

Authority to Immunize During COVID-19

Pharmacists, Pharmacy Technicians, Student Pharmacists and Interns

The U.S. Department of Health and Human Services (HHS) expanded vaccination authorities under the [Public Readiness and Emergency Preparedness \(PREP\) Act](#) for [pharmacists](#), [pharmacy technicians](#), [student pharmacists and interns](#), and [retired or inactive pharmacists and interns](#) nationwide during the public health emergency. To optimize these opportunities and increase access for the communities you serve, it is important to know what is expected and prepare for your expanded role as an immunizer.

	Pharmacists	Pharmacy Technicians	Student Pharmacists/Interns	Retired/Inactive Pharmacists and Pharmacy Interns
Who has authority to immunize during the COVID-19 emergency?				
Licensure Requirements	Active state license	Licensed or registered per state requirements; must have CPhT from PTCB or NHA if no state requirements	Licensed or registered per state requirements or if inactive/expired/lapsed in good standing within 5 years; must be authorized if no state requirements	Active license or certification within the last 5 years has expired or lapsed; in good standing*
Authority	Order and administer	Administer		See applicable column to the left
Supervision Requirements	None	A readily available qualified pharmacist	A trained health care professional	See applicable column to the left
Which vaccines can be provided?				
COVID-19 Vaccines	Authorized to provide FDA-authorized or FDA-licensed COVID-19 vaccines according to ACIP COVID-19 vaccine recommendations to patients 3 years or older			
Influenza Vaccines	Authorized to provide ACIP recommended seasonal influenza vaccines to adults 19 years or older according to ACIP's standard immunization schedule; Authorized to provide influenza vaccination to persons 3-18 years old according to ACIP's standard childhood immunization schedule (see below)			No PREP Act authority at this time
Childhood Immunizations	Authorized to provide vaccines to persons ages 3-18 years old according to ACIP's standard childhood immunization schedule			No PREP Act authority at this time

Continues.

Authority to Immunize During COVID-19 (continued)

Pharmacists, Pharmacy Technicians, Student Pharmacists and Interns

	Pharmacists	Pharmacy Technicians	Student Pharmacists/Interns	Retired/Inactive Pharmacists and Pharmacy Interns
What requirements need to be met to provide the above vaccines during the COVID-19 emergency?				
Training Requirements	Must complete the immunization training requirement in their state. If the licensing state does not specify training, an ACPE-approved practical training program of at least 20 hours is required and should include hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines. APhA's Certificate Training Program for Pharmacy-based Immunization Delivery meets this requirement.	Must complete an ACPE-approved practical training program that includes hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines. APhA's Certificate Training Program for Pharmacy-based Immunization Delivery meets this requirement.		Must provide documentation of completion of CDC's COVID-19 Vaccine Training Modules ; if applicable, must also complete training as required by the state. Must provide documentation of a period of observation by a health care professional— <ul style="list-style-type: none"> • Who is currently practicing • Who is experienced in administering I.M. injections • For whom administering I.M. injections is within their ordinary scope of practice • Who can confirm the individual observed is competent in the preparation and administration of the COVID-19 vaccines provided
Basic CPR Requirements	Must have a current certificate in basic CPR. An online basic CPR certification program accredited by ACPE, the American Nurses Credentialing Center, or the Accreditation Council for Continuing Medical Education satisfies this requirement.			

Continues.



Authority to Immunize During COVID-19 (continued)

Pharmacists, Pharmacy Technicians, Student Pharmacists and Interns

	Pharmacists	Pharmacy Technicians	Student Pharmacists/Interns	Retired/Inactive Pharmacists and Pharmacy Interns
What requirements need to be met to provide the above vaccines during the COVID-19 emergency?				
CPE Requirements	Must complete a minimum of 2 hours of ACPE-approved, immunization-related CE during each state licensing period. Access APhA's Education Library for Immunization CE .		Not applicable	None specified
Recordkeeping Requirements	Must comply with recordkeeping and reporting requirements of the jurisdiction in which he or she administers vaccines, including informing the patient's primary care provider when available and submitting the required immunization information to the state or local immunization information system (vaccine registry).	The supervising qualified pharmacist must comply with recordkeeping and reporting requirements as described to the left.	Same as pharmacists.	See applicable column to the left.
Well-Child Visit Requirements	If the patient is 18 years of age or younger, must inform the patient and the adult caregiver accompanying the patient of the importance of a well-child visit with a pediatrician or other licensed primary care provider, and refer patients as appropriate. Refer to the Well-Child Visit Brochure , Template Referral Form Well-Child Visit , and Well-Child Checkup Letter designed for pharmacy teams.			
Additional Requirements	Must comply with any applicable requirements (or conditions of use) as set forth in the CDC COVID-19 vaccination provider agreement and any other federal requirements that apply to the administration of COVID-19 vaccine(s).	The supervising qualified pharmacist must comply with vaccination provider agreement as described to the left.	Same as pharmacists.	See applicable column to the left.

Continues.



Authority to Immunize During COVID-19 (continued)

Pharmacists, Pharmacy Technicians, Student Pharmacists and Interns

***Good standing:** License or certification was neither revoked nor surrendered following an arrest; and the individuals must not appear on the Officer of the Inspector General's List of Excluded Individuals/Entities.

Abbreviations: CPhT – Certified Pharmacy Technician, PTCB – Pharmacy Technician Certification Board, NHA - National Healthcareer Association, FDA – Food and Drug Administration, ACIP – Advisory Committee on Immunization Practices, CE – Continuing Education, ACPE – Accreditation Council for Pharmacy Education

Note: HHS released an [amendment](#) to the PREP Act on December 3, 2020, that modifies and clarifies the pharmacist training requirement and the CPR requirement. For more information, view the [Continuing Pharmacy Education Provider e-Update](#) from the Accreditation Council for Pharmacy Education (ACPE). HHS released another [amendment](#) on March 11, 2021, to clarify that student pharmacists and interns can be supervised by a health care professional who has appropriate training in administering vaccines to administer COVID-19 vaccines. The table above reflects these requirements as amended.

Disclaimer: Information related to the COVID-19 pandemic is changing rapidly and continuously. The material and information contained in this publication is believed to be current as of the date included on this document. The American Pharmacists Association assumes no responsibility for the accuracy, timeliness, errors or omission contained herein. Links to any sources do not constitute any endorsement of, validity, or warranty of the information contained on any site. The user of these materials should not under any circumstances solely rely on, or act based on this publication. Pharmacy professionals retain the responsibility for using their own professional judgment and practicing in accordance with all rules, regulations, and laws governing the pharmacy practice within their jurisdiction.