



AMERICAN ASSOCIATION
OF MEDICAL ASSISTANTS®

20 N. WACKER DR., STE. 1575
CHICAGO, ILLINOIS 60606

January 13, 2021

RE: January 1, 2021, draft COVID-19 Vaccination Plan of the Department of Public Health

I am writing on behalf of the American Association of Medical Assistants® (AAMA), the national professional society representing over 80,000 members and CMAs (AAMA)®, and the Georgia Society of Medical Assistants, an affiliated state society of the AAMA.

It has been brought to my attention that the [Georgia COVID-19 Vaccination Plan](#) contains the following language on pages 17 and 18:

Under Georgia's law, only certain licensed health professionals are authorized to administer vaccines. Currently, no provisions in the law state that Georgia's non-licensed health care professionals have the authority to vaccinate. "The Georgia Emergency Act of 1981 could be interpreted to provide the nonlicensed health care professionals the authority to vaccinate by deeming such individuals as emergency management workers and volunteers that are engaged in emergency management activities."

Various health professionals are currently considered to have the authority to administer vaccines under the Georgia Code due to their job duties, job descriptions, protocols, or delegation from a physician. Some of these professionals may only administer medications/drugs while under the supervision of another. Georgia Code includes provisions for pandemic influenza vaccines, but it does not include vaccines that would protect against other pandemic diseases (i.e. COVID-19). Working with our legal team, the Core COVID-19 Vaccine Planning Team will explore changes in applicable statutory language. Discussions regarding the implementation of an emergency order to provide an exception that would allow these health professionals to administer COVID-19 are currently underway.

I would direct your attention to the following excerpts from the Georgia statutes and the regulations of the Georgia Composite Medical Board:

[§ 43-34-44. Role of medical assistants clarified](#)

Nothing in this article shall be construed to prohibit the performance by medical assistants of medical tasks, including subcutaneous and intramuscular injections; obtaining vital signs; administering nebulizer treatments; or other tasks approved by the board pursuant to rule, if under the supervision by a physician in his or her office; provided, however, that this shall not require on-site supervision at all times, or the performance by medical assistants of medical tasks ordered by a physician assistant or advanced practice registered nurse delegated the authority to issue such an order in accordance with law and pursuant to rules of the board.

[360-3-.05 Medical Assistants, Polysomnography Technologists, and Radiology Technologists.](#)

(1) It shall be grounds for disciplinary action by the Board if a physician aids or abets another person in misrepresenting his/her credentials or engaging in unlicensed practice. Engaging in unlicensed practice



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includes delegation by a physician of professional responsibilities to a person who is not authorized to provide such services. A physician may delegate the performance of certain medical tasks to an unlicensed person with appropriate supervision as provided herein.

(a) Medical Assistants

1. For purposes of this rule, a medical assistant is an unlicensed person employed by the physician to whom he or she delegates certain medical tasks.

(i) A physician may delegate to a medical assistant the following medical tasks: subcutaneous and intramuscular injections; obtaining vital signs; administering nebulizer treatments; or removing sutures and changing dressings.

(ii) Physicians or physician assistants under basic job description and/or advanced practice nurses under protocol must be on-site for a medical assistant to administer subcutaneous and intramuscular injections, to administer nebulizer treatments, and to remove sutures and change dressings. It is not required for a physician to be on-site for a medical assistant to obtain vital signs.

(iii) Physician shall only allow medical assistants to provide services for which they have been properly trained. Physicians shall maintain accurate and complete records of professional services rendered.

(iv) Nothing in this rule prohibits the performance of tasks by medical assistants that would not otherwise require a license. [emphases added]

Because COVID-19 vaccinations are intramuscular injections, my legal opinion is that Georgia law permits physicians to assign to knowledgeable and competent medical assistants the administration of COVID-19 vaccinations as ordered by the overseeing/delegating physician, and under direct/onsite supervision of the overseeing physician.

Thank you for your consideration. Please let me know whether I can be of further assistance.

Very truly yours,

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