



August 5, 2022

Robert Fenton, White House National Monkeypox Response Coordinator
Demetre Daskalakis, MD White House National Monkeypox Response Deputy Coordinator
Meg Sullivan, MD, MPH, Chief Medical Officer, Administration for Strategic Preparedness and Response (ASPR)
U.S. Department of Health and Human Services
200 Independence Ave., Washington, DC 20201

RE: Request to amend the declaration of a Monkeypox Public Health Emergency to identify pharmacists, pharmacy students and pharmacy technicians as qualified persons covered under the PREP Act

Dear Mr. Fenton and Drs. Daskalakis and Sullivan.

This week, HHS Secretary Xavier Becerra announced that the Biden Administration [declared](#) a [public health emergency \(PHE\) for the monkeypox outbreak](#) in the United States, which now counts more infections from the virus than any other country—more than 7,102 [cases](#) nationwide.

Much as HHS took bold action in [declarations and amendments](#) under the Public Readiness and Emergency Preparedness Act (PREP Act) to authorize licensed pharmacists, pharmacy students and pharmacy technicians to provide COVID-19 vaccinations, testing and treatment (therapeutics) and childhood vaccinations (ages 3 and above), regardless of state laws and regulations, APhA requests HHS now take similar action to activate all our nation's pharmacists to help stop the rapid spread of Monkeypox.

While many states allow pharmacists the authority to administer the Monkeypox vaccines, 12 states and the District of Columbia lack clear authority or have barriers for pharmacists to administer the Monkeypox vaccines.

During the COVID-19 pandemic, pharmacists have been on the front lines every day serving our patients as healthcare professionals deemed critical to societal continuity. Pharmacists are the most accessible health care providers with close to 90% of the U.S. population living within 5 miles of a pharmacy, and patients do not typically require an appointment to see their pharmacist.

From the beginning of the pandemic, pharmacists, student pharmacists, and pharmacy technicians have been heroic in their work, serving the needs of their communities and their patients despite unprecedented challenges. Since December 2020, community pharmacists and their teammates have administered more than 255 million COVID-19 vaccinations (45% of the national total), with even more COVID-19 vaccinations administered by pharmacists in other practice settings. We can provide the same access to care for Monkeypox vaccinations, testing and therapeutics.

Pharmacists continue to stand ready and able to help prevent the spread of Monkeypox. We look forward to receiving specific clarification or authorization from HHS that pharmacists can order and administer FDA authorized or approved Monkeypox vaccines, testing and therapeutics under the PREP Act. To avoid misunderstandings by state and local regulators and resulting delays, we ask HHS to specify that its declaration under the PREP Act preempts any state or local requirement that prohibits or effectively prohibits a pharmacist from ordering and administering a Monkeypox vaccine, test or therapeutic the FDA has authorized or approved. Please contact Michael Baxter, Senior Director, Regulatory Policy at mbaxter@aphanet.org to inform us of HHS' action so that we can quickly disseminate it to our nation's pharmacists.

Sincerely,



Ilisa BG Bernstein, PharmD, JD, FAPhA
Interim Executive Vice President and CEO

cc: Samuel R. Bagenstos, JD, HHS General Counsel