



February 10, 2021

Governor Charlie Baker

Dear Governor Baker,

We are writing on behalf of the American Physical Therapy Association of Massachusetts (APTAMA), the Massachusetts Association for Occupational Therapy (MAOT) and the Athletic Trainers of Massachusetts (ATOM) in response to the Public Health Emergency created by COVID 19. Collectively, we represent the allied health care professions in Massachusetts who are licensed by the Division of Professional Licensure's Board of Allied Health Professions (BOAHP). This crisis has brought about inconceivable strain on the healthcare infrastructure, practitioners, and the community at large. The Executive Orders that have been put in place have eased the burden on many areas of the system to allow healthcare providers the opportunity to serve the public in a variety of capacities.

As the vaccination process moves forward and more groups become eligible to receive the vaccine, we will once again see a strain on the healthcare system. Physical therapists (PT), occupational therapists (OT), and athletic trainers (AT) all possess the necessary foundational knowledge to be able to assist in the provision of vaccines. PT/OT/AT are employed in significant numbers in many school/college, outpatient, hospital and homecare settings. We could be of great value to every community in the Commonwealth as more and more people look to become vaccinated.

This precedent has been set in other states in the US to meet the demands. Colorado has temporarily expanded the scope of healthcare providers across the board as one example (Emergency Rule can be found [here](#)). While AT is not clearly listed in the CO example there is precedence for inclusion of ATs as seen [here](#). Utilizing the language set forth by CO, below is a sample of how the language could be structured.

- Direct the expansion of the workforce of trained medical personnel available to administer the coronavirus disease 2019 (COVID-19) vaccinations within inpatient facilities and outpatient settings due to the coronavirus disease 2019 (COVID-19) pandemic
  - o Expanded Scope of Practice In Order to Administer the COVID-19 Vaccination.

- 1. Physical therapists/physical therapist assistants, occupational therapist/occupational therapy assistants, and athletic trainers may administer the COVID-19 vaccination while working in a hospital, inpatient or outpatient care facility, long-term care facility and/or school-based health service settings as delegated by physicians, physician assistants, advanced practice registered nurses, certified registered nurse anesthetists, or professional nurses.
- 2. Physical therapists/physical therapist assistants, occupational therapist/occupational therapy assistants, and athletic trainers are authorized to perform this delegated service upon adequate cross-training
- 3. Physical therapists/physical therapist assistants, occupational therapist/occupational therapy assistants, and athletic trainers shall not perform this delegated service if the licensee does not possess the knowledge, skill or training to perform.

Our expertise can support the health of the Commonwealth in a variety of forms during the public health crisis. In this instance we would be expanding the scope to allow for the ability to assist in the vaccination process. In addition further guidance would be beneficial as it relates to relevant liability protections and waivers for healthcare professionals.

Thank you for your consideration in this unprecedented time. Under your leadership Massachusetts has led the way in its responsiveness to this crisis. These individuals are highly educated and can contribute to the overburdened healthcare workforce. We hope you will consider the expanded roles that PT/OT/AT can fill as necessary. On behalf the membership of the APTAMA, MAOT, and ATOM, thank you for your leadership in this time of need. We appreciate your time and efforts.

Sincerely,



Eric Folmar, PT, DPT, OCS  
President, APTAMA



Brett Winston, PhD, LAT, ATC  
President, ATOM



Karen J. Hefler, OT, OTR  
President, MAOT

Cc: Karyn Polito, Lieutenant Governor  
MaryLou Sudders, Secretary of Health and Human Services  
Monica Bharel MD, MPH, Commissioner of the Massachusetts Department of Public Health  
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