

MISSOURI BOARD OF PHARMACY

MISSOURI BOARD OF PHARMACY E-ALERT (3-31-2021)

STATE OF EMERGENCY EXTENSION

Governor Parson has extended the COVID-19 State of Emergency until August 31, 2021 (see [Executive Order 21-07](#)). At this time, all previously issued Board waivers have been continued until August 31st. A full list of approved waivers are available on the Board's website. *Note: The Governor's Office is reviewing all state agency COVID-19 waivers; Approved pharmacy waivers may change in the future.*

RECENT DHHS PREP ACT CHANGES

On March 11, 2021, the U.S. Department of Health and Human Services (DHHS) issued their [7th amendment to their emergency PREP Act Declaration](#).

1. DHHS' amended PREP Act Declaration allows inactive, expired, and lapsed pharmacists to administer COVID-19 vaccines, if the individual's pharmacist license was previously active in a U.S. state/territory within the last five (5) years. No additional Board licensure or notification is required under the federal Declaration.

Inactive, expired and lapsed pharmacists should review [DHHS' emergency Declaration](#) to ensure compliance (additional DHSS restrictions/requirements apply). DHHS' authorization only applies to COVID-19 vaccines. The Board is requesting that inactive, expired and lapsed pharmacists administering COVID-19 vaccines in Missouri file an [Emergency Practice Notification form](#) with the Board (available on the Board's website).

2. Non-resident pharmacists, intern pharmacists, and pharmacy technicians who are not licensed in Missouri can provide COVID-19 vaccines under DHHS' emergency Declaration, "in association with a COVID-19 vaccination effort by a federal, State, local Tribal or territorial authority, or by an institution in the State in which the COVID-19 vaccine covered countermeasure is administered." The Board is requesting that non-resident pharmacists, intern pharmacists, and pharmacy technicians practicing in Missouri pursuant to the emergency Declaration file an [Emergency Practice Notification form](#) with the Board (available on the Board's website).



COVID-19 VACCINE TRAINING

Pharmacists, intern pharmacists and pharmacy technicians administering COVID-19 vaccines under DHHS' emergency PREP Act Declaration, should comply with the training requirements identified in DHHS' declaration (see Attached DHHS Chart). Training questions should be addressed to DHHS. Questions regarding the state standing orders should be addressed to the Missouri Dept. of Health.

AMENDED STATE STANDING ORDERS

The Missouri Department of Health and Senior Services (DHSS) has amended the statewide standing orders for COVID-19 vaccines, effective March 22, 2021. The amended orders are available on DHSS' website at: <https://health.mo.gov/living/healthcondiseases/communicable/novel-coronavirus/state-wide-orders.php>

USE OF OTHER HEALTHCARE PROFESSIONALS FOR COVID-19 VACCINES

The Board has been asked if pharmacies can use non-pharmacy healthcare providers to provide COVID-19 vaccine to patients.

Missouri law does not prohibit pharmacies from using non-pharmacy healthcare providers to provide COVID-19 vaccines (e.g., nurses). Licensees should verify that the non-pharmacy healthcare provider is authorized to administer COVID-19 vaccines either under the provider's scope of practice, DHHS' [emergency Declaration](#), or the statewide COVID-19 [standing orders](#).

- The pharmacy may use their pharmacy software system to conduct billing/vaccine reporting for administrations provided by a non-pharmacy healthcare provider. If a prescription number is assigned to the billing/reporting record, the computer record and any hard copy or image should clearly indicate that it is a billing record and not a prescription record.
- Non-pharmacy healthcare providers administering COVID-19 vaccines do not have to be registered as pharmacy technicians, unless the non-pharmacy healthcare provider will have independent access to drug inventory (e.g., without a pharmacist present and supervising).

PROTOCOLS?

The Board has received multiple questions asking if pharmacists need to have a physician protocol to administer COVID-19 vaccines. Pharmacists administering COVID-19 vaccines under DHHS' emergency Declaration or under the statewide standing orders do not need a physician protocol. Pharmacists may choose to use a protocol, but a protocol is not required.



Expanding the COVID-19 Vaccination Workforce

COMMITMENT TO ENDING THE COVID-19 PANDEMIC

The federal government is committed to providing enough COVID-19 vaccine for every adult in America who wants to be vaccinated. The Biden Administration is supporting state, local, territorial, and tribal (SLTT) health agencies in administering the vaccines equitably as they become increasingly available.

As of March 2021, the U.S. Food and Drug Administration (FDA) has authorized three safe and effective vaccines for emergency use, and federal agencies continue to work with other companies on clinical trials of additional vaccines. Additionally, the federal government has taken significant steps to expand the manufacturing capacity of the authorized vaccines and the supplies needed to administer them.

THE NEED FOR VACCINATORS

As hundreds of millions more vaccine doses are manufactured and distributed throughout the country, more locations and more healthcare personnel qualified to administer those vaccine doses may be needed. Through the Public Readiness and Emergency Preparedness (PREP) Act Declaration, the federal government has provided a pathway for SLTTs to rapidly expand and support their vaccination workforces as needed – including some healthcare professionals and students in healthcare professions not traditionally in the role of vaccinator and retired healthcare professionals. The PREP Act Declaration should be used by SLTTs to complement other efforts to enhance vaccination awareness and administration, such as health education. In addition, states are encouraged to further expand the categories of persons authorized to administer COVID-19 vaccines in their states, as authorized under the PREP Act, to respond to local needs and availability of potential vaccinators.



What is a PREP Act Declaration?

The PREP Act allows the Secretary of the U.S. Department of Health and Human Services (HHS) to issue a declaration that extends liability protections to entities and individuals who manufacture, distribute, or administer covered medical countermeasures against a public health threat or emergency. In March 2020, the Secretary issued a PREP Act Declaration covering COVID-19 tests, drugs, and vaccines providing liability protections to manufacturers, distributors, SLTTs, licensed healthcare professionals, and others identified by the Secretary (qualified persons) who administer COVID-19 countermeasures. The Declaration has been amended several times to expand liability protections, including prior amendments to cover licensed healthcare professionals who cross state borders and federal response teams. On March 12, 2021, the Acting Secretary of HHS issued the 7th Amendment to the PREP Act to extend liability protections to specified healthcare professionals who may not usually administer vaccines in their scope of practice or who have recently expired licenses, and students of specified healthcare professions who administer COVID-19 vaccines. The PREP Act also provides for a Countermeasure Injury Compensation Program for certain individuals who sustain serious injuries or die from receiving the countermeasures.



Who is Covered?

Licensed health professionals or other individuals authorized by the state to administer COVID-19 vaccines.

Health professionals and other individuals identified as qualified persons under the PREP Act Declaration amendments are also covered.

To register as a volunteer vaccinator in your state or U.S. territory, visit <https://www.PHE.gov/COVIDvaccinators>



What is the Impact on SLTTs?

The PREP Act and Declaration preempt state requirements, such as more limited licensing or scope of practice requirements, that effectively prohibit a qualified person from prescribing, dispensing, or administering vaccines. Requirements that do not effectively prohibit qualified persons, such as additional training, are not preempted. Ultimately, states and territories may choose which qualified persons to use for vaccinations in their jurisdiction.

For more information on qualified persons and specific requirements or to register as a volunteer vaccinator in your state and U.S. territory, visit the PREP Act COVID-19 Declaration webpage: <https://www.PHE.gov/COVIDvaccinators>

Who is Covered Under the COVID-19 PREP Act Declaration?

QUALIFIED PERSONS

The following table provides those categories of qualified persons covered to administer COVID-19 vaccines under the PREP Act Declaration and its amendments:

Health Professionals (Current and Previously Active within the last 5 years)*		Healthcare Students*
<ul style="list-style-type: none"> Dentists Emergency medical technicians (advanced or intermediate EMTs) Midwives Nurses <ul style="list-style-type: none"> Advanced practice registered nurses (APRN) Registered nurses (RN) Licensed practical nurses (LPN) 		<ul style="list-style-type: none"> Dental Emergency medical technicians (advanced or intermediate EMTs) Medical Midwifery Nursing Optometry Paramedic Pharmacy and pharmacy intern Physician assistant Podiatry Respiratory therapy Veterinary
Other Qualified Persons		<ul style="list-style-type: none"> Persons authorized to administer COVID-19 vaccines under the law of the state where they are administering such vaccines Persons who hold a license or certificate permitting them to administer vaccines under the law of another state Federal responders, including uniformed services or federal government employees, contractors, or volunteers

***Training and Supervision Requirements** *(unless separately authorized by SLTTs or under their scope of practice; for other requirements please see the Declaration)*

- Documentation of completion of the [Centers for Disease Control and Prevention \(CDC\) COVID-19 Vaccine Training \(https://www.cdc.gov/vaccines/covid-19/training.html\)](https://www.cdc.gov/vaccines/covid-19/training.html) and other training required by the SLTTs where the vaccine is being administered
- Documentation of an observation period by a currently practicing healthcare professional experienced in administering intramuscular injections
- Current certification in basic cardiopulmonary resuscitation (CPR)
- Students must also be supervised by a currently practicing healthcare professional experienced in administering intramuscular injections
- Pharmacists, pharmacy interns, pharmacy technicians and pharmacy students must also complete a practical training program that is approved by the ACPE as well as a minimum of two hours of ACPE-approved immunization-related continuing pharmacy education during each state licensing period

For more information on qualified persons and specific requirements or to register as a volunteer vaccinator in your state or U.S. territory, visit the PREP Act COVID-19 Declaration webpage: <https://www.PHE.gov/COVIDvaccinators>