

Authority to Immunize During COVID-19

Pharmacists, Pharmacy Technicians, and Pharmacy Interns

The U.S. Department of Health and Human Services (HHS) recently expanded [COVID-19](#) and [childhood](#) vaccine authority under the Public Readiness and Emergency Preparedness (PREP) Act for pharmacists, [pharmacy interns, and technicians](#) nationwide during the public health emergency. To optimize these opportunities and increase access for the communities you serve, it's important to know what's expected and prepare for your expanded role as an immunizer. **The most important thing you can do right now is review the requirements and ensure you meet the requirements.**

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. The table below reflects these requirements as amended. For more information, view the [Continuing Pharmacy Education Provider e-Update](#) from the Accreditation Council for Pharmacy Education (ACPE).

Requirement	COVID-19 Vaccinations	Childhood Vaccinations
Who Is Authorized?	<ul style="list-style-type: none"> State-licensed pharmacists to order and administer State-authorized pharmacy interns (“intern”)* acting under the supervision of a readily available, qualified pharmacist to administer Qualified pharmacy technicians (“technicians”)* acting under the supervision of a readily available qualified pharmacist to administer 	
Age Requirements	3 years or older	3–18 years old
Vaccine Requirements	FDA-authorized or FDA-licensed	FDA-authorized or FDA-licensed
ACIP Guidelines/ Recommendations	COVID-19 vaccine recommendations	Standard Immunization schedules
Pharmacist Training Requirement	The pharmacist 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. Resources: APhA’s Certificate Training Program for Pharmacy-based Immunization Delivery meets this requirement.	
Pharmacy Intern and Technician Training Requirement	The intern and technician 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. For training inquiries, please reach out to education@aphanet.org .	
Basic Cardiopulmonary Resuscitation Requirement	The pharmacist, intern, and technician must have a current certificate in basic cardiopulmonary resuscitation. (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).	

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Authority to Immunize During COVID-19 (continued)



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Requirement	COVID-19 Vaccinations	Childhood Vaccinations
CPE Requirement	The pharmacist and technician must complete a minimum of 2 hours of ACPE-approved, immunization-related continuing pharmacy education during each state licensing period. Resources: Access APhA's Education Library for Immunization CPE.	
Recordkeeping Requirement	The pharmacist must comply with recordkeeping and reporting requirements of the jurisdiction in which he or she administers vaccines, including reviewing the vaccine registry or other vaccination records prior to administering a vaccine.	The pharmacist must comply with recordkeeping and reporting requirements of the jurisdiction in which he or she administers vaccines, including: <ul style="list-style-type: none"> • Informing the patient's primary care provider, when available • Submitting the required immunization information to the state or local immunization information system (vaccine registry) • Complying with requirements with respect to reporting adverse events • Complying with requirements whereby the person administering a vaccine must review the vaccine registry or other vaccination records prior to administering a vaccine
Well-child Visit Requirement	If the patient is 18 years of age or younger, the pharmacist, intern, or technician 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. Resources: Well-Child Visit Brochure , Template Referral Form Well-Child Visit , Well-Child Checkup Letter	
Additional Requirements	The pharmacist 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)	



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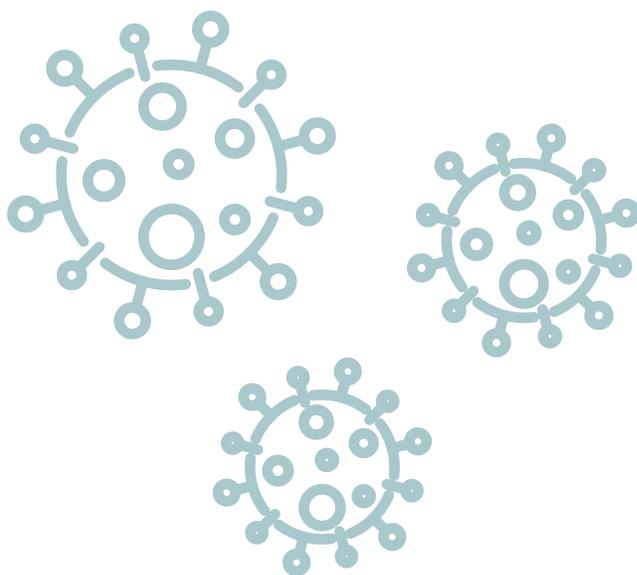
*Definitions

State-Authorized Pharmacy Intern (“Intern”)

- Pharmacy interns working in states with licensure and/or registration requirements must be licensed and/or registered in accordance with state requirements.
- Pharmacy interns working in states without licensure and/or registration requirements must be authorized by the state—or board of pharmacy in the state—in which the practical pharmacy internship occurs.

Qualified Pharmacy Technician (“Technician”)

- Pharmacy technicians working in states with licensure and/or registration requirements must be licensed and/or registered in accordance with state requirements.
- Pharmacy technicians working in states without licensure and/or registration requirements must have a Certified Pharmacy Technician (CPhT) certification from either the Pharmacy Technician Certification Board or the National Healthcareer Association.



***Disclaimer:** Information related to the COVID-19 pandemic is changing rapidly. 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.*

