



Pharmacy Technician Administration of Vaccines during the COVID-19 Pandemic

Updated 9/25/2024

This guidance has been updated to reflect changes made under the Federal [PREP Act](#) due to the expiration of the COVID-19 Public Health Emergency. Effective May 12, 2023, pharmacy technicians are no longer permitted to administer childhood vaccinations under the PREP Act. The most recent PREP Act Amendment can be accessed [here](#).

Registered and certified pharmacy technicians are permitted to administer immunizations under Ohio law. For more information, visit: www.pharmacy.ohio.gov/techimmunize.

With the end of the federal COVID-19 public health emergency (PHE), here is a summary of the changes under the [PREP Act](#) that will impact pharmacy technicians in Ohio effective May 12, 2023:

- **Extending coverage for COVID-19 vaccines, seasonal influenza vaccines, and COVID-19 tests.** PREP Act immunity from liability will be extended through December 2024 to pharmacists, pharmacy interns, and pharmacy technicians to administer COVID-19 and seasonal influenza vaccines (to those individuals three and over, consistent with other requirements), and COVID-19 tests, regardless of any USG agreement or emergency declaration.
- **Ending of coverage for routine childhood vaccinations.** Once there is no emergency in effect, PREP Act coverage will no longer extend to all routine childhood vaccinations by pharmacists, pharmacy interns, and pharmacy technicians.
- **For more information on pharmacist and pharmacy intern COVID-19 vaccine requirements under the PREP Act visit:** www.pharmacy.ohio.gov/COVIDvaccine

For questions about pharmacy technician vaccine administration, please review the frequently asked questions. If you need additional information, the most expedient way to

have your questions answered will be to e-mail the Board office by visiting:
<http://www.pharmacy.ohio.gov/contact.aspx>.

Q1) How does HHS define a “qualified pharmacy technician” for the purposes of the guidance?

HHS states the following:

Similarly, states vary on licensure and registration requirements for pharmacy technicians. Some states require certain education, training, and/or certification for licensure or registration; others either have no prerequisites for licensure or registration or do not require licensure or registration at all. For purposes of this guidance, to be a “qualified pharmacy technician,” pharmacy technicians working in states with licensure and/or registration requirements must be licensed and/or registered in accordance with state requirements; pharmacy technicians working in states without licensure and/or registration requirements must have a Certified Pharmacy Technician (CPhT) certification from either the Pharmacy Technician Certification Board or National Healthcareer Association.

IMPORTANT: As the HHS guidance contemplates a level of formal training to be deemed a pharmacy technician, an individual holding a registration as a pharmacy technician trainee **does not** qualify as a qualified pharmacy technician. The Board has reached out to HHS for further clarification on this issue and will provide updates as appropriate.

Q2) What are the federal requirements for pharmacy technicians to provide vaccinations under the PREP Act?

IMPORTANT: This table provides a summary of the requirements. Please review the latest amendment to the PREP Act [here](#).

	Federal Requirements
Age of Administration	Permits the administration of the following:

	<ul style="list-style-type: none"> Any FDA-approved or FDA-licensed COVID-19 or seasonal influenza vaccines (including those under an EUA) to persons ages 3 or older.
Physician Approved Protocol	<p>No physician-approved protocol is required, as pharmacists are authorized to order vaccines under the federal guidance.</p> <p>NOTE: The federal guidance requires the vaccination to be ordered by the supervising qualified pharmacist.</p>
Approved COVID-19 Immunizations	<p>Any FDA-authorized or FDA-licensed COVID-19 vaccines. In the case of a COVID-19 vaccine, the vaccination must be ordered and administered according to ACIP’s COVID-19 vaccine recommendation(s).</p>
Seasonal Influenza Vaccines	<p>In the case of seasonal influenza vaccine administered by qualified pharmacy technicians, the vaccination must be ordered and administered according to ACIP’s standard immunization schedule.</p>
Supervision Requirements	<p>The supervising qualified pharmacist must be readily and immediately available to the immunizing qualified pharmacy technicians.</p>
Training Requirements	<p>The qualified pharmacy technician (i.e. registered or certified pharmacy technician) must complete a practical training program that is approved by the Accreditation Council for Pharmacy Education (ACPE). This training program must include hands-on injection technique and the recognition and treatment of emergency reactions to vaccines.</p>
Basic Life Support Training	<p>The qualified pharmacy technician must have a current certificate in basic cardiopulmonary resuscitation.</p>

<p>Record keeping</p>	<p>The supervising qualified pharmacist must comply with record keeping requirements.</p> <p>IMPORTANT: The Board’s record keeping requirements for COVID-19 immunization administration were updated on 1/11/2021 to streamline record keeping requirements across all licensees. See Q10 of this document for more information.</p> <p>For non-COVID immunizations, the supervising qualified pharmacist must comply with the standard immunization requirements in OAC 4729:5-5-04 (L).</p>
<p>Reporting</p> <p><i>See Q9 of this document for reporting requirement update.</i></p>	<p>The supervising qualified pharmacist must comply with Ohio’s reporting requirements. See Q9 of this document for additional information.</p>
<p>Well-Child Visit Reminder</p>	<p>The supervising pharmacist must, if the patient is 18 years of age or younger, inform the patient and the adult caregiver accompanying the patient of the importance of a well-child visit with a pediatrician or other licensed primary-care provider and refer patients as appropriate.</p> <ul style="list-style-type: none"> ▪ The American Pharmacist Association has a handout that covers the importance of well-child visits: www.pharmacy.ohio.gov/WellChild ▪ The American Academy of Pediatrics offers information on well-child visits, including informational handouts. Click here for more information.
<p>Compliance with CDC Requirements</p>	<p>The supervising qualified pharmacist must comply with any applicable requirements (or conditions of use) as set forth in the CDC’s COVID-19 vaccination provider</p>

	agreement and any other federal requirements that apply to the administration of COVID-19 vaccine(s).
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Q3) Am I required to document a well-child visit reminder?

Yes. If required, well-child visit reminders should be documented to demonstrate compliance with the federal requirements. Such documentation must be maintained for three years and must be able to be produced within 3-business days upon the request of the Board or employee of the Board.

- The American Pharmacist Association has a handout that covers the importance of well-child visits: www.pharmacy.ohio.gov/WellChild
- The American Academy of Pediatrics offers information on well-child visits, including informational handouts. [Click here for more information.](#)

Q4) Am I required to maintain a current certificate in basic cardiopulmonary resuscitation from a specific organization to meet the federal requirements?

The guidance from HHS does not specify an organization.

Q5) How do I know if my immunization training meets the training standards required by HHS?

As a reminder, the federal authorization for pharmacy technicians requires the following training:

The qualified pharmacy technician must complete a practical training program that is approved by the Accreditation Council for Pharmacy Education (ACPE). This training program must include hands-on injection technique and the recognition and treatment of emergency reactions to vaccines.

Registrants and licensees shall be responsible for reviewing courses to determine if the training meets the requirements established by HHS.

Q6) Does the authorization by HHS have an expiration date?

The authorization by HHS is in response to the COVID-19 pandemic. The Board will provide notification to licensees when/if the federal authorization is rescinded.

Q7) What are the record keeping requirements?

A qualified pharmacy technician and their supervising pharmacist should maintain documentation demonstrating compliance with the HHS guidance.

REMINDER: A pharmacist and pharmacy technician must comply with the record keeping requirements for immunization administration. See Q10 of this document for more information.

Q8) How does a pharmacist document an order for a vaccine?

Pharmacists must document the order for COVID-19 vaccine administration and those administered by a pharmacy technician they are supervising on a prescription form or other record, which may be assigned a number for record keeping purposes. Such records must be maintained for three years from the date of the order.

Q9) Are pharmacists supervising pharmacy technicians required to comply with the Ohio vaccine reporting requirements?

Yes. The process established by HHS requires a licensed pharmacist to comply with Ohio's vaccine reporting requirements. As a reminder, Ohio's reporting requirements are as follows [ORC [4729.41](#) (C)(4)(b)]:

For each immunization administered to an individual by a pharmacist or pharmacy intern, other than an immunization for influenza administered to an individual eighteen

years of age or older, the pharmacist or pharmacy intern shall notify the individual's primary care provider or, if the individual has no primary care provider, the board of health of the health district in which the individual resides or the authority having the duties of a board of health for that district under section 3709.05 of the Revised Code. The notice shall be given not later than thirty days after the immunization is administered.

Additionally, the supervising qualified pharmacist must comply with any applicable requirements (or conditions of use) as set forth in the CDC's COVID-19 vaccination provider agreement and any other federal requirements that apply to the administration of COVID-19 vaccine(s).

Please be advised that OAC 4729:1-3-02 of the Administrative Code requires a pharmacist or pharmacy intern to notify a patient's primary care provider or local health department of immunization administration using any of the following methods:

- (1) Electronic mail;
- (2) Interoperable electronic medical records system;
- (3) Facsimile;
- (4) Electronic prescribing system;
- (5) Electronic pharmacy record system;
- (6) Documented verbal communication;
- (7) Reporting to the state's immunization registry; or
- (8) Any other method of notification that might reasonably be expected to allow for the confirmed transmission of the required notification.

Q10) What are Ohio’s record keeping requirements for pharmacy personnel administering COVID-19 vaccinations?

In response to the COVID-19 pandemic, the Ohio Board of Pharmacy has adopted the following resolution:

To ensure streamlined vaccine administration, the Ohio Board of Pharmacy temporarily authorizes records of COVID-19 vaccine administration by pharmacy personnel (pharmacists, interns, technicians) to comprise the following:

Records of COVID-19 vaccine administration by pharmacy personnel shall contain the name, strength, dosage form, and quantity of the vaccine administered, the name and date of birth of the person to whom or for whose use the vaccine was administered, the date of administration, and the identification of the pharmacy personnel administering the drug. This resolution does not supersede any record keeping requirements from the Ohio Department of Health or any federal agency.

This resolution is being issued in accordance with a Board resolution adopted on May 5, 2020. This resolution shall remain in effect until rescinded by the Board.

With the adoption of this resolution, pharmacy personnel should note the following:

1. Vaccine administration records across all TDDDs are now uniform. These are the same record keeping requirements for the administration of vaccines in clinics and other non-pharmacy sites.
2. This only applies to the administration of the COVID-19 vaccine.
3. The resolution only requires the identification - not the positive identification - of the individual administering the drug. This means that pharmacy personnel administering the COVID-19 vaccine will still need to document who administered the vaccine, but that such documentation does not have to meet the standard of positive identification.
4. Nothing in this resolution prohibits pharmacy personnel from complying with the original vaccine record keeping requirements set forth in OAC [4729:5-5-04](#) (L).

Q11) Can registered pharmacy technicians and certified pharmacy technicians prepare the COVID-19 vaccine for administration?

Yes. Any state prohibitions on the preparation of the COVID-19 vaccine (such as who can perform sterile compounding) are pre-empted by the federal authorization. Therefore, registered and certified pharmacy technicians may assist with the preparation of FDA-authorized COVID-19 vaccines for administration.