

**March 19, 2021**

### **Washington veterinarians and veterinary students as COVID-19 vaccine administrators**

Due to dedicated efforts by the AVMA, veterinarians and veterinary students are now authorized to administer COVID-19 vaccines to human patients in all 50 states under the [PREP Act](#). As the federal government anticipates significantly ramping up vaccine allocation as more people become eligible, there is a need to have a cadre of authorized volunteers to assist with vaccine administration. The WSVMA has discussed this with the WA State Dept. of Health (DOH) and the following information is provided.

Veterinarians (both with active and lapsed licenses) and veterinary students are authorized under the federal PREP Act to administer COVID-19 vaccines as long as they fulfill all of the following requirements:

1. The vaccine must be authorized, approved, or licensed by the FDA. This includes the Pfizer, Moderna, and Janssen/Johnson & Johnson COVID-19 vaccines that have received emergency use authorization from the FDA;
2. Vaccination must be ordered and administered according to the Advisory Committee on Immunization Practices (ACIP) COVID-19 vaccine recommendation(s);
3. Veterinarians and veterinary students must have documentation of completion of the [CDC COVID-19 Vaccine Training Modules](#) and, if applicable, such additional training as may be required by the State, territory, locality, or Tribal area in which they are prescribing, dispensing, or administering COVID-19 vaccines. See the [CDC COVID-19 Vaccine Training Modules](#). The State of Washington is not requiring additional training at this time;
4. Veterinarians and veterinary students must have documentation of an observation period by a currently practicing healthcare professional experienced in administering intramuscular injections, and for whom administering vaccinations is in their ordinary scope of practice, who confirms competency of the healthcare provider or student in preparation and administration of the COVID-19 vaccine(s) to be administered and, if applicable, such additional training as may be required by the State, territory, locality, or Tribal area in which they are prescribing, dispensing, or administering COVID-19 vaccines. Note: The healthcare professional or student is not required to submit this documentation to DOH or any other agency or individual. Such documentation should be maintained in the healthcare professional's or student's personal possession;
5. Veterinarians and veterinary students must have a current certificate in basic cardiopulmonary resuscitation. This requirement is satisfied by, among other things, a certification in basic cardiopulmonary resuscitation by an online program that has received accreditation from the American Nurses Credentialing Center, the ACPE, or the Accreditation Council for Continuing Medical Education;
6. Veterinarians and veterinary students must comply with recordkeeping and reporting requirements of the jurisdiction in which he or she administers vaccines, including informing the patient's primary-care provider when available, submitting the required immunization

information to the State or local immunization information system (vaccine registry), complying with requirements with respect to reporting adverse events, and complying with requirements whereby the person administering a vaccine must review the vaccine registry or other vaccination records prior to administering a vaccine. Note: If a veterinarian or veterinary student is only administering vaccines in support of another provider's or entity's vaccination program, then the latter is responsible for reporting this vaccination information; and

7. Veterinarians and veterinary students comply with any applicable requirements (or conditions of use) as set forth in the Centers for Disease Control and Prevention (CDC) COVID-19 vaccination provider agreement and any other federal requirements that apply to the administration of COVID-19 vaccine(s).

### **Inactive license holders**

Veterinarians who have held an active license or certification under the law of any State within the last five years, which is inactive, expired or lapsed so long as the license or certification was active and in good standing prior to the date it went inactive, expired or lapsed and was not revoked by the licensing authority, surrendered while under suspension, discipline or investigation by a licensing authority or surrendered following an arrest may also administer COVID-19 vaccines.

The intent is to include recently retired veterinarians who may want to help.

### **Veterinary students**

If you are a veterinary student, you must have appropriate training in administering vaccines as determined by your school or training program and supervision by a currently practicing healthcare professional experienced in administering intramuscular injections.

### **Liability**

Veterinarians and veterinary students will be afforded liability protections in accordance with the PREP Act and the terms of the amendment. However, specific conditions must be met in order for the authorization to administer the vaccines and the liability protections to apply. These liability protections apply from March 11, 2021, through October 1, 2024. In order for the authorization and liability protections to apply, veterinarians and veterinary students must be participating in association with a COVID vaccination effort by a state, local, tribal, or territorial authority, or by an institution in which the COVID vaccine is administered.

While the liability outlined in the PREP Act is broad, it does not apply to willful misconduct, and the federal government does not provide a legal defense in the event that you are sued. *Veterinary malpractice will not likely respond to claims arising from a veterinarian intentionally vaccinating people against COVID.*

### **Getting vaccinated**

Veterinary professionals are not yet authorized to be vaccinated in Washington. However, the WSVMA has been advised by Washington State Department of Health that veterinarians and veterinary students who volunteer to administer the vaccine will qualify to receive the vaccine.

## How do I sign up to be a vaccine administrator?

The first step for a potential volunteer is to register online at [waserv.org](http://waserv.org). See this [registration guide](#) for instructions (PDF). Applications will be screened to ensure the potential volunteer's health license is in good standing in each state they are licensed in. The Washington State Department of Health will activate approved volunteers as needs arise while an emergency proclamation is in effect. There are options to sign up as a volunteer for two (2) days or less per week. Or temporary work assignment is also available.

Visit the DOH page [Emergency Volunteer Health Practitioners](#) for complete information and frequently asked questions.

### Resources

- [Health Care Providers Who May Administer COVID-19 Vaccines in Washington State Based on State Law and Federal Guidance](#)
- [WA State COVID-19 Volunteer Vaccine Administrator Information and Resource Page](#)
- [Washington State Department of Health List of Providers Authorized to Administer Vaccines](#)
- [WA Vaccine Phase Finder](#)
- [Find COVID-19 Vaccine Appointments](#)
- [Fact sheet: Expanding the COVID-19 Vaccination Workforce](#)
- [Information on the federal PREP Act and COVID](#)
- [Amendment to the declaration that includes veterinarians](#)