

Pharmacist Authority to Administer Immunizations and Vaccinations FREQUENTLY ASKED QUESTIONS

Pharmacists are encouraged to read 17 DCMR Chapter 65. Section 6512 of the regulations specifically addresses a pharmacist's authority to administer immunizations and vaccinations.

1. I am a DC licensed Pharmacist, can I administer immunizations?

No, not unless you have applied for and received a certification from the District of Columbia Board of Pharmacy authorizing you to administer immunizations and vaccinations.

2. How do I obtain an application form for certification to administer immunizations and vaccinations?

The application form is available on the [Board of Pharmacy Website](#) under the Immunization and Vaccination section.

3. Can I pay the application fee by credit card? If not, to whom should I make the check payable?

No. You may pay the application and license/registration fee by a single check or money order. It is recommended that you pay by check, so that you have proof of payment. Checks or money orders should be made payable to DC Treasurer and submitted with your license application packet. Do NOT send cash. Please print your name on your check, if it is not pre-printed.

4. How long does it take to process my application?

Please allow 7-10 business days for your application to be processed and approved. You may check the status of your application by visiting the [HPLA Online Licensing System](#).

5. Can I administer immunizations under the supervision of another pharmacist while my application is pending?

No. You are not authorized to administer vaccinations and immunizations in the District of Columbia until you have been certified to do so by the Board and meet all of the requirements for administration.

6. I have received my certification to administer immunizations and vaccinations; can I begin administering immunizations to the patients who come into my pharmacy?

No, in addition to the certification, you must have a written protocol signed and dated by a DC licensed physician authorizing you to administer only the vaccinations he or she deems appropriate and only to his or her patients upon receipt of either a valid prescription or a standing physician order.

If the written protocol is expressly limited to only Hepatitis, Shingles, Human Papilloma virus, Tetanus, Tdap, Meningococcal, *Haemophilus influenza*, pneumococcal and influenza vaccinations, you may have a single protocol with only one DC licensed physician and the physician may authorize you to administer these vaccinations to any of your patients any person of age twelve (12) and older with parental consent, or age eighteen (18) and older with valid identification.

7. Where can I find a Board-approved course to receive the required training for administering immunizations and vaccinations?

A list of Board-approved certification courses is available on the [Board Immunization and Vaccination](#) web page.

8. Does my certification have to be renewed?

Yes, your certification to administer immunizations and vaccinations expires on February 28th of each odd-numbered year simultaneously with your pharmacist license. You may apply for renewal of the certification as part of your license renewal process.

Note that in order to renew the certification you must ensure that at least two (2) credits of your required forty (40) hours of continuing education are completed in courses relevant to the administration of immunizations and vaccinations.

9. Can I use my basic CPR course for laypersons to apply for the certification?

No you must possess an active certification in cardiopulmonary resuscitation for health care providers in order to qualify for certification, per §6512.2(b)(2).

10. The regulations state that the location in the pharmacy where vaccinations and immunizations are given shall “ensure privacy”. What does this mean?

Typically, this will require, at a minimum, setting up temporary screens so that the patients are out of the view of others while receiving the vaccination.

11. What are the requirements for pharmacist certification?

The following information is required for certification to administer immunizations and vaccinations, per §6512.2 and §6512.3:

- Submit a completed application and pay the required fee;
- Demonstrate to the satisfaction of the Board that he or she:
 - Is licensed in good standing under the Act to practice pharmacy;
 - Possesses and maintains an active certification in cardiopulmonary resuscitation (CPR) for health care providers; and
 - Has successfully completed an ACPE approved course approved by the Board of Pharmacy which meets requirements defined in §6512.3 (3)
 - Maintain current certification in cardiopulmonary resuscitation for health care providers
 - Completes two (2) hours of continuing education each renewal period relevant to the administration of immunizations and vaccinations, as part of the continuing education credits required under §6513.4 and submit proof upon request to the Board.
 - Administer vaccines and immunizations in accordance with CDC guidelines.”

12. Are there other requirements for administering immunizations and vaccinations in DC?

Yes, there has to be a written statement in the protocol that describes the content and the appropriate mechanisms for the pharmacist to report the administration of immunizations and vaccinations to both the patient’s primary physician (if applicable), and to the physician issuing the written protocol, if they are not the same person, within the time frames specified in the protocol.

The following information must be included in the report that is provided to the physician(s):

- The name, address, gender, allergies, and date of birth of the individual receiving the immunization or vaccination;
- The date of administration;
- The route and site of the immunization or vaccination;
- The name, dose, manufacturer's lot number, and expiration date of the vaccine;
- The name of the pharmacist administering the immunization or vaccination; and
- Any adverse events encountered.”

13. What information must be contained in the protocol?

The protocol must specifically identify the pharmacist(s) authorized to administer vaccinations, it must specifically state which vaccinations can be administered, and it must identify the patient or groups of patients who can receive the immunizations. For a complete list of all of the items that are required in a protocol, see §6512.7.

14. Do I need a separate protocol for each physician to whose patients I intend to administer immunizations and vaccinations?

Yes, a physician can only authorize you to administer immunizations and vaccinations to his or her own patients or to the patients of his or her group practice. For a complete listing of the patient groups and who is authorized to sign the protocol, see §6512.7.

If the written protocol is expressly limited to only Hepatitis, Shingles, Human Papilloma virus, Tetanus, Tdap, Meningococcal, *Haemophilus influenza*, pneumococcal and influenza vaccinations, you may have a single protocol with only one DC licensed physician and the physician may authorize you to administer these vaccinations to any of your patients of age twelve (12) and older with parental consent, or age eighteen (18) and older with valid identification.

15. What is the difference between a written protocol and a standing order?

The **written protocol** is the governing agreement between the delegating physician and the pharmacist. §6559.1 defines protocol as a “specific written plan for a course of medical treatment containing a written set of specific directions created by the physician for one or more patients”. All of the elements which must be contained in the written protocol are set forth in §6512.7. It is the governing agreement between the physician and the pharmacist. There is no required format for the written protocol; however it must contain all of the elements required by §6512.7.

A **standing order**, stipulating a specific treatment approach for patients who meet certain criteria or have a specific medical condition, thus eliminating the need for individual physician's orders or prescriptions for those

16. Can a physician use one written protocol and standing order to cover all of his or her patients?

Yes. The written protocol is the governing agreement between the delegating physician and the pharmacist. Once the written protocol agreement is in place, the physician can choose to execute one standing order to cover all of his or her patients of age twelve (12) and older with parental consent, or age 18 and older with valid identification, and eliminate the need to provide each patient with an individual prescription.

17. How often must the written protocol be review/updated?

The protocol must be reviewed with the physician annually, per §6512.8.

18. Who is responsible for the accuracy and updating of the protocol?

The pharmacist is responsible for updating the protocol with the physician.

19. Can I administer an immunization to a patient who has a prescription order for the immunization if I don't have a written protocol on file with the patient's physician?

No, you must have a written protocol agreement with the patient's physician in addition to the prescription or standing order, per §6512.7.

20. Can I administer vaccinations to persons under age 12 with parental consent?

No, in addition to parental consent, you must also have a protocol agreement with the minor's physician who has an established relationship with the minor, and you must have a referral from the physician specifically requesting the immunization for that minor.

21. Can I administer an influenza vaccine to a 5 year old child in DC?

Yes. However a pharmacist certified by the Board to administer immunizations and vaccinations shall only administer an immunization or vaccination to an individual under the age of twelve (12) upon a referral from a physician who has an established physician-patient relationship with the patient, see §6512.10.

22. Can I administer vaccinations to a patient who does not have a primary care physician?

Yes, if it is a Hepatitis, Shingles, Human Papilloma virus, Tetanus, Tdap, Meningococcal, *Haemophilus influenza*, pneumococcal and influenza vaccination, and you have a signed protocol in place with a DC licensed physician that authorizes you to administer these vaccinations to any individual over the age of twelve (12) and older with parental consent, or age 18 with valid identification. Please note, that such protocol must be **expressly** limited to Hepatitis, Shingles, Human Papilloma virus, Tetanus, Tdap, Meningococcal, *Haemophilus influenza*, pneumococcal and influenza vaccinations.

Additionally, the Director of the Department of Health or his designee can approve a protocol to allow you to administer any vaccinations he determines to be appropriate for District resident populations identified by the Director as part of a public health services program such as DC Healthcare Alliance and DC Healthy Families.

23. Who is responsible for reporting any adverse events which occur in connection with or related to the administration of an immunization or vaccination?

The pharmacist who administered the immunization or vaccination is responsible to report adverse events through the [Adverse Event Reporting Process](#), per §6512.21.

24. Who do I report an adverse event that occurred in connection with the administration of an immunization or vaccination to?

Adverse events which occurred in connection with or related to the vaccine administration must be reported to The Department of Health's Pharmaceutical Control Division and The Director of the Department of Health as required under the District's Mandatory Adverse Event Reporting law and regulation.

25. How do long after the occurrence of an adverse event do I have to report?

It has to be reported within forty-eight (48) hours after discovery of the occurrence.

26. Am I required to report the administration of an immunization or vaccination to the physician who issued the written protocol if there is not an adverse event associated with the administration?

Yes. The protocol agreement must contain a statement that describes the content of, and the appropriate mechanisms for the pharmacist to report the administration of the immunization or vaccination to both the patient's primary physician, if applicable, and sufficiently identified by the patient, and the physician who issued the written protocol and the time frame in which the report is to be made, per §6512.7(g). You are also required to report the administration of the immunization or vaccination to any federal or District Immunization Information System or Registry as required under federal or District Law or as otherwise agreed in the written protocol, per §6512.20,.

27. Is an injection site reaction considered an adverse event?

An injection site reaction would not be considered an adverse event for purposes of complying with the District's Mandatory Adverse Event Reporting Law, which requires reporting to the Senior Deputy Director of the Health Regulation and Licensing Administration of the Department of Health through the [Adverse Event Reporting Process](#).

However, whether or not you would be required to report an injection site reaction to the physician who issued the protocol would depend upon the content of the written protocol and whether or not the physician indicated that he or she wanted such reactions to be reported.

28. How long am I required to maintain records of the administered immunizations and vaccinations?

Two (2) years. The records must be maintained at that pharmacy practice site where the immunization or vaccination was administered and be readily available for inspection upon request of the Board of Pharmacy or submitted to the Board of pharmacy for review upon request, per §6512.17.

29. Can pharmacy interns administer vaccinations and immunizations?

Yes as long as they are under direct supervision of a pharmacist certified to administer immunizations and vaccinations, and they have successfully completed a Board-approved certification course to administer influenza vaccinations they may do so to an adult who is eighteen (18) years of age or older, per §6512.12.