

NEW JERSEY ASSOCIATION OF COUNTIES

County Government with a Unified Voice!

MARIE HAYES
NJAC President
Cape May County Freeholder

JOHN G. DONNADIO
Executive Director

December 21, 2020

Honorable Phil Murphy
Governor of the State of New Jersey
Office of the Governor
P.O. Box 001
Trenton, New Jersey 08625

RE: COVID-19 VACCINE DISTRIBUTION

Dear Governor Murphy:

As a follow up to our December 8, 2020 letter concerning "COVID-19 Vaccine Distribution" and subsequent meetings with county officials, the New Jersey Association of Counties (NJAC) respectfully submits the following additional recommendations on behalf of our elected officials, administrators, health officers, emergency management coordinators, purchasing agents, and other county stakeholders.

1. **COMMUNICATION:** As summarized in our December 8, 2020 letter, NJAC again recommends hosting weekly strategy sessions by video conference to discuss challenges, coordinate resources, and develop best practices with designated decision makers from each of the following county and State associations, departments, divisions, or other: NJAC, the New Jersey Association of County Administrators (NACA); the New Jersey LINC'S Health Officers Association (NJLHOA); the County Office of Emergency Management Coordinators Association of New Jersey (COEM); the New Jersey Association of County Purchasing Officials (NJACPO); other county stakeholders to be determined; the New Jersey Department of Health (DOH); the New Jersey Division of Local Government Services (DLGS); the New Jersey Division of Purchase and Property (DPP); the State Office of Emergency Management (OEM); the New Jersey Office of Information Technology; and the New Jersey Hospital Association (NJHA).
2. **INSURANCE BILLING, SCHEDULING, & RECORD KEEPING:** Although it appears that the proposed New Jersey Vaccine Scheduling System (NJVSS) will address the concerns with insurance billing, appointment scheduling, and record keeping as outlined in our December 8, 2020 letter, NJAC recommends having the New Jersey Department of Health (DOH) provide county officials with a timely and

comprehensive overview of when the system will be operational; its overall capabilities and functionality; whether the State of New Jersey will provide any resources, staff, or other to assist with data input and management; and, whether the State of New Jersey plans to develop a backup system or set of procedures in the event NJVSS fails for any period of time. NJAC further recommends making sure that NJVSS is a reservation-based system to ensure more accurate billing, scheduling, and record keeping. Importantly note that insurance billing for COVID-19 testing remains an issue for county governments across the State, which continue to struggle with the lack of responsiveness and delivery of insurance billing services as agreed upon by Vault Health.

3. **VACCINATORS:** In addition to our recommendations concerning the use of nursing students and qualified healthcare professionals to assist with administering the COVID-19 vaccine as outlined in our December 8, 2020 letter, NJAC recommends having the State of New Jersey expedite the process for authorizing duly licensed physicians, nurses, and qualified healthcare professionals from other States to assist with administering the COVID-19 vaccine. NJAC further recommends having the State of New Jersey provide a defense, indemnification, and hold harmless all vaccinators for any acts or omissions arising from administering the COVID-19 vaccine as protection for both volunteers and professionals who may be concerned about potential liability.
4. **CHAPTER 52 RELIEF:** NJAC recommends having the New Jersey Department of Health (DOH) waive, for the years 2020 and 2021, the evaluation and performance requirements stipulated under Title 8, Chapter 52, of the New Jersey Administrative Code concerning "Public Health Practice Standards of Performance Local Boards of Health" as local boards of health and local health agencies will reallocate their limited staff and resources to focus on vaccine distribution in addition to COVID-19 testing, contact tracing, and other related public health emergencies that may arise over the coming months.
5. **FUNDING:** As noted in our December 8, 2020 letter, NJAC recommends having the federal government and State of New Jersey make available critical financial resources to address the extraordinary expenses county governments will incur by administering a COVID-19 distribution plan, which include, but are not limited to: site designation, construction, and management; vaccine storage, distribution, and transportation; the purchase, storage, and distribution of additional personnel protective equipment (PPE); the hiring of public nurses and other healthcare professionals; the continued operation of COVID-19 test centers; the collection and sharing of public health data; and more.

I hope you find these recommendations helpful and look forward to hearing back from you with your thoughts and suggestions on how county governments may continue serving residents of the Garden State. Please note that for your convenience, our December 8, 2020 letter referenced throughout is also enclosed.

Very truly yours,

John G. Donnadio, Esq.
Executive Director

Encl: December 8, 2020 Letter

cc: Judith M. Persichilli, Commissioner, New Jersey Department of Health
Melanie Walter, Director, New Jersey Division of Local Government Services
Maurice Griffin, Acting Director, New Jersey Division of Purchase and Property
Glen Szenzenstein, Commander NJSP, New Jersey Office of Emergency Management
Christopher J. Rein, Chief Technology Officer, NJ Office of Information Technology
Mike Delamater, Deputy Chief of Staff, Intergovernmental Affairs & Public Engagement
Cathleen D. Bennett, President & CEO, New Jersey Hospital Association
Abe Antun, President, New Jersey Association of County Administrators
Les Jones, President, New Jersey LINC Health Officers Association
Brayden Fahey, President, County Office of Emergency Management Coordinators
David DeWoody, President, New Jersey Association of County Purchasing Officials

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RE: COVID-19 VACCINE DISTRIBUTION

Dear Governor Murphy:

As the State of New Jersey begins planning for the distribution of the COVID-19 vaccine, county governments across the State will play a vital role in its implementation, administration, and distribution. With this in mind, the New Jersey Association of Counties (NJAC) respectfully submits the following recommendations on behalf of our elected officials, administrators, health officers, emergency management coordinators, purchasing agents, and other county stakeholders with the singular purpose of helping to deploy an effective and efficient vaccination plan.

1. **COMMUNICATION:** NJAC recommends hosting weekly strategy sessions by video conference to discuss challenges, coordinate resources, and develop best practices with designated decision makers from each of the following county and State associations, departments, divisions, or other: NJAC, the New Jersey Association of County Administrators (NACA); the New Jersey LINCS Health Officers Association (NJLHOA); the County Office of Emergency Management Coordinators Association of New Jersey (COEM); the New Jersey Association of County Purchasing Officials (NJACPO); other county stakeholders to be determined; the New Jersey Department of Health (DOH); the New Jersey Division of Local Government Services (DLGS); the New Jersey Division of Purchase and Property (DPP); the State Office of Emergency Management (OEM); the New Jersey Office of Information Technology; and the New Jersey Hospital Association (NJHA).
2. **INSURANCE BILLING:** NJAC recommends having the State of New Jersey enter into an agreement through the Division of Purchase and Property (NJ DPP) with a medical billing service provider that would be made available to all county governments to use for benefits verification, claims submission, follow up on

outstanding and denied claims, record keeping, and all other relevant insurance billing services. Other than billing Medicare under certain circumstances, county governments as medical providers have no mechanism to bill insurance companies to recover the costs associated with administering the COVID-19 vaccine and continue to struggle with this very issue with COVID-19 testing.

3. **SCHEDULING & RECORD KEEPING:** NJAC recommends having the State of New Jersey enter into an agreement through the Division of Purchase and Property (NJDP) with a scheduling and record keeping provider or software that would be made available to county governments to use for scheduling, record keeping, and uploading patient information into the New Jersey Immunization Information System (NJIS). Although county governments have the ability to schedule COVID-19 vaccinations, and separately input patient data into NJIS, a seamless practice where all relevant patient information is entered on one occasion by clerical staff would save valuable time and resources.
4. **STORAGE OF VACCINE:** NJAC recommends having the State of New Jersey enter into an agreement through the Division of Purchase and Property (NJDP) with a dry ice manufacturer located in the State for the storage and transportation of the COVID-19 vaccine that would be made available to county governments to use accordingly. As often is the case where qualified purchasing agents at the county level serve as the lead agencies in cooperative purchasing agreements that save valuable property taxpayer dollars, having the State take the initiative in this manner may reduce costs through economies of scale and would certainly prevent county governments from competing against each other for the same services and resources.
5. **VACCINATORS:** NJAC recommends having the State of New Jersey authorize the use of nursing students and other qualified healthcare professional students to assist with administering the COVID-19 vaccine; and, after a date certain, make available a stipend for such volunteers, and already licensed and duly qualified healthcare practitioners, to address the long-term nature of distributing the COVID-19 vaccine. NJAC further recommends having the State of New Jersey request disaster medical assistance teams from other states less affected by COVID-19, and of which may be lower on the vaccination distribution priority list, assist with administering the COVID-19 vaccine.
6. **OPERATIONAL:** NJAC recommends having the State of New Jersey activate the New Jersey National Guard to assist county governments that may not have the necessary resources, facilities, capital, or other means necessary to carry out an effective COVID-19 vaccination plan. NJAC further recommends having all levels of government coordinate under incident management best practices such as the National Incident Management System framework, the Incident Command System, and the State's Emergency Management Process. Finally, NJAC

recommends having the State of New Jersey provide direction in a timely manner on the location of the regional mega COVID-19 vaccination sites so that county governments may incorporate into their vaccination plans accordingly.

7. FUNDING: NJAC recommends having the federal government and State of New Jersey make available critical financial resources to address the extraordinary expenses county governments will incur by administering a COVID-19 distribution plan, which include, but are not limited to: site designation, construction, and management; vaccine storage, distribution, and transportation if not addressed as noted above; the purchase, storage, and distribution of additional personnel protective equipment (PPE); the hiring of public nurses and other healthcare professionals if not addressed as noted above; the continued operation of COVID-19 test centers; the collection and sharing of public health data if not addressed as noted above; and more.

I hope you find these recommendations helpful and look forward to hearing back from you with your thoughts and suggestions on how county governments may continue serving residents of the Garden State. The New Jersey Association of Counties (NJAC) is committed to advocating for legislation, regulations, and policy directives that empower county governments to operate more effectively and efficiently. As a non-partisan organization that represents the only true regional form of government in the State with a unified and proactive voice, NJAC is committed to advancing innovative programs and initiatives that enhance the level of service provided and save valuable taxpayer dollars.

Very truly yours,

John G. Donnadio, Esq.
Executive Director

cc: Judith M. Persichilli, Commissioner, New Jersey Department of Health
Melanie Walter, Director, New Jersey Division of Local Government Services
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