved communities, without sufficient access. Recent surveys have reported a significant number of Americans are hesitant to receive the COVID-19 vaccine when it becomes available.<sup>1</sup> Disrupting existing and trusting pharmacist-patient relationships by directing patients to a limited number of pharmacies will further exacerbate vaccine hesitancy among communities.

The 2019 NCPA digest shows there are approximately 21,767 independent pharmacies and 22,812 large national chains.<sup>2</sup> An NCPA analysis showed that 20.5% of zip codes that have a pharmacy do not have a chain drug store, further supporting the case for broad-based utilization of all community-based pharmacy practices. **Therefore, we urge NGA to advise state governors to include all community-based pharmacists and pharmacies willing and able to administer COVID-19 and other recommended vaccines in state planning for vaccination distribution, not just select national pharmacy chains.**

The organizations signed onto this letter support equal access to vaccines and other therapies by community-based pharmacists and pharmacies that address the public health needs of communities served. States must effectively utilize their public health sector resources and workforce (including pharmacists) to equitably increase access to the COVID-19 vaccine and assuage vaccine hesitancy citizens may have. Community-based pharmacists are especially important access points for administration of the vaccine and properly educating the community on its importance. More than 360,000 pharmacists have been trained to administer vaccines across the lifespan and stand ready and able to meet the healthcare needs of their patients and communities. Pharmacists are clinically trained to assess patients' vaccine status, recommend and discuss indicated vaccines, administer vaccines, document administered vaccines, and conduct patient follow-up activities, if indicated. **We urge NGA to recognize and highlight the value of all community-based pharmacists and pharmacies as work continues to inform Governors across the country on COVID-19 vaccine distribution strategies.**

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<sup>1</sup> <https://www.reuters.com/article/us-health-coronavirus-vaccine-poll-exclu/exclusive-a-quarter-of-americans-are-hesitant-about-a-coronavirus-vaccine-reuters-ipsos-poll-idUSKBN22X19G>

<sup>2</sup> 2019 NCPA Digest, Changing the Pharmacy Payment Model

### **Specific Asks of Governors Planning for Mass Distribution of COVID-19 Vaccine**

When convening partners to begin distribution plans, community-based pharmacists and pharmacies must be considered a key stakeholder to organize operations and innovate new solutions. Pharmacists' locations and relationships within the communities they serve makes them uniquely qualified to identify gaps and opportunities, as well as facilitate communication to the public and provide data to help tailor ongoing distribution efforts. **We recommend that Governors and their public health departments adopt the following:**

- *Grant pharmacists immunization authority for all FDA approved or authorized, or ACIP recommended, COVID-19 vaccine to patients 3 years and older;*
- *Provide liability protections, as is provided to other providers, to pharmacists; and*
- *Add pharmacists as other licensed providers or non-physician providers in Medicaid to ensure pharmacists can provide vaccines for this vulnerable population.*

In addition, Governors should direct their public health departments to include community-based pharmacies and pharmacists in any mass distribution efforts. The majority of community-based pharmacy practices, including the nearly 22,000 independent community pharmacies are willing and able to do their part to increase access to and administration of COVID-19 vaccine when it becomes available. **Community pharmacists must be immediately enrolled with their state and county health departments via memorandums of understanding delineating the arrangements necessary to get these vaccines to the communities.** Pharmacies can appropriately store vaccines and submit documentation to identified systems for tracking vaccine administration. As evidenced during this pandemic, pharmacists are experts at exercising flexibility into their workflow and adjusting rapidly as needed.

### **Conclusion**

As the most accessible healthcare providers in many communities, pharmacists are well positioned to help expand vaccination capacity to high-risk populations who see their pharmacist more often than any other provider. All community-based pharmacists and pharmacies must be included in COVID-19 vaccine distribution efforts, not just certain national chains. **The value pharmacists across the profession have displayed in vaccine efforts should not be ignored and we urge NGA to support this message as recommendations are being communicated to Governors' offices.** Thank you for your time and consideration. If you have any questions, or if we can be of any assistance please do not hesitate to contact NCPA's Ronna Hauser, Vice President – Policy & Government Affairs Operations at [ronna.hauser@ncpa.org](mailto:ronna.hauser@ncpa.org).

Sincerely,

American Pharmacists Association (APhA)  
National Alliance of State Pharmacy Associations (NASPA)  
National Community Pharmacists Association (NCPA)