



AMERICAN ASSOCIATION
OF MEDICAL ASSISTANTS®

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CHICAGO, ILLINOIS 60606

The Honorable Ned Lamont
Office of the Governor
State of Connecticut
210 Capitol Avenue
Hartford, CT 06106

December 14, 2020

Dear Governor Lamont:

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 Connecticut Society of Medical Assistants, an affiliated state society of the AAMA.

With COVID-19 vaccinations beginning in the United States, the Centers for Disease Control and Prevention (CDC) published the [COVID-19 Vaccination Program Interim Playbook for Jurisdiction Operations](#). The purpose of this publication is to assist state and local public health programs “to plan and operationalize a vaccination response to COVID-19 within their jurisdictions.” Note the reference to medical assistants as “vaccinators” on page 22 of this CDC publication (first attachment):

Verify COVID-19 vaccination providers have active, valid licensure/credentials to possess and administer vaccine. This licensure verification is needed only for those with prescribing authority [e.g., MD, DO, RPh, NP, PA] who will oversee COVID-19 vaccine administration. Credential verification is not required for *vaccinators* who work under the authority of someone with a higher level of licensure (i.e., not required for pharmacy techs/interns, RNs, LPNs, *medical assistants*, etc.). (emphasis added)

As demand for allied health professionals to administer the COVID-19 vaccines has started to increase rapidly, state governors have issued executive orders waiving certain elements of their state law to enable knowledgeable and competent medical assistants to be delegated, and to perform, COVID-19 vaccinations. For example, on December 4, 2020, Tennessee governor Bill Lee issued [Executive Order No. 68: An Order to Facilitate the Continued Response to COVID-19 By Increasing Health Care Resources and Capacity](#) (second attachment). In part, this order authorizes “medical assistants certified by the American Association of Medical Assistants [to be delegated] tasks that would normally be within the practical nurse scope of practice, including, but not limited to, administration of COVID-19 vaccinations.” Tasks delegable to certified medical assistants “are required to have been ordered and authorized by a Tennessee licensed



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practitioner with prescriptive authority” and “performed under the supervision of the delegating registered nurse.”

Also, state departments of health have clarified (as necessary) the fact that COVID-19 vaccinations may be delegated to, and may be administered by, knowledgeable and competent medical assistants. For example, the Washington State Department of Health published a list of health professionals permitted to administer the COVID-19 vaccine under licensed provider authority and supervision (third attachment). Note the following:

Medical assistant-certified

Can administer vaccines? Yes

Requires supervision? Yes

Task must be delegated by a provider with the activity in their scope of practice: MD/DO, RN, ARNP, Naturopathic Physician, PA/DOPA. The requirements for the supervising health care practitioner to be physically present and immediately available in the facility are waived under Governor Inslee’s Proclamation 20-32. The supervisor only has to be immediately available, which may be by remote means.

Issuing executive orders allowing medical assistants to administer COVID-19 vaccinations is consistent with similar measures that have been taken under federal and state law in regard to medical assistants performing nasopharyngeal swabbing for COVID-19 testing.

The Centers for Medicare & Medicaid Services (CMS) published an interim final rule with comment period entitled “[Medicare and Medicaid Programs; Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency](#)” (85 FR 19247 through 19253) in the April 6, 2020, *Federal Register*. Its language supports the legal position that medical assistants are permitted to perform nasopharyngeal swabbing to test for COVID-19. Note the following excerpts from this CMS rule:

Even if the patient is confined to the home because of a suspected diagnosis of an infectious disease as part of a pandemic event ... a nasal or throat culture ... could be obtained by an appropriately-trained *medical assistant* or laboratory technician ... Services furnished by auxiliary personnel (such as nurses, *medical assistants*, or other clinical personnel acting under the supervision of the [rural health clinic] or [federally qualified health center] practitioner) are considered to be incident to the visit and are included in the per-visit payment. (emphases added)

The New York State Board of Medicine has taken the position that unlicensed allied health professionals such as medical assistants may not be delegated by physicians certain invasive procedures. In response to the early crisis period of the COVID-19 pandemic, New York Governor Andrew Cuomo declared a state disaster emergency that included the following provisions (fourth attachment):

I hereby temporarily suspend or modify ... the following:

...

Sections 6521 and 6902 of the Education Law, to the extent necessary to permit unlicensed individuals, upon completion of training deemed adequate by the Commissioner of Health, to collect throat or nasopharyngeal swab specimens from individuals suspected of being infected by COVID-19, for purposes of testing; and to the extent necessary to permit non-nursing staff, upon completion of training deemed adequate by the Commissioner of Health, to perform tasks, under the supervision of a nurse, otherwise limited to the scope of practice of a licensed or registered nurse;

In light of the aforementioned federal and state precedents, and the great need to deploy competent unlicensed allied health professionals to supplement the current licensed allied health workforce in administering COVID-19 vaccinations, the American Association of Medical Assistants and the Connecticut Society of Medical Assistants urge you to issue an executive order permitting medical assistants to administer COVID-19 vaccinations under the authority of licensed providers such as physicians (MDs/DOs), nurse practitioners, physician assistants, and pharmacists.

Thank you for your consideration, Governor Lamont. Feel free to direct questions to me at dbalasa@aama-ntl.org and 800/228-2262.

Very truly yours,



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American Association of Medical Assistants