

From: [Kathy Arney](#)
To: ["Johnston, Lisa B"](#)
Cc: [Kathy Arney](#)
Subject: RE: Vaccine Administration
Date: Thursday, March 11, 2021 12:45:52 PM
Attachments: [image001.png](#)

Lisa,

In response to your emailed question to the NC Board of PT Examiners, the Board addressed your questions at its meeting March 11, 2021.

1. Does the Governor's order 193 extend to PT students who are under the on-site supervision of licensed PTs?
2. As the Board considers action on this issue, will they consider providing additional guidance about student participation in vaccine administration provided they are working under the supervision of licensed PTs?

The Board affirmed that performing vaccinations is not in the PT Scope of Practice, thus a licensee is not performing physical therapy and should not imply to a client that they are receiving physical therapy services if they are performing vaccinations. Because vaccinations are not considered in the scope of PT practice, there are no regulations for the Board to modify or waive related to individuals who may perform vaccinations. Specifically, to address the questions regarding students, students are not licensees, thus they would need to obtain the appropriate training, become competent to perform vaccinations and follow all applicable state laws in the same way that PT licensees would do so.

The Board guidance, which will be posted on the Board website, www.ncptboard.org, will state:

"In response to emailed questions to the NC Board of PT Examiners, giving vaccinations would not be considered within the scope of PT practice; however, it will not be considered a violation of the NC PT Practice Act or Board rules for a PT licensee to perform vaccinations if they have the proper education, training, are competent to do so and it is safe for the recipient. In addition the licensee should follow all other applicable state laws regarding providing vaccinations. If a PT licensee is performing vaccinations they would not be called PT, nor is a PT license being used when providing the vaccination. A licensee should therefore avoid creating the perception that what they are doing is physical therapy."

The Board has been made aware of these potential training resources as follows:

- NC AHEC - NC AHEC Program vaccine module for volunteers is live and free: <https://www.charlotteahec.org/continuing-professional-development/event.cfm?eventid=65572> There is a certificate at the end that learners can print as proof that they have taken the course.
- NCDHHS - https://files.nc.gov/covid/documents/COVID-Immunization/12.10.20_cvms_orientation_training.pdf

- Obtain training under a supervising MD who will be onsite during vaccination performance and provide supervision.

The Board also encourages licensee to seek other volunteer options to help support the vaccination effort and slowing the spread of COVID-19:

- Resource recommended by NCBON - a person can register through "TERMS" – Training Exercise Response Management System - then receive the additional training needed. Link: <https://terms.ncem.org/TRS/>
- Individuals may seek training and opportunities to volunteer through their employers and local health departments.

I hope this information is helpful. Please don't hesitate to contact me if you have additional questions.

Kathy

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From: Kathy Arney
Sent: Thursday, February 25, 2021 10:50 AM
To: 'Johnston, Lisa B' <lisa_johnston@med.unc.edu>
Cc: Kathy Arney <karney@ncptboard.org>
Subject: RE: Vaccine Administration

Lisa,

In follow up to your questions below: these will also be considered at the Board meeting. Based on the current Board statement it is not PT, which requires a license; students are not licensees; however, an individual should possess the training and competence to perform the activity.

Training and competence are key to any individual who might perform this activity. Giving shots is not in the PT curriculum currently, thus additional training from another source would be required.

Kathy

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From: Johnston, Lisa B <lisa_johnston@med.unc.edu>
Sent: Thursday, February 25, 2021 10:40 AM
To: Kathy Arney <karney@ncptboard.org>
Subject: RE: Vaccine Administration

Kathy:

Thank you so much. This is very helpful. I do have a couple follow-up questions as well. This statement relates to licensed PTs.

1. Does the Governor's order 193 extend to PT students who are under the on-site supervision of licensed PTs?
2. As the Board considers action on this issue, will they consider providing additional guidance about student participation in vaccine administration provided they are working under the supervision of licensed PTs?

Much appreciated!

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From: Kathy Arney <karney@ncptboard.org>
Sent: Thursday, February 25, 2021 10:27 AM

To: Johnston, Lisa B <lisa_johnston@med.unc.edu>

Cc: Kathy Arney <karney@ncptboard.org>

Subject: RE: Vaccine Administration

Good Morning Lisa,

In response to your emailed question to the NC Board of PT Examiners, Governor Cooper's Executive Order 193, provides the regulatory flexibility needed for the Board to consider PT licensees performing vaccinations and the required education/training and competence to perform them. This topic will be addressed at the Board meeting March 10, 2021 and any decisions or guidance the Board can offer will be posted on the Board website at minimum. Until that time, this Board has provided this statement to those asking the question:

In response to your emailed question to the NC Board of PT Examiners, giving vaccinations would **not** be considered within the scope of PT practice; however, if a PT licensee is trained and competent to do so and it is safe for the client, it would not be a violation to do so. It would not be called PT, nor is a PT license being used when providing the vaccination so referring to yourself as a PT would not be done.

I hope this is helpful to you.

Kathy

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From: Johnston, Lisa B <lisa_johnston@med.unc.edu>

Sent: Thursday, February 25, 2021 10:17 AM

To: Kathy Arney <karney@ncptboard.org>

Subject: Vaccine Administration

Kathy:

I just saw the FSBPT updates and saw that a couple states have approved PTs to be vaccinators. I have been wondering if there would be movement in this direction. I am wondering if NC is considering this as well. This is purely personal interest, but I do think PTs are well positioned to be able to assist in the COVID vaccine efforts and would support consideration of this particularly with mandatory competency based training required.

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