

MISSOURI BOARD OF PHARMACY

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STATEMENT ON HHS EXPANDED VACCINE AUTHORITY

(9-4-20)

The United States Department of Health and Human Services (HHS) recently amended its [Declaration](#) under the Public Readiness and Emergency Preparedness Act (PREP Act) to authorize pharmacists to order and administer childhood vaccines during the COVID-19 pandemic. Specifically, HHS' amendment authorizes a Missouri licensed pharmacist to order and administer vaccines to children from 3-18 years old, subject to training and compliance requirements listed in the emergency [Declaration](#).

Governor Parson subsequently issued the following waiver pursuant to the State of Emergency:

The provisions of § 338.010 are hereby waived to extend the practice of pharmacy to allow a current and active Missouri licensed pharmacist to provide childhood vaccines as authorized by the United State Department of Health and Human Services (HHS) during the COVID-19 pandemic, under the Public Readiness and Emergency Preparedness Act (PREP), or:

1. Pursuant to a statewide standing order issued by the Director of the Missouri Department of Health and Senior Services (DHSS), if a physician, or by a physician approved and designated by DHSS, in compliance with HHS' authorization under the PREP Act during the COVID-19 pandemic, or
2. Pursuant to a protocol with a Missouri licensed physician, in compliance with HHS' authorization under the PREP Act during the COVID-19 pandemic.

HHS' authorization and the state waiver are currently in effect.

PRACTICE TIPS:

The approved immunization waiver allows pharmacists to administer HHS authorized vaccines to children 3-18 years old either directly under HHS' authorizations, or pursuant to a statewide standing order issued by DHSS, or pursuant to a protocol with a Missouri licensed physician. Pharmacists must be competent to perform the services provided and must ensure patient care services are safely performed in accordance with applicable standards of care.

- The HHS authorization only applies to childhood vaccines for patients ages 3-18.
- Pharmacists immunizing pursuant to HHS' authorization/the state COVID-19 waiver must comply with all training, compliance and documentation requirements established by HHS, regardless of immunization method chosen (e.g., via HSS authority, DHSS standing order, or by protocol). Pharmacies/pharmacists should maintain proof of training in their records; Compliance documentation will be requested during an inspection.
- No additional Board licensure or notification is required for Missouri-licensed pharmacists/intern-pharmacists administering HHS authorized vaccines. A Notification of Intent does not have to be filed with the Board for HHS authorized vaccines.



- As authorized in HHS' amended Declaration, a Missouri-licensed intern pharmacist may administer or assist with HHS authorized vaccines under the direct supervision of a pharmacist. See rule 20 CSR 2220-2.710 for direct supervision requirements.
- For vaccines administered solely under HHS' authorization (i.e., not by protocol or state standing order), the pharmacist should be listed as the ordering prescriber in the pharmacy's prescription records.
- For vaccines administered pursuant to a DHSS standing order, the authorizing physician for the applicable standing order should be recorded as the authorized prescriber. DHSS is in the process of drafting pharmacist standing orders for HHS authorized vaccines; Licensees should monitor the Board's website for additional information.**
- For vaccines administered pursuant to a physician protocol, the authorizing physician should be recorded as prescriber.** Protocols must be with a Missouri-licensed physician. Licensees should consult with legal counsel on necessary protocol elements. At a minimum, the Board recommends including the protocol requirements listed in 20 CSR 2220-6.050. Current protocols may be amended to include additional vaccines and age ranges.
- For vaccines not covered under the HHS authorization, all Missouri statutes and regulations still apply.

*** Additional MO HealthNet payment/reimbursement guidance may be issued by MO HealthNet at a later date.*

Compliance questions may be addressed to compliance@pr.mo.gov or the Board office.

