



APTA Practice Advisory: Vaccine Administration

March 18, 2021

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The Issue: As of March 18, 2021, three COVID-19 vaccines have been approved by the U.S. Food and Drug Administration. These include the two-dose vaccines by [Pfizer-BioNTech](#) and [Moderna](#) and the one-dose vaccine by [Johnson & Johnson](#). The Biden Administration is increasing vaccine supplies from all three drug companies and anticipates enough vaccine supply for every adult in America by the end of May. The increased vaccine supply will require a greater supply of health care providers to administer it. Physical therapists and physical therapist assistants in some states are permitted to administer the COVID-19 vaccine after completing certain requirements.

What you need to know: Vaccine distribution and administration is coordinated at the state level. To find out if you are eligible to administer the COVID-19 vaccine in your state you must first determine if an executive order issued by your state governor permits health professionals who do not normally vaccinate as part of their scope of practice to do so during the public health emergency. You must also complete mandatory training, as vaccine administration is not included in the professional scope of physical therapist practice.

New CPT codes have been created that streamline the reporting of administration of the COVID-19 vaccine. For more information on these codes, visit the American Medical Association [COVID-19 CPT vaccine and immunization codes site](#). Although the codes are available, that doesn't mean all payers will reimburse for the service when billed by a physical therapist or physical therapist assistant. APTA recommends checking the payer policy before you code and bill for administering the vaccine.

Suggested Next Steps: This advisory provides a snapshot in time of the states currently permitting PTs to administer vaccines. Review this advisory and list of additional resources on PTs and PTAs providing COVID-19 vaccinations. Note that a governor's orders or department of health statements may not specifically indicate PTs or PTAs as health care providers permitted to administer the COVID-19 vaccine, but they may include them under more broad headings such as "licensed health providers." Regardless of your state's stance on PTs and PTAs administering the COVID-19 vaccine, whether you do so depends on your [personal scope of practice](#) and level of comfort in performing such a technique. If you want to help in the vaccine administration efforts but are not interested in administering an injection, you can still become involved by volunteering at a vaccine site in your community in a nonclinical capacity by assisting with patient intake forms or other nonclinical tasks.

About APTA Practice Advisories

APTA issues practice advisories to assist the physical therapy community in providing quality care that follows best available evidence and practice management principles. Practice advisories are not formal association guidelines, policies, positions, procedures, or standards. They are not clinical practice guidelines and do not establish a standard of care.

Physical therapists, physical therapist assistants, and students of physical therapy are responsible for clinical practice that is consistent with their scope of practice, and for complying with licensure laws and other regulations, all of which vary by state. The information provided is not meant as a substitute for legal or professional advice on any subject matter. Practice advisories may be updated after their original publication.

If your state does not currently allow you to administer the COVID-19 vaccine, and there is interest within your chapter to do so, APTA suggests you and your chapter contact your state health department or your physical therapy licensure board to advocate for allowing PTs and PTAs to be COVID-19 vaccinators.

States Permitting PTs and PTAs To Administer the COVID-19 Vaccine

As of March 18, 2021, APTA's government affairs team has gathered the following information on states permitting COVID-19 vaccine administration by PTs and PTAs. [Seek further information related to your state's vaccination workforce here.](#)

If your state does not allow or need you to be a COVID-19 vaccinator and you want to become a vaccinator in another state, contact that state's physical therapy licensure board to see if they are able to waive their licensure requirements. You may also consider obtaining [Physical Therapy Compact privileges](#). . To obtain compact privileges, your home state and the state you want to practice in must be part of the compact.

California

It is the California Physical Therapy Association's understanding, based on a response from the Physical Therapy Licensing Board of California, that PTs could render vaccinations if adequately trained. Serving as a vaccinator is a medical technique that a non-licensed person could be trained to do. Providing vaccinations would not be considered a physical therapist service, and PTs would be considered laypersons, akin to medical assistants, when serving in this capacity. Interested physical therapists must be affiliated with a supervising physician, podiatrist, or entity that is currently licensed to possess and administer vaccines.

According to the licensing board, "When an activity does not require [a license] and may be performed by any trained non-licensed person, a physical therapist may also perform that activity without obtaining an additional license or certification. In other words, the scope of practice described in Section 2620 does not prohibit a physical therapist from performing related functions for which no license or certification is required."

It is important to note that any practitioner should be properly trained before performing a medical procedure and should only act within their own knowledge, skills, and abilities. The [California Department of Public Health](#) has created a call center for providers to contact to [learn more about the COVID-19 vaccination administration program](#).

Colorado

The [Colorado Department of Public Health and Environment](#) invites interested providers to [enroll in the state's CDC COVID-19 Vaccination Program](#). They must have another provider associated with their facility who is already licensed to possess and administer vaccines. Their license must be in good standing with the Colorado Department of Regulatory Agencies and unexpired. In addition, they must have adequate storage facilities for the vaccine, complete the CDC COVID-19 Vaccine Provider Profile, and complete a compliance site visit from the Colorado Department of Public Health and Environment.

Maryland

[An order issued by the Maryland Department of Health](#) on Jan. 1, 2021, permits any health care practitioners who are licensed, certified, or registered under the provisions of the Health Occupations Article and whose scope of practice does not include the administration of vaccines to do so provided that:

1. They have successfully completed training on the administration of COVID-19 vaccines;
2. They have been determined by qualified supervisory personnel at the vaccination site to be able to administer the vaccines under appropriate supervision; and
3. They administer the vaccine at the vaccination site under appropriate supervision.

New Jersey

A [New Jersey Administrative Order](#) issued by the Division of Consumer Affairs on Feb.19, 2021, expressly permits physical therapists to administer vaccines if they receive training by a physician, registered professional nurse, advanced practice nurse, physician assistant, or pharmacist proficient in reconstitution and drawing of medications in a manner consistent with the CDC's "COVID-19 Vaccination Training Programs and Reference Materials for Healthcare Professionals" and the FDA's COVID-19 vaccination guidance.

Utah

Utah's "Utah Responds" program solicited volunteer health care workers, including physical therapists and physical therapist assistants, to register and become certified COVID-19 vaccinators. The program has stopped accepting volunteers, as the state had an overwhelming response and now has more than enough people to administer the vaccine.

Virginia

The [Virginia General Assembly passed legislation in Feb. 15, 2021](#), permitting any eligible health care provider licensed by a regulatory board in the Department of Health Professions, including physical therapists, to administer COVID-19 vaccines during the declared state of emergency related to the pandemic. Eligible health care providers interested in volunteering must register with the Virginia Department of Health or their local health department.

APTA Is Here to Help

Reach out to APTA at advocacy@apta.org with questions. Additional sources of information include:

- State government websites.
- [State department of health websites](#).
- [APTA state chapter websites](#).
- Regulatory boards and licensing agencies.
- Liability insurance carriers.
- [CDC COVID-19 vaccine administration training](#).
- [CDC guidance for individuals who have received the vaccine](#).
- [APTA's Coronavirus Resources](#).

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Contact: advocacy@apta.org