Pharmacists’ Administration of Vaccines

By: James Orlando, Chief Attorney
November 14, 2019 | 2019-R-0232

Issue

Summarize Connecticut law and regulations on pharmacists’ administration of vaccines.

Summary

State law authorizes licensed pharmacists to administer to adults (age 18 or older) any federally approved vaccine listed on the National Centers for Disease Control and Prevention’s (CDC) Adult Immunization Schedule (CGS § 20-633). The vaccination must be administered according to an order (typically a standing order) of a licensed health care provider and the Department of Consumer Protection’s (DCP) implementing regulations.

The law requires the DCP commissioner, in consultation with the public health commissioner and the Commission of Pharmacy, to adopt regulations:

1. requiring pharmacists who administer vaccines to successfully complete a training program;
2. defining the basic requirements of the training program, including several specified components;
3. identifying qualifying accredited training programs; and
4. establishing a control and reporting system.

Recent Bills

The Public Health Committee has recently considered bills that would expand pharmacists’ authority to include administering vaccines to minors, but no such bills have become law.

For example, in 2019 the committee voted out a bill that would have allowed pharmacists to administer the flu vaccine, with parental or guardian consent, to minors age 12 years or older (sSB 94).
See below for a summary of these regulations.

PA 05-212 first granted pharmacists the authority to administer flu vaccines. In 2010, the law was expanded to include vaccines for invasive pneumococcal disease and herpes zoster (shingles) (PA 10-82). In 2012, the law was again expanded to include any federally approved vaccine listed on the CDC’s Adult Immunization Schedule (PA 12-207).

**Regulations on Pharmacists’ Administration of Vaccines**

In 2006, DCP adopted regulations implementing the law on pharmacists’ administration of vaccines. The regulations were last amended in 2012 (Conn. Agencies Reg., § 20-633-1 et seq.).

**Training Program**

Under the regulations, to be eligible to administer vaccines as authorized by law, a pharmacist must complete an immunization training program that is accredited by the Accreditation Council for Pharmacy Education (Conn. Agencies Regs., §§ 20-633-2 & -3).

The program’s course of study must include current CDC guidelines and recommendations for the vaccination of adult patients. It must also include the following components:

1. mechanisms of action for vaccines, contraindications, drug interactions, and monitoring after vaccine administration;
2. subcutaneous and intramuscular injections;
3. immunization screening questions, informed consent forms, recordkeeping, registries, and reporting mechanisms;
4. vaccine storage;
5. biohazard waste disposal and sterile techniques;
6. establishing protocols;
7. immunization coalitions and other available community resources;
8. mechanisms for reporting adverse events to the Vaccine Adverse Event Reporting System;
9. reimbursement procedures and vaccine coverage by federal, state and local entities;
10. administration techniques;
11. current CPR certification; and


Control and Reporting Systems

Under the regulations, in order for a pharmacist to administer vaccines, a licensed health care provider authorized to order or prescribe legend drugs must establish a written protocol with the pharmacist or pharmacy. The protocols must be in writing and must include the following:

1. the name of the provider and pharmacist and the types of vaccines that the pharmacist is authorized to administer;

2. the procedures, decision criteria, or plan the pharmacist must follow when exercising the administration authority, including when to refer the patient to the physician;

3. emergency procedures; and

4. recordkeeping and documentation procedures, including recording the name of the pharmacist who administered the vaccine (Conn. Agencies Reg., § 20-633-5).

JO:kl