



April 5, 2021

PREP Act Authorization Explainer and Frequently Asked Questions

On April 5, 2021, the Director of the Oregon Health Authority (OHA) [issued an Amended Authorization under the federal PREP Act](#), that expands who can administer COVID-19 FDA authorized or approved vaccines, subject to certain requirements. The goals of the Authorization and the Amended Authorization are to expand the vaccinator workforce, while ensuring that vaccine administration is done safely, and to provide liability protection for those who are engaged in the state's COVID-19 vaccination efforts.

This “explainer” and the FAQs provide additional information regarding the intent of the Authorization and how it should be interpreted and implemented.

Definitions:

- **“CDC”** means the U.S. Centers for Disease Control and Prevention.
- **“CPR”** means cardiopulmonary resuscitation.
- **“FDA”** means the U.S. Food and Drug Administration.
- **“HHS”** means the U.S. Department of Health and Human Services.
- **“PREP Act”** means the federal Public Readiness and Emergency Preparedness Act, 42 U.S.C. 247d–6d.
- **“SERV-OR”** is OHA’s State Emergency Registry of Volunteers.

Application of the PREP Act Authorization to Health Professionals Currently Licensed and Authorized to Vaccinate in Oregon

OHA’s PREP Act Authorization is not intended to change anything or add additional requirements for currently licensed health professionals who can vaccinate under Oregon law. The list of vaccinators who are authorized to vaccinate under Oregon law can be found here:

<https://www.oregon.gov/oha/PH/PREPAREDNESS/SERV-OR/Pages/MRC%20Resources/Vaccinator%20categories%20Final.pdf>.

If a health professional is authorized to vaccinate under Oregon law, but the professional's licensing board has certain requirements, the professional must still meet those requirements. For example, dentists have the authority to vaccinate, but must comply with the Board of Dentistry's training requirements. Pharmacists have the authority to vaccinate but must meet the Board of Pharmacy's training requirements.

Application of the PREP Act Authorization to Health Professionals Currently Licensed in Another State and Vaccinating in Oregon

On February 2, 2021, HHS issued an amendment to the PREP Act that permitted any health care provider licensed in any state who is permitted to vaccinate, to administer COVID-19 vaccinations in any state.¹ Thus, those individuals licensed and authorized to vaccinate in any state, can administer COVID-19 vaccinations in Oregon without having to comply with any of the requirements in Oregon's Amended PREP Act Authorization.

Application of the PREP Act Authorization to Previously Licensed, Certified or Registered Health Professionals

Individuals who were, within the last five (5) years, licensed, certified or registered in Oregon **or in another state**, in any of the categories listed in the Authorization, can administer FDA authorized or approved COVID-19 vaccines, if they can meet the following requirements:

- Have documentation they were in good standing with their licensing, certifying, or registering entity at the time the license, certification or registration expired or was otherwise surrendered.
- Have documentation of successful completion of the CDC COVID-19 Vaccine Training (<https://www.cdc.gov/vaccines/covid-19/training.html>) or a similar training offered by an educational institution or health system.
- Show competence of vaccination skills by being observed for a period of time by a currently practicing health care professional experienced in administering intramuscular injections and have documentation of such observation and competence. See below for information related to this requirement.
- Have current certification in basic CPR. See below for information related to this requirement.

In addition, an individual who was previously licensed, certified or registered in any of the categories listed in the Authorization may only vaccinate at a location that has a currently practicing health care professional experienced in administering intramuscular injections on site to provide general monitoring and supervision. However, these previously licensed, certified or registered individuals do not need to vaccinate under a delegation or authorization from a licensed health provider.

¹ <https://www.govinfo.gov/content/pkg/FR-2021-02-02/pdf/2021-02174.pdf>.

Application of the PREP Act Authorization to Currently Licensed, Certified or Registered Individuals in Oregon, Who Cannot Vaccinate Under Oregon Law

Individuals who are licensed, certified, or registered in Oregon but who are not authorized to vaccinate humans under Oregon law, for example Certified Nursing Assistants (CNAs) and Veterinarians, can administer FDA authorized or approved COVID-19 vaccines, if they can meet the following requirements²:

- Have documentation they are in good standing with their licensing, certifying, or registering entity.
- Have documentation of successful completion of the CDC COVID-19 Vaccine Training (<https://www.cdc.gov/vaccines/covid-19/training.html>) or a similar training offered by an educational institution or health system. See below for information related to this requirement.
- Show competence of vaccination skills by being observed for a period of time by a currently practicing health care professional experienced in administering intramuscular injections and have documentation of such observation and competence. See below for information related to this requirement.
- Have current certification in basic CPR. See below for information related to this requirement.

Individuals who are licensed, certified, or registered in Oregon but who are not authorized to vaccinate humans under Oregon law may only vaccinate at a location that has a currently practicing health care professional experienced in administering intramuscular injections on site to provide general monitoring and supervision. However, these previously licensed, certified or registered individuals do not need to vaccinate under a delegation or authorization from a licensed health provider.

Application of the PREP Act Authorization to Healthcare Students

Healthcare students in the fields of study listed in the Authorization, can administer FDA authorized or approved COVID-19 vaccines, if they can meet the following requirements:

- Have documentation of successful completion of the CDC COVID-19 Vaccine Training (<https://www.cdc.gov/vaccines/covid-19/training.html>) or a similar training offered by an educational institution or health system. See below for information related to this requirement.
- Show competence of vaccination skills by being observed for a period of time by a currently practicing health care professional experienced in administering intramuscular

² This category includes phlebotomists even though there is not a state license, certification, or registration. Phlebotomists therefore, would not need to have documentation from a licensing, certification or registration entity of good standing.

injections and have documentation of such observation and competence. See below for information related to this requirement.

- Have current certification in basic CPR. See below for information related to this requirement.

Healthcare students may only vaccinate at a location that has a currently practicing health care professional experienced in administering intramuscular injections on site to provide general monitoring and supervision. However, healthcare students do not need to vaccinate under a delegation or authorization from a licensed health provider.

Application of the PREP Act Authorization to Pharmacists, Pharmacy Interns, Pharmacy Technicians and Pharmacy Students

In addition to any other requirements that are applicable above, pharmacists who do not currently vaccinate, pharmacy interns, pharmacy technicians and pharmacy students must complete a practical training program that is approved by the Accreditation Council for Pharmacy Education (ACPE).

CDC Vaccine Training, or Equivalent

The CDC Vaccine Training can be found here:

- https://www.cdc.gov/vaccines/covid-19/training-education/index.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fvaccines%2F%2F%2Ftraining.html.

In addition, Oregon Health and Science University (OHSU) has an online training that meets the requirements. To take that training go to:

- <https://www.ohsu.edu/school-of-medicine/cpd/covid-19-vaccination-training>.

You may want to periodically check [OHA's vaccine website](#) for information about additional trainings that are available.

CPR Certification

HHS included in its amended declaration dated February 4, 2020, that the requirement for certain qualified persons to have a current certificate in basic CPR is satisfied by, among other things, a certification in basic CPR by an online program that has received accreditation from the American Nurses Credentialing Center, the Accreditation Council for Pharmacy Education (ACPE), or the Accreditation Council for Continuing Medical Education.

The Red Cross also has online courses that would meet this requirement. To find a course go to:

- https://www.redcross.org/take-a-class/cpr?utm_source=RCO&utm_medium=For_Individuals_Find_Classes_and_Certification&utm_content=CPR.

Observation Requirement

Individuals who are not currently authorized to vaccinate under their scope of practice, must, in order to meet the PREP Act requirements, be observed for a period of time by a currently practicing health care professional experienced in administering intramuscular injections, who can confirm the individual has the skills necessary to safely administer COVID-19 vaccines. There is no minimum or maximum period of time that an individual must be observed, no specific training that must be undertaken where observation can occur, and no specific form for documenting the observation period.

OHA is working on identifying resources to assist individuals in meeting this observation requirement. If you work within a health care facility or a health system, you should ask your employer for assistance with this requirement.

Once the observation is complete the observing health care professional should provide the observed individual with documentation of the observation period that includes the observed individual's name, the date of the observation, what was observed, and the observing health care professional's name, type of license, license number, signature, and date. A template form that can be used, but is not required to be used, can be found [here](#).

OHA is not collecting this documentation, but the individual may be asked for it by a person operating a vaccination site, or by a licensing, registering, or certifying entity.

Vaccination Sites

Individuals who do not currently vaccinate as part of their health care practice (it's not within their scope), including those who are not currently licensed, certified, or registered, or who are healthcare students, can only administer COVID-19 vaccines at a site that has a currently practicing health care professional experienced in administering intramuscular injections on site to provide monitoring and supervision.

This monitoring and supervision requirement is not intended to mean that the experienced health care professional must watch every vaccination or that a vaccinator must be supervised at all times, but rather that the health care professional is generally keeping an eye on the vaccinations and is available in case any questions or issues arise.

Given that individuals who are vaccinated must be observed in case they have an adverse reaction, OHA presumes that sites will have medical professionals available to handle medical issues, and to provide the necessary monitoring and supervision.

Frequently Asked Questions

Q1. Who was eligible to administer vaccinations in Oregon before the expansion under the PREP act?

A1: Go to <https://www.oregon.gov/oha/PH/PREPAREDNESS/SERV-OR/Pages/MRC%20Resources/Vaccinator%20categories%20Final.pdf> to see a list of who is authorized, under Oregon law, to vaccinate.

Q2. Will COVID-19 vaccines be distributed to offices where these new vaccinators work, like dental offices, veterinary offices or optometrist offices or will these new vaccinators work at other locations like pharmacies and mass vaccination sites?

A2: It is unlikely that COVID-19 vaccines will be distributed to places like dental, veterinary or optometrist offices. In order to get a vaccine distribution you have to be an [enrolled provider](#) and meet many vaccine storage and handling requirements. However, individuals who meet the PREP Act requirements to vaccinate can offer their services at any location that is administering vaccinations, subject to the requirements of that site, and their need for additional vaccinators.

Q3. Do the newly eligible individuals need to complete a training in order to vaccinate?

A3: Yes. The information above lays out both the training and observation requirements.

Q4. Is OHA going to be maintaining a list of vaccinators who are qualified to administer COVID-19 vaccines under the PREP Act, who are available to vaccination sites?

A4: No, but OHA is exploring ways to connect trained and qualified vaccinators with vaccination sites that are in need of additional vaccinators. You may want to periodically check [OHA's vaccine website](#) for updates.

Q5. What if I am licensed in another state and am authorized to vaccinate, can I administer COVID-19 vaccinations in Oregon?

A5: Yes, under an amendment to the PREP Act issued by HHS and effective on February 2, 2021, healthcare providers who are licensed in a State can prescribe, dispense, and/or administer COVID-19 vaccines in any State or jurisdiction where the PREP Act applies. <https://www.govinfo.gov/content/pkg/FR-2021-02-02/pdf/2021-02174.pdf>.

Q6. What if I am registered as a volunteer with SERV-OR but am also on this expanded list of vaccinators?

A6: You would still have to meet the requirements in the amended Authorization if you aren't permitted within your scope of practice to vaccinate, or you could vaccinate under the authority of another health care provider's licensed, as authorized under state law.

Q7. If I'm on the Amended Authorization list, can I register with SERV-OR?

A7: If you are licensed, registered, or certified as a health care provider in Oregon, or were licensed, registered or certified as a health care provider in Oregon within the last 10 years, you are eligible to register with SERV-OR. For additional information about registering with SERV-OR, visit: <https://serv-or.org/>.

Resources:

- Amended OHA PREP Act Authorization
- PREP Act Requirements Checklist
- Observation documentation sample form
- [CDC Vaccine Training](#)

- [OHSU Vaccinator Training](#)
- [Red Cross CPR classes](#)
- [Healthcare professionals with Authority to vaccinate in Oregon](#)

Document accessibility: For individuals with disabilities or individuals who speak a language other than English, OHA can provide information in alternate formats such as translations, large print, or braille. Contact the Health Information Center at 1-971-673-2411, 711 TTY or COVID19.LanguageAccess@dhsosha.state.or.us