

NCPA Member Summary of HHS Guidance for *PREP* Act Coverage for Qualified Pharmacy Technicians and State-Authorized Pharmacy Interns

This is NCPA's summary of the October 21, 2020 [announcement](#) by the Department of Health and Human Services (HHS) that authorizes qualified pharmacy technicians and State-authorized pharmacy interns to administer childhood vaccines, COVID-19 vaccines when made available, and COVID-19 tests during the COVID-19 public health emergency (PHE) through a [guidance](#) for *Public Readiness and Emergency Preparedness (PREP) Act* coverage.

For the duration of the COVID-19 PHE, qualified pharmacy technicians and State-authorized pharmacy interns acting under the supervision of a qualified pharmacist are now authorized under the *PREP Act* to:

- **Administer vaccines to individuals ages three through 18 years,**
- **Administer COVID-19 vaccines when made available, and**
- **Administer COVID tests, including serology tests.**

This authorization preempts any state or local legal requirements that prohibits qualified pharmacy technicians and State-authorized pharmacy interns from administering childhood vaccines (including COVID-19 vaccines when available) or COVID-19 tests.

To be considered 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. Although some states do not require pharmacy interns to be licensed or registered by the state board of pharmacy, this guidance clarifies that the pharmacy intern must be authorized by the state or board of pharmacy in the state in which the practical pharmacy internship occurs (e.g., meets state board of pharmacy requirements regarding enrollment in a professional degree program of a school or college of pharmacy approved by the board and satisfactorily progressing towards meeting requirements for licensure as a pharmacist).

Childhood and COVID-19 Vaccine Guidance for Qualified Pharmacy Technicians and State-Authorized Pharmacy Interns

Qualified pharmacy technicians and State-licensed pharmacy interns acting under the supervision of a pharmacist are authorized to administer FDA-authorized or FDA-licensed COVID-19 vaccines to persons ages three or older or ACIP-recommended childhood vaccinations to persons ages three through 18, subject to the following requirements:

- The vaccination must be ordered by the supervising qualified pharmacist.
- The supervising qualified pharmacist must be readily available and immediately available to the immunizing qualified pharmacy technicians.
- The vaccine must be FDA-authorized or FDA-licensed.

- In the case of a COVID-19 vaccine, the vaccination must be ordered and administered according to ACIP's COVID-19 vaccine recommendation(s).
- In the case of a childhood vaccine, the vaccination must be ordered and administered according to ACIP's standard immunization schedule.
- The qualified pharmacy technician or State-authorized pharmacy intern 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.
- The qualified pharmacy technician or State-authorized pharmacy intern must have a current certificate in basic cardiopulmonary resuscitation (CPR).
- The qualified pharmacy technician must complete a minimum of two hours of ACPE-approved, immunization-related continuing pharmacy education during the relevant State licensing period(s).
- The supervising qualified pharmacist must comply with recordkeeping and reporting requirements of the jurisdiction in which he or she administers vaccines, including informing the patient's primary care provider when available and submitting the required immunization information to the state or local immunization information system (vaccine registry).
- The supervising qualified pharmacist is responsible for complying with requirements related to reporting adverse events.
- The supervising qualified pharmacist must review the vaccine registry or other vaccination records prior to ordering the vaccination to be administered by the qualified pharmacy technician or State-authorized pharmacy intern.
- The qualified pharmacy technician and State-authorized pharmacy intern 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.
- 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).

COVID-19 Testing Guidance for Qualified Pharmacy Technicians and State-Authorized Pharmacy Interns

The guidance authorizes qualified pharmacy technicians and State-authorized pharmacy interns to administer COVID-19 tests, including serology tests, that the FDA has approved, cleared, or authorized, and qualify as "covered persons" under the PREP Act and may receive immunity under the PREP Act with respect to claims for loss caused by, arising out of, relating to, or resulting from the administration or use of FDA-authorized COVID-19 tests.