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**Vermont Pharmacist Prescribing Protocol**  
**COVID-19 and Influenza Vaccinations, ages 5 years and over**

**Background**

A pharmacist may prescribe, order, or administer COVID-19 and influenza vaccines to patients aged 5 years and over in a manner consistent with a valid State protocol approved by the Commissioner of Health, after consultation with the Director of Professional Regulation and the Board of Pharmacy (BOP). 26 V.S.A. § 2023(b)(2)(A)(viii). Pharmacists who independently prescribe COVID-19 or influenza vaccines must follow this protocol. When prescribing per this protocol, the pharmacist is the prescriber-of-record.

**Definitions**

“CBER” means the US Food and Drug Administration’s Center for Biologics Evaluation and Research.

“COVID-19 Vaccine” means a CBER-approved vaccine for the prevention and control of SARS-CoV-2 for the current COVID-19 season.

“Influenza vaccine” means a CBER-approved vaccine for the prevention and control of seasonal influenza for the current influenza season.

“Recipient” means the person, age 5 years or over, to whom a COVID-19 or influenza vaccine is being prescribed or administered.

**General considerations**

A pharmacist who prescribes a COVID-19 or influenza vaccine under this protocol must:

1. Have training and education sufficient to perform the duties involved in this protocol.
2. Comply with immunization registry and adverse reaction reporting requirements described in 18 V.S.A. § 1129 and 18 V.S.A. § 1132.
3. Document prescribing and administration of the vaccine in the patient’s prescription record.
4. Keep a written copy of this protocol at each location where COVID-19 or influenza vaccines occur.
5. Provide a copy of the protocol upon the request of an inspector.

6. Be prepared to respond to adverse vaccine reactions, as described in the Center for Disease Control and Prevention's best practice guidelines for preventing and managing adverse reactions to immunization.

### Procedures


A pharmacist who prescribes or administers a COVID-19 or influenza vaccine under this protocol:

1. must do so in accordance with the recommendations of the Commissioner of the Vermont Department of Health; and
2. may prescribe that vaccine off-label.

### Prescribing Records

The pharmacist must generate a written or electronic prescription for any COVID-19 or influenza vaccine administered pursuant to protocol-based prescribing. The prescription must include all the information required by the Administrative Rules of the Board of Pharmacy. The prescription must be processed in the same manner that any other prescription is processed, following applicable statutes and rules for the dispensing of prescription drugs. Pharmacists are reminded to adhere as applicable to Medicare and Medicaid's record-keeping requirements, which may differ from the Board's.

### APPROVED:

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Commissioner, Vermont Department of Health

Date: 9/17/2025

Signed by:  
  
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Director, Office of Professional Regulation

Date: 9/17/2025