



Via electronic submission: Judith.Persichilli@doh.nj.gov

December 17, 2020

The Honorable Judith Persichilli
Commissioner
State of New Jersey
Department of Health
Trenton, NJ

RE: Permission for Paramedics to Administer COVID-19 Vaccine

Dear Commissioner Persichilli,

On behalf of New Jersey's hospitals and health systems, the New Jersey Hospital Association is writing to request that you exercise your authority under N.J.A.C. 8:41-1.4 to grant a waiver, allowing certified mobile intensive care paramedics to administer COVID-19 vaccine. Your Executive Directive No. 20-002 authorizes certified mobile intensive care paramedics in the hospital setting to perform functions and duties within their scope of practice to enhance and supplement their existing medical staff. In accordance with N.J.A.C. 8:41A-2.6, New Jersey's mobile intensive care paramedics, as a precursor to certification, must:

- 2. Demonstrate medication administration by the intramuscular, subcutaneous, sublingual, topical, intraosseous and IV routes. Utilization of appropriate medication administration equipment and the correct drug calculations are required. The student shall document all medication administrations performed on the patient's chart, as per hospital policy and on the appropriate clinical sign off sheet. Only those medications identified at N.J.A.C. 8:41-6.1 shall be administered;*
- 3. Identify the actions, indications, normal dosage range, side effects and contraindications of all medications administered;*
- 4. Submit one case study from each patient care area. This shall include the chief complaint, patient history, past medical history, current medications, clinical presentation, treatment modalities, response to care and patient outcome;*
- 5. Prepare a minimum of 10 medication cards on medications other than those approved for utilization by EMTs-Paramedic, as set forth at N.J.A.C. 8:41- 6.1, and which were identified during the student's critical care experience. Each card shall include the generic and trade names, actions, indications, contraindications, dosage range, routes of administration and adverse reactions;*

Pursuant to N.J.A.C. 8:41-6.1, New Jersey's certified mobile intensive care paramedicine scope of practice includes the administration of listed medications and therapeutic agents. We request that you expand the listed medications to include COVID-19 vaccinations during this public health emergency and temporarily permit certified mobile intensive care paramedics to administer COVID-19 vaccine, following training

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for the appropriate handling, administration, and documentation of the COVID-19 vaccine and observed side effects.

This would be of substantial assistance as hospitals and health systems provide vaccine to their pods. NJHA believes that by virtue of their training and experience, paramedics are appropriate health care professionals to administer COVID-19 vaccine.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cathleen D. Bennett', with a stylized, cursive script.

Cathleen D. Bennett
President & CEO

cc: Terry Clancy, PhD, RN, NRP
Director, Office of Emergency Medical Services
Terry.clancy@doh.nj.gov