

HHS Expansion for Pharmacists and Pharmacy Interns to order and administer vaccines to children age 3 to 18 under the Public Readiness and Emergency Preparedness Act (PREP Act) to increase access to lifesaving childhood vaccines and decrease the risk of vaccine-preventable disease outbreaks as children across the United States return to daycare, preschool and school.

Who does this apply to?

This federal amendment authorizes State-licensed pharmacists (and pharmacy interns acting under their supervision to administer vaccines, if the pharmacy intern is licensed or registered by his or her State board of pharmacy) to order and administer vaccines to individuals ages 3 through 18 years, subject to several requirements:

- The vaccine must be approved or licensed by the Food and Drug Administration (FDA).
- The vaccination must be ordered and administered according to the CDC's Advisory Committee on Immunization Practices (ACIP) immunization schedules.
- The licensed pharmacist must complete a practical training program of at least 20 hours that is approved by the Accreditation Council for Pharmacy Education (ACPE). This training program must include hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines. (It is the Arkansas State Board of Pharmacy's opinion that this could be done in one of two ways: 1. Via the training obtained as part of your PharmD education in an ACPE Accredited College of Pharmacy, or, 2. By completing an immunization CE course from an ACPE Accredited provider that matches this criteria. It is important to note that while many colleges do both of these things, in some instances the colleges have mapped their curriculum and skills check off to show how they have met or exceeded the same criteria as the separate CE course)
- The licensed or registered pharmacy intern must complete a practical training program that is approved by the ACPE. This training program must include hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines. (Same notes as the above requirement for pharmacists)
- The licensed pharmacist and licensed or registered pharmacy intern must have a current certificate in basic cardiopulmonary resuscitation.
- The licensed pharmacist must complete a minimum of two hours of ACPE-approved, immunization-related continuing pharmacy education during each State licensing period.
- The licensed pharmacist 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, submitting the required immunization information to the State or local immunization information system (vaccine registry), complying with requirements with respect to reporting adverse events, and complying with requirements whereby the person administering a vaccine must review the vaccine registry or other vaccination records prior to administering a vaccine.
- The licensed pharmacist must inform his or her childhood-vaccination patients and the adult caregivers accompanying the children of the importance of a well-child visit with a pediatrician or other licensed primary care provider and refer patients as appropriate.

Breaking this down further:

It is important to note that this federal action does not change anything for patients that are over the age of 18 which still fall fully under state authority and requirements.

If you are not utilizing the current methods for the provision of vaccines/immunizations under an Arkansas Protocol and are instead utilizing the expanded authority under the PREP Act the following would apply:

- You cannot use the prescriber of record from a protocol unless actually using the protocol under current rules.
- Billing may be an issue when using the PREP Act depending on how an individual insurance company may or may not accept billing under the pharmacist's direct authority.
- Administered vaccines must still be reported into the state's repository.
- Even though our State Board of Pharmacy has waived current CPR requirements at this time, the PREP Act requires current CPR
- If using the PREP Act, the pharmacist or intern does not necessarily need an endorsement on their license to administer medications but must have the required training as outlined as well as the CE as outlined by the Act.

Source Documents found at:

<https://www.hhs.gov/sites/default/files/third-amendment-declaration.pdf>

https://www.hhs.gov/about/news/2020/08/19/hhs-expands-access-childhood-vaccines-during-covid-19-pandemic.html?fbclid=IwAR3z3oO_Wmn2r40403SHabMpfjOkrOYIPj4wy1-frTRtdJHf7JXFlvRE7NE