Dear Governor Cuomo:

New York State Pediatricians have been at the front lines of public health initiatives for many decades. It is a core tenet of pediatrics that universal immunization to vanquish vaccine preventable illness is critical to the delivery of health care not only to children, but to adults as well.

In our current situation, the urgent need for immunization services has never been greater. We have responded to outbreaks of communicable diseases, and have redoubled our continuing efforts to catch up needed childhood vaccines missed or delayed due to the SARS-CoV-2 pandemic. With new vaccines against this virus becoming an immediate reality, we stand ready to offer our infrastructure, our services and our experience in vaccine delivery to help immunize millions of New Yorkers of all ages.

However, our efforts to not only expand, but to even maintain our ability to provide standard of care childhood immunizations are hamstrung by the inability to hire adequate staff to respond to the increased need. NYS Public Health Law permits only licensed health care professionals to provide immunization services, and the current shortage of licensed nurses limits the ability of pediatricians to immunize all New Yorkers who wish to be immunized.

The vast majority of states, including our neighbors in New Jersey and Massachusetts, allow medical assistants to administer vaccines ordered by a physician or other healthcare provider, under the direct supervision of the prescriber, but this is not permitted in New York. Even pharmacists, with less hands-on patient-care training than medical assistants, may administer vaccines, without on-site supervision by a physician. This restrictive rule, along with the limited availability and high cost of nursing staff, has hampered the ability of Pediatricians to hire staff to administer vaccines. This has become alarmingly evident in the current crisis as we try to catch up children’s shots, maintain their immunization status, and consider being part of the effort to distribute soon to be released COVID 19 vaccines.

As representatives of 6,000 New York State pediatricians, and as authors of the 2010 and 2016 AAP National Guidelines on Immunizations, we write to request that, in the face of the current health care emergency, you issue an emergency Executive Order permitting medical assistants and other staff with appropriate training to administer vaccines to New Yorkers, following the order and under the supervision of a qualified healthcare provider.
As we face a rapidly growing need for immunization services, it is critical that pediatricians not be forced to limit access to these services due to lack of adequate staff. We urge you to expand the number of staff who can vaccinate our citizens, so that all may be immunized as expeditiously as possible.

Sincerely,

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