



ARIZONA DEPARTMENT OF HEALTH SERVICES

March 26, 2021

Ms. Tammy Littrell
Acting Regional Administrator
Federal Emergency Management Agency
Sent via E-mail

Re: Federally Supported Mass Vaccination Site Offer

Greetings, Ms. Littrell,

Arizona recognizes and appreciates FEMA's willingness to provide a federally supported vaccination site in our state. As we have worked with our FEMA partners, we have continuously requested additional vaccine to support the unfilled capacity at our currently existing sites, often at the direction or request of FEMA leadership, but unfortunately, our requests continue to be denied. Our sites are a national model — sufficiently staffed and resourced, highly efficient, and have significant unfilled capacity to administer vaccine.

While we look forward to continuing our partnership with FEMA on the development of new COVID-19 response opportunities, the state does not need assistance in standing up additional fixed or mobile vaccination resources, and will instead continue to dedicate our limited resources to the state sites, rather than a FEMA-operated vaccination site.

While the primary reason for declining a FEMA-operated site is related to the state's significant available and unfilled capacity, there are many additional concerns voiced by states that host FEMA-operated sites. These include:

- Long wait times;
- Our initial discussion in which you stated the state would not have the ability to maintain medical control (that came directly from my conversation with you last week when I offered to have FEMA partner and provide vaccine at one of our sites, so I appreciate you clarifying the misunderstanding communicated by FEMA of how the sites are managed);
- Significant relationship challenges with FEMA due to FEMA staff that have been deployed to our rural counties and other states' sites that have poorly treated state, local, and healthcare partner staff, resulting in removal of FEMA staff and even required crisis counseling of state and county staff due to this treatment by FEMA employees; and
- Significant concerns about the impact on Arizona's vaccine allocation, as other states with FEMA-operated vaccination sites have indicated the allocation does not remain a federal allocation.

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However, while this doesn't address our current unmet capacity issues, we appreciate your recent commitment that the vaccine for a FEMA-operated site will not come from the existing state supply and that confirmation was put in writing.

As you are aware, Pima County has expressed interest in a FEMA-operated vaccination site. To accommodate your offer, and the County's interest, we are working to ensure they have delegated authority to independently partner with FEMA on a site if they deem it appropriate for their community so long as it does not result in a reduction of existing vaccine supply to the state or impact state vaccine resources and operations. This should include fulfillment by Pima County and the federal government to provide the resources required by FEMA of state or local jurisdictions in order to have a FEMA-operated vaccination site, including:

- On-site cold chain storage for the vaccine, including emergency backup power to the storage equipment to ensure continuous cold storage in the event of a power disruption;
- Pharmacy Operations Support;
- Appropriate county medical oversight to ensure compliance with state and county direction;
- A Vaccine Registration System, as the state will not be able to support onboarding of a FEMA-operated vaccination site onto the Arizona Vaccine Management System;
- Locally contracted communication lines and access (e.g., landline/cellphone and computer/internet);
- Wrap-around local support services for the site; and
- Site security at the vaccination site.

In addition, while not included in the list of requirements provided by your team, the site will need to comply with Arizona immunization reporting requirements, reporting all required vaccination data back to the Arizona State Immunization Information System within 24 hours of administration as required by [Governor Ducey's Executive Order 2021-01](#).

Based on our recent experience with Pima County, we have concerns about their ability to adequately support your site, given their inability to financially sustain other COVID-19 related public health activities they have chosen to undertake, and have since billed the state for unapproved costs. Given the dramatic financial constraints they claim to experience from these activities, we would like to get written assurance that Pima County and/or the federal government is able to appropriately fund the activities required to operate a FEMA site until reimbursement from FEMA is obtained. Given that state or county funds would need to be used to obtain reimbursement, federal immunization funding will not be approved to be used on this activity, as it will take away from other critical activities Pima County has already committed to providing. In

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addition, Pima County has been a frequent requestor of vaccination and administrative staff for currently existing vaccination sites. We are skeptical of their ability to provide the necessary resources and personnel and would need to confirm in writing their plan for providing resources for these activities without impacting the state resources currently in place at our existing Pima county site.

If these requirements are not able to be met or these concerns continue to persist, we will not be able to continue to delegate authority to Pima County for this activity. We remain ready, willing, and able to take the additional vaccine and administer it through our existing state sites. We have the capacity and the infrastructure to do so.

Sincerely,

A handwritten signature in black ink, reading "Cara M. Christ MD". The signature is fluid and cursive, with the letters "C", "M", and "C" being prominent. The "MD" is written in a smaller, more formal font at the end of the signature.

Cara M Christ, MD, MS
Director

Cc: Commander Matthew Johns, Regional Health Administrator, Region IX, Health and Human Services
Allen Clark, Director, Emergency Management Division, Arizona Department of Emergency and Military Affairs (DEMA)