

MISSOURI BOARD OF PHARMACY

MISSOURI BOARD OF PHARMACY STATEMENT ON HHS EXPANDED VACCINE AUTHORITY (9-23-20)

On September 9, 2020, 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 COVID-19 vaccines to individuals ages 3 or older, subject to certain requirements.

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 order and administer COVID-19 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 waiver allows pharmacists to order and administer COVID-19 vaccines to individuals ages 3 or older directly under HHS' authorization, 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.

- 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 administering COVID-vaccines as authorized by HHS authorized. A Notification of Intent does not have to be filed with the Board.



- As authorized in HHS' amended [Declaration](#), a Missouri-licensed intern pharmacist may administer or assist with COVID-19 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. The Board will be consulting with DHSS on the authorized standing order; 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 issued by 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 the COVID-19 vaccine(s).

*** 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.

