STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF PHARMACY

COVID-19 EMERGENCY GUIDANCE

This guidance document clarifies Vermont Office of Professional Regulation (OPR) and Vermont Board of Pharmacy (BOP) policies, interpretations, and recommendations to address the COVID-19 pandemic and summarizes evolving federal guidance under the Public Readiness and Emergency Preparedness Act (the "PREP Act"). This guidance is periodically modified by OPR in response to new developments.

An October 1 update (v2021-10-1)[1] added a section, at p.9, captioned *COVID-19 Therapeutics*, concerning the United States Department of Health and Human Services' Ninth Amendment to the Department's Declarations under the PREP Act. It authorizes licensed pharmacists to order and administer and qualified pharmacy technicians and pharmacy interns to administer COVID–19 therapeutics subcutaneously, intramuscularly, or orally as authorized, approved, or licensed by FDA.

This update (v2022-09-09) adds new information to the "Resources" in the "COVID-19 Therapeutics" section (p. 9) regarding the FDA's July 6, 2022 revision of the Emergency Use Authorization for Paxlovid (nirmatrelvir and ritonavir) that authorized state-licensed pharmacists to prescribe Paxlovid to eligible patients, with certain limitations.

Effect of Online Consultation on Legitimacy of Prescriptions

Vermont Board of Pharmacy Rule 10.2 provides:

> *10.2 Legitimate Prescriptions. A prescription or drug order for a legend drug is not valid unless it is issued for a legitimate medical purpose arising from a prescriber-patient relationship which includes a documented patient evaluation adequate to establish diagnoses and identify underlying conditions and/or contraindications to the treatment. Treatment, including issuing a prescription or drug order, based solely on an online questionnaire or consultation outside of an ongoing clinical relationship does not constitute a legitimate medical purpose.*

The purpose of Rule 10.2 is to ensure that a prescription drug order is based upon a legitimate and competent medical assessment of a patient based upon a bona fide prescriber-patient relationship. Remote consultation *by an existing care provider* is adequate to render a prescription "legitimate" for purposes of the Rule.

In view of the ongoing COVID-19 pandemic, remote consultation *by a provider who had no previous relationship with a patient* may be "legitimate" if a pharmacist is comfortable that:

(1) the provider is lawfully authorized to prescribe;
(2) the provider collected from the patient, whether in-person or otherwise, information adequate to assess the patient's fitness for the pharmacotherapy ordered;
(3) the provider appears to have exercised responsible professional discretion; and
(4) the prescription otherwise passes drug-utilization review.

[1] With expiration of Vermont's declared state of emergency on July 15, 2021, the following sections of this guidance became inoperative; they were removed accordingly: (1) Adjustment of Fill Quantity; 30-to-90 Switches; (2) Compounding Alcohol-Based Hand Sanitizer Products; (3) Prescription Extension and Therapeutic Substitution; and (4) Modification of Facility Access, Counseling Practices, and Employee Work Sites.

Drug Utilization Review: Clinically Inappropriate COVID-19 Related Prescribing

Pharmacists should be aware of, and are professionally responsible to adhere to, the April 10 Emergency Regulatory Order instructing pharmacists to employ enhanced drug utilization review to curb inappropriate prescribing.

For purposes of the Order, a prescription is not a "*newly established* outpatient prescription drug order" if it continues a pharmacotherapy initiated for an inpatient prior to discharge.

COVID-19 Testing

The U.S. Department of Health & Human Services (HHS) has issued guidance under the Public Readiness and Emergency Preparedness Act ("the PREP Act") authorizing pharmacists to order and administer COVID-19 tests. See the HHS Guidance for Licensed Pharmacists, COVID-19 Testing, and Immunity under the PREP Act and FDA's Emergency Use Authorizations.

Sites

Pharmacy-based COVID-19 testing sites are appropriate only for asymptomatic persons. Symptomatic persons should stay home and call their health care provider or 2-1-1 for guidance. All public notices or advertisements concerning pharmacy-based testing shall carry this instruction.

COVID-19 sample collection and testing are to occur in separately designated patient testing areas outside of pharmacies, such as drive-up windows or parking lots.

Reporting

A pharmacy that offers COVID-19 testing must report test results to the Vermont Department of Health (VDH) Health Information Exchange, as required by the Reportable and Communicable Diseases Rule, CVR 13-140-007.

A pharmacy that collects specimen samples for transmission to a reference laboratory must ensure that the laboratory has a reliable process for reporting results to the VDH Health Information Exchange.

Electronic reporting capabilities for COVID-19 results must be established and validated before testing begins. Testing facilities performing rapid tests will have two options for electronic reporting: HL7 Results Interface or .CSV File. Pharmacies are encouraged to choose the option that can be most quickly and most reliably be implemented at the facility.

OPTION 1: HL7 Results Interface *preferred method*

- HL7 electronic lab reporting is designated as a requirement of Meaningful Use under the Affordable Care Act.
- If able, the clinical lab should use their Electronic Lab System and establish an interface with these instruments.
- Facilities should inform AHS.VDHELRSupport@vermont.gov about the HL7 capabilities.
- Facilities should send HL7 messages to VDH through existing testing feeds.
    - HL7 onboarding for these COVID-19 results will be expediated.

OPTION 2: .CSV File Upload to Globalscape (.sftp site)

- Data must be populated and submitted DAILY with the required variables, value set, and schema (see attached template: CSV_Required_Fields_COVID.xlsx).
- The Health Department will work with every facility to ensure a secure file drop mechanism through existing Globalscape accounts. Contact AHS.VDHELRSupport@vermont.gov.
- The Health Department will convert the data so it can be consumed by NBS.
- This will not replace the need for continued HL7 onboarding for Meaningful Use.

Notification to Patients

A pharmacy must convey test results to patients and their primary care providers of record within 24 hours of result, in a manner that maintains patient privacy in accordance with state and federal laws and regulations. A pharmacy that collects specimen samples for transmission to an outside laboratory must ensure that the laboratory has a reliable process for conveying test results to patients and their primary care providers within 24 hours of result. VDH will supply to participating pharmacies standard-form instructions to convey with test results.

Clinical Laboratory Improvement Act (CLIA) Certificates of Waiver

A CLIA Certificate of Waiver is not required for a pharmacy to collect specimen samples for transmission *to an outside laboratory*.

A CLIA Certificate of Waiver is required for a pharmacy to collect specimen samples for CLIA-waived testing *at the pharmacy*. See the CMS document How to Apply for a CLIA Certificate of Waiver.

A pharmacy may begin testing when its CLIA number is received by electronic mail.

Identifying CLIA-waived Point-of-Care COVID-19 Tests

FDA recently clarified that, when it grants an Emergency Use Authorization (EUA) for a point-of-care test, that test is deemed to be CLIA-waived.

To identify CLIA-waived point-of-care tests:

(a.) Access the FDA's EUA website.
(b.) Scroll down to find the "In Vitro Diagnostics EUAs."
(c.) Under the heading "Authorized Setting(s)," look for tests marked "W."

Personnel & Training

Licensed pharmacists, as well as pharmacy interns and registered pharmacy technicians under the direct supervision of a pharmacist, may collect specimen samples and perform point-of-care COVID-19 testing. A pharmacy shall implement policies and procedures suited to ensure that all personnel participating in sample collection or testing are trained to perform required tasks safely, effectively, and consistently. This includes adherence to the testing device manufacturer's instructions. Completion of training must be documented. For additional information, refer to the following CDC's website sections "Guidelines for Clinical Specimens" and the Office of the Assistant Secretary for Health (OASH) COVID-19 Fact Sheet for Nasal Specimen Collection.

Personal Protective Equipment & Supplies

Guidance on infection control measures and PPE appropriate for collection and handling of patient-collected specimens is available from CDC's website. Pharmacies generally must secure their own test kits, supplies, and PPE.

Checklist
Pharmacies interested in testing may find helpful the COVID-19 Molecular Testing Pharmacy Checklist.

Standing Order for Over-The-Counter COVID-19 At-Home Antigen Test Kits
To improve availability of at-home COVID tests, on December 13th 2021, the Commissioner of Health published a Standing Order for Distribution of Covid-19 At-Home Antigen Test Kits, which has been posted to OPR's Pharmacy "Statutes, Rules & Resources" webpage. It serves as a prescription for such tests, no prescribing by pharmacists needed. See related payment information from the Department of Financial Regulation, here.

Pediatric Immunization

On August 19, 2020, the U.S. Department of Health and Human Services announced its Third Amendment to Declaration Under the Public Readiness and Emergency Preparedness Act for Medical Countermeasures Against COVID–19. The Declaration preempts state law and authorizes licensed pharmacists to order and administer, and pharmacy interns to administer, all vaccines recommended by the CDC's Advisory Committee on Immunization Practices (ACIP), and approved or licensed by the FDA, to children ages 3 to 18 during the COVID-19 pandemic.

Requirements of the Third Amendment:
- The vaccine must be FDA-approved or licensed.
- The vaccination must be ordered and administered according to the CDC's ACIP-immunization schedules.
- The licensed pharmacist must complete a practical training program of at least 20 hours that is approved by the Accreditation Council for Pharmacy Education (ACPE)—ACPE training is also required for licensed or registered pharmacy interns. Pharmacists must also complete a minimum of two hours of ACPE-approved, immunization-related continuing pharmacy education during each State licensing period
- The licensed pharmacist and licensed or registered pharmacy intern must have a current certificate in basic cardiopulmonary resuscitation.
- The licensed 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,
    - Submitting the required immunization information to the State or local immunization information system (Vermont's Vaccine Registry),
    - Complying with requirements with respect to reporting adverse events, and
    - Complying with requirements whereby the person administering a vaccine must review the vaccine registry or other vaccination records prior to administering a vaccine.
- The licensed pharmacist must inform his or her childhood-vaccination patients and the adult caregivers accompanying the children of the importance of a well-child visit with a pediatrician or other licensed primary care provider and refer patients as appropriate.

On October 20th HHS issued its Guidance for PREP Act Coverage for Qualified Pharmacy Technicians and State-Authorized Pharmacy Interns for Childhood Vaccines, COVID-19 Vaccines, and COVID-19 Testing that expands authorization for administration of ACIP-recommended pediatric vaccines to qualified pharmacy technicians, subject to certain requirements.

Requirements of the 10-20-20 Guidance Regarding Use of Pharmacy Technicians and Interns, to include those of the supervising pharmacist:
- The vaccine must be FDA-approved or licensed.
- Technicians and interns must be licensed and/or registered in accordance with state requirements
- The vaccination must be ordered by the supervising qualified pharmacist.

- The supervising qualified pharmacist must be readily and immediately available to the immunizing qualified pharmacy technicians or interns.
- The vaccination must be ordered and administered according to ACIP's standard immunization schedule.
- The supervising pharmacist must have completed the immunization training that the licensing State requires for pharmacists to order and administer vaccines.
- The qualified pharmacy technician or 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 intern must have a current certificate in basic cardiopulmonary resuscitation.
- 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.
- The qualified pharmacy technician 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.

Vermont Board of Pharmacy Required Notification
A pharmacy opting to utilize pharmacy technicians to administer ACIP-recommended pediatric vaccines shall ensure those technicians meet the HHS requirements above and shall notify the Board, supplying each participating technician's name and pharmacy location, by emailing carrie.phillips@vermont.gov

Ordering
A pharmacist may obtain a National Provider Identification (NPI) number and order vaccines directly. A pharmacist without an NPI number may order through a collaborative practice agreement with a prescriber. A standing order for adult vaccination may be amended with the express written permission of the prescriber who issued the order.

Pediatric vaccinations may be ordered 2 ways:
1) through a collaborative practice agreement with a prescriber or
2) through the 3rd amendment under the Public Readiness and Emergency Preparedness Act for Medical Countermeasures Against COVID-19 (the "PREP Act") authorizing licensed pharmacists to order and administer all vaccines recommended by the CDC's Advisory Committee on Immunization Practices for children aged 3-18 during the COVID-19 pandemic.

Communication was sent by the Department of Vermont Health Access (DVHA) to Vermont pharmacists about the requirement for enrollment into the Medicaid program, and mandatory participation with the Vermont Child Vaccine Program for provision of vaccinations to children insured by Vermont Medicaid and associated Medicaid reimbursement for vaccine administration.

Vermont Immunization Registry (IMR)
Before administering any pediatric vaccine, a pharmacist must review of each patient's current IMR "forecaster," the patient record of vaccines administered and due. Immunizations must be reported into the IMR via HL7, batch, or direct entry. Immunizations should also be communicated to the child's pediatrician.

Adverse Events
All significant adverse events that occur after vaccination, even if the immunizing health practitioner is unsure whether a vaccine caused the adverse event, shall be reported into the Vaccine Adverse Event Reporting System.

Payment
Most Vermont payers supply funds to, and participate in, the Vermont Child Vaccine Program (VCVP), which includes the federal Vaccines for Children (VFC) Program, administered by the Vermont Department of Health Immunization Program. The Immunization Program purchases and oversees distribution of pediatric vaccines to provider offices at no charge, for use in all children under 19 years of age. For this reason, pharmacies wishing to offer pediatric vaccinations should verify insurers' payment policies.

Appropriate Setting
Pharmacies wishing to provide childhood vaccination services must provide a private space for administration.

Mandatory Information Sheet
Prior to immunizing a child, a pharmacist or delegate shall furnish the child's caregiver the informational flyer appended to this guidance (see page 11).

Helpful Resources

- Vermont Department of Health Immunization Registry (to apply for IMR account, find help line, general information about IMR; for questions about how to submit a batch file, call IMR Manager 802-951-4094)
  https://www.healthvermont.gov/health-statistics-vital-records/registries/immunization

- Using Registry in Emergency Tutorials
  How to manually enter an immunization quickly https://youtu.be/PqkGfWRktB4
  How and why to add vaccine to library https://youtu.be/8SBauz0Ixoc
  How to manually add a patient https://youtu.be/NxKQj288y80
  How to Use Vaccine Forecaster https://youtu.be/lM45xc1WDW8

- CDC's ACIP-Immunization Schedules
  https://www.cdc.gov/vaccines/schedules/hcp/index.html

- 18 V.S.A. § 1129 Immunization Registry
  https://legislature.vermont.gov/statutes/section/18/021/01129

- 18 V.S.A. § 1132 Vaccine Adverse Event Reporting System
  https://legislature.vermont.gov/statutes/section/18/021/01132

COVID-19 Vaccination

On September 9, 2020, the U.S. Department of Health and Human Services issued a Guidance for Licensed Pharmacists and Pharmacy Interns Regarding COVID-19 Vaccines and Immunity under the PREP Act.

It authorizes State-licensed pharmacists to order and administer, and State-licensed or registered pharmacy interns acting under the supervision of the qualified pharmacist to administer,
to persons ages three or older COVID-19 vaccinations that have been authorized or licensed by the

Food and Drug Administration (FDA), subject to achieving the requirements of the guidance. The guidance further states that it this authorization preempts any State and local law that prohibits or effectively prohibits those who satisfy those requirements.

Requirements of the September 9th guidance

- The vaccine must be FDA-authorized or FDA-licensed.
- The vaccination must be ordered and administered according to the Advisory Committee on Immunization Practices' (ACIP's) COVID-19 vaccine recommendation.
- The licensed pharmacist must complete a practical training program of at least 20 hours that is approved by the Accreditation Council for Pharmacy Education (ACPE). This training program must include hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines.
- The licensed or registered pharmacy intern must complete a practical training program that is approved by the ACPE. This training program must include hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines.
- The licensed pharmacist and licensed or registered pharmacy intern must have a current certificate in basic cardiopulmonary resuscitation.
- The licensed pharmacist must complete a minimum of two hours of ACPE-approved, immunization-related continuing pharmacy education during each State licensing period.
- The licensed 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, submitting the required immunization information to the State or local immunization information system (vaccine registry), complying with requirements related to reporting adverse events, and complying with requirements whereby the person administering a vaccine must review the vaccine registry or other vaccination records prior to administering a vaccine.
- The licensed 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.
- The licensed pharmacist and the licensed or registered pharmacy intern must comply with any applicable requirements (or conditions of use) as set forth in the Centers for Disease Control and Prevention (CDC) COVID-19 vaccination provider agreement

As described on p. 5 - 6 of this document, HHS's Guidance of October 20th further authorizes qualified pharmacy technicians to administer COVID-19 vaccinations, providing they meet the requirements described in this guidance's section on Pediatric Vaccinations.

The *supervising pharmacist* must adhere to the following requirements, noted in the 10-20-20 HHS Guidance:

- The vaccine must be FDA-authorized or FDA-licensed and must be ordered and administered according to ACIP's COVID-19 vaccine recommendation(s)
- 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)
- 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.

Vermont Board of Pharmacy Required Notification

A pharmacy opting to utilize pharmacy technicians to administer COVID-19 vaccines shall ensure those technicians meet the HHS requirements outlined in the section on Pediatric Vaccinations and shall notify the Board, supplying the technician's name and pharmacy location, by emailing carrie.phillips@vermont.gov

Ordering

COVID-19 vaccinations may be implemented via the following pathways:

- Order placed by an individual pharmacist with their own National Provider Identification (NPI) number
- Ordering via State Protocol approved by Vermont's Commissioner of Health
- Ordering via prescription or, in an institutional setting, by standing order

Provision of services

All pharmacists and pharmacy interns wishing to administer COVID-19 vaccines must have access to, and utilize, the Vermont Department of Health Immunization Registry (IMR).

See the links and phone number below, for general information about the IMR, and how to apply for an account

- General information https://www.healthvermont.gov/health-statistics-vital-records/registries/immunization
- Form to submit for access: https://www.healthvermont.gov/sites/default/files/documents/pdf/IMR_Confidentiality_agreement_practices.pdf
- For questions about how to submit a batch file, call IMR Manager 802-951-4094

Pharmacists who will be providing COVID vaccinations to Vermont Medicaid members have additional enrollment requirements and will receive instructions about this from the Department of Vermont Health Access.

Vermont Department of Health (VDH) Resources

"Bonus-doses" Protocol for Minimizing COVID-19 Vaccine Waste

COVID-19 Therapeutics

On September 14, 2021, the United States Department of Health & Human Services issued its Ninth Amendment to Declaration Under the Public Readiness and Preparedness, authorizing licensed pharmacists to order and administer and qualified pharmacy technicians and pharmacy interns to administer COVID–19 therapeutics subcutaneously, intramuscularly, or orally as authorized, approved, or licensed by FDA.

As explained in HHS's factsheet, *PREP Act Declaration 9th Amendment – Who's Covered*, the following criteria must be met:

- The COVID-19 therapeutic must be authorized, approved, licensed, or cleared by the FDA.
- In the case of a licensed pharmacist ordering a COVID-19 therapeutic, the therapeutic must be:
    - ordered for subcutaneous, intramuscular, or oral administration and
    - in accordance with the FDA approval, authorization, clearance, or licensing.
- In the case of licensed pharmacists, qualified pharmacy technicians, and licensed or registered pharmacy interns administering the COVID-19 therapeutic, the therapeutic must be: administered subcutaneously, intramuscularly, or orally in accordance with the FDA approval, authorization, clearance, or licensing.
- In the case of qualified pharmacy technicians, the supervising pharmacist must be readily and immediately available to the qualified pharmacy technician.

- In the case of COVID-19 therapeutics administered through intramuscular or subcutaneous injections, the licensed pharmacist, licensed or registered pharmacy intern and qualified pharmacy technician must complete a practical training program that is approved by the ACPE. This training program must include:
    - hands-on injection technique,
    - clinical evaluation of indications and contraindications of COVID-19 therapeutics,
    - the recognition and treatment of emergency reactions to COVID-19 therapeutics, and
    - any additional training required in the FDA approval, authorization, clearance, or licensing.
- The licensed pharmacist licensed or registered pharmacy intern and qualified pharmacy technician must have a current certificate in basic cardiopulmonary resuscitation.
- The licensed pharmacist must comply with recordkeeping and reporting requirements of the jurisdiction in which he or she administers COVID-19 therapeutics, including informing the patient's primary-care provider when available and complying with requirements with respect to reporting adverse events.
- The licensed pharmacist, the licensed or registered pharmacy intern, and the qualified pharmacy technician must comply with any applicable requirements (or conditions of use) that apply to the administration of COVID-19 therapeutics.

Resources

FDA Emergency Use Authorizations COVID-19 Therapeutics https://www.fda.gov/emergency-preparedness-and-response/mcm-legal-regulatory-and-policy-framework/emergency-use-authorization#coviddrugs

APhA COVID-19 Therapeutics https://www.pharmacist.com/Practice/COVID-19/Therapeutics

COVID-19 Therapeutics Locator https://covid-19-therapeutics-locator-dhhs.hub.arcgis.com/

COVID-19 Test-to-Treat Locator https://aspr.hhs.gov/testtotreat/Pages/default.aspx

Office of the Assistant Secretary for Preparedness & Response, Update: FDA Authorizes Pharmacists to Prescribe Paxlovid with Certain Limitations https://aspr.hhs.gov/COVID-19/Therapeutics/updates/Pages/important-update-06July2022.aspx
Fact Sheet for Healthcare Providers: Emergency Use Authorization for Paxlovid
https://www.fda.gov/media/155050/download

Frequently Asked Questions on the Emergency Use Authorization for Paxlovid for Treatment of COVID-19
https://www.fda.gov/media/155052/download

Paxlovid Patient Eligibility Screening Checklist Tool for Prescribers https://www.fda.gov/media/158165/download

Free CPE from ASHP "Ordering and Administering COVID-19 Therapeutics: Casirivimab and Imdevimab"
https://elearning.ashp.org/products/9224/ordering-and-administering-covid-19-therapeutics-casirivimab-and-imdevimab?utm_source=10-05-21-c19cpe&utm_medium=email

Vermont Department of Health August 9, 2021 Health Alert - SARS-CoV-2 Monoclonal Antibodies for Post-Exposure Prophylaxis https://www.healthvermont.gov/sites/default/files/documents/pdf/COVID-19-HAN-MonoclonalAntibodyPost-ExposureProphylaxis.pdf

Influenza Vaccination by Pharmacy Technicians and Pharmacy Interns

On August 2, the United States Department of Health & Human Services issued its Eighth Amendment to Declaration Under the Public Readiness and Preparedness Act, authorizing qualified pharmacy technicians to administer seasonal influenza vaccines to adults, age 19 and older, within the state where they are authorized to

practice and authorizing pharmacy interns to administer seasonal influenza vaccines to adults consistent with other terms and conditions of the Declaration:

- The vaccine must be FDA-approved or licensed.
- Technicians and interns must be licensed and/or registered in accordance with state requirements
- The supervising qualified pharmacist must be readily and immediately available to the immunizing qualified pharmacy technicians or interns.
- The vaccination must be ordered and administered according to ACIP's standard immunization schedule.
- The supervising pharmacist must have completed the immunization training that the licensing State requires for pharmacists to order and administer vaccines.
- The qualified pharmacy technician or 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 intern must have a current certificate in basic cardiopulmonary resuscitation.
- 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 intern.

Vermont State Notice:
What to know about children's vaccination at the pharmacy

BEFORE

Ask if you will be charged for immunizations. For some patients, the Vermont Child Vaccine Program covers costs that may not be covered at the pharmacy.

Families without insurance can contact Vermont Health Connect for information about affordable insurance options. Call 1-855-899-9600 or visit https://info.healthconnect.vermont.gov/Get_Started

AFTER

Maintain routine well-child visits with your pediatrician, and make sure the pediatrician knows of care received elsewhere.

In the unlikely event your child experiences an adverse reaction, contact your child's pediatrician or other primary care provider.

If your child does not have a primary care provider, call 2-1-1 for help finding one. Medicaid beneficiaries can find providers accepting new patients using an online lookup tool at http://www.vtmedicaid.com/#/providerLookup