



Missouri Department of Health and Senior Services

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COVID-19 Vaccinator Guidance

Overview

- The federal government has delegated the prioritization and distribution of the vaccine to each state, and it has allocated vaccine doses to each state to distribute accordingly.
- The State of Missouri's plan prioritizes the vaccination of Missourians first, just as other states are prioritizing their citizens.
- Many of Missouri's metropolitan areas are located near state borders, and Missourians and non-Missourians cross the borders regularly. The State of Missouri acknowledges these realities, while prioritizing access for Missourians.
- This memo provide guidance to vaccinators related to residency status of those seeking a vaccine in Missouri.

General Guidance to Missouri Vaccinators

- The state has established clear distribution priorities, and vaccinators must adhere to these priorities.
- Infrequently, for the sole purpose of preventing a dose being wasted, it may be necessary to vaccinate a person who is ineligible and has not been determined to have a unique clinical situation that warrants an immediate vaccination. In no case should a vaccinator waste a dose.
 - In this situation, vaccinators must first make a good faith effort to vaccinate an eligible person before vaccinating an ineligible person.
- The state assumes that vaccinators are acting in good faith and complying with all relevant guidance, and will not penalize those who are making every effort to comply with the state's distribution instructions.
- Communications, marketing, advertising and other outreach conducted by a vaccinator that receives doses from the state's allocation must be targeted to Missourians, not encouraging out of state populations to travel to Missouri in order receive a vaccine.
- Vaccinators who receive allocations from the state of Missouri cannot conduct vaccinations at an out of state location.
- No Missouri vaccinator may store vaccines out-of-state overnight.

Verification of Eligibility

- The state has developed a vaccine screening and consent form with a self-attestation process.
- Vaccinators are encouraged to utilize the state's form or integrate a similar process into their own registration and consent systems.
- Whether using the state's form or a vaccinator's own process, individuals must self-attest to their status in a prioritized population and their residency.
- Vaccinators may require other forms of identification to verify residency.

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Specific Guidance in Unique Situations

High-throughput healthcare systems, FQHCs and other clinics, LPHAs, all other community providers, and mass vaccination events

- These vaccinators receive their vaccines from the state of Missouri's allocation to implement the state's distribution plan. Therefore, vaccinators must adhere to the state's priority phases and vaccinate only eligible Missourians.

On-Site, Employer-Based Vaccination Clinics

- Certain employers may arrange a vaccination clinic on site for their employees. It is assumed that these vaccination events are generally directed to a specific population at the facility, rather than the general public.
- In order to reduce the complexity of these situations, the state understands that non-Missourians may be included in these vaccination events. Vaccinators may vaccinate the population at these locations, regardless of a person's residency status.
- Adherence to the state's priority phases is required.

Federal Retail Pharmacy Program

- The federal government may directly allocate vaccine doses to retail pharmacies that are open to the general public, and these doses are not included in the state's allocation.
- Pharmacies that participate in the federal pharmacy program must adhere to the state's priority phases, although they may vaccinate any eligible person regardless of residency.

Federal Pharmacy LTCF Partnership

- The federal government may directly allocate vaccine doses to pharmacies that are vaccinating residents and staff at long term care facilities, and these doses are not included in the state's allocation.
- Pharmacies that participate in the federal pharmacy program are expected to adhere to the state's priority phases, although they may vaccinate an eligible LTCF resident or staff person regardless of residency.

Redistribution

- Some vaccinators may redistribute to other providers as part of the established vaccine distribution plan. The entity administering the doses is responsible for ensuring compliance with all state vaccine guidance.
- If the entity that is redistributing the vaccine to another vaccinator is acting in good faith, the redistributing entity will not be held responsible.
- If the entity that is redistributing the vaccine to another vaccinator has knowledge of noncompliance or participates in the noncompliance, both entities will be held accountable.

Unique Clinical Situation

- An individual may be vaccinated if a physician finds that the individual has a unique clinical situation that warrants such an elevation of priority, such unique clinical situation must be documented in the patient's chart.

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Punitive Action

The state may take punitive action against a vaccinator for not complying with Missouri's vaccination plan. Those punitive actions can include the reduction, cancellation, or reallocation of future vaccines shipments.

Reasons for punitive action include, but are not limited to:

- Disregard of the state's vaccine plan and any implementation guidance
- Disregard of the established priority phases and tiers
- Vaccinating ineligible people
- Failure to exercise good faith efforts to comply with the state's vaccine plan
- Wasting doses
- Failure to administer vaccines in a timely manner
- Other actions that are inconsistent with a vaccinator's Immunization Registry Memorandum of Agreement

Effective Date: February 19, 2021