



# MISSOURI BOARD OF PHARMACY

## IMMUNIZATION FAQ

(Revised October 30, 2009)

In 2007 and 2009, the Missouri General Assembly amended § 338.010 of the Revised Statutes of Missouri to allow pharmacists to administer meningitis, pneumonia, shingles and viral influenza vaccines by protocol with a physician. The Missouri Board of Pharmacy subsequently filed emergency rule 20 CSR 2220-6.050 which contains guidelines for administering vaccines authorized by Chapter 338, RSMo, by protocol. The emergency rules became effective on November 2, 2009. This FAQ is provided for guidance on complying with 20 CSR 2220-6.050. Licensees are encouraged to read § 338.010 and 20 CSR 2220-6.050 in their entirety to ensure compliance with Missouri law.

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**1) *I'm currently a Missouri licensed pharmacist, do I need a separate license to administer vaccines?***

No, a separate license is not required. However, as described in the rule, pharmacists must meet additional requirements and file a "Pharmacist Notification of Intent to Administer Vaccines" form with the Board, *prior to administering vaccines*. Notification forms are available on the Board's website at <http://pr.mo.gov/pharmacists-immunization-information.asp> and may be mailed or faxed to the Board.

**2) *What vaccines am I authorized to give by protocol?***

Pursuant to emergency rules filed by the Board in November 2009, Missouri pharmacists are currently authorized to administer meningitis, pneumonia, shingles and viral influenza vaccines by protocol with a physician.

**3) *I've already filed a Notification of Intent for flu vaccines, do I need to file a new Notification to administer pneumonia, shingles and meningitis vaccines?***

A new Notification of Intent is not needed if your original Notification of Intent that was filed with the Board included pneumonia, shingles or meningitis vaccines. If your Notification of Intent filed with the Board did not include/list pneumonia, shingles or meningitis vaccines, you will need to file another Notification of Intent form that includes any additional vaccines that will be administered (pneumonia, shingles or meningitis). Please note that the pharmacist's authorizing protocol(s) must also include specific authorization for the vaccines to be administered. A protocol that only includes influenza vaccines cannot be used as authorization to administer pneumonia, shingles or meningitis vaccines.

**4) *Do I need to file anything additional to administer H1N1 vaccines?***

If you have filed a Notification of Intent to administer flu vaccines and met the applicable requirements for administering flu vaccines, you do not need to file any additional paperwork with the Board to administer H1N1 vaccines.

**5) *Is there an age limit for vaccinations?***

Pharmacists may only administer vaccines by protocol to persons that are 12 years of age or older.

**6) *What qualifications/training do I need?***

To file a Notification of Intent, a pharmacist must first:

- Have a current Missouri pharmacist license that is not under discipline with the Board;
- Hold a current cardiopulmonary resuscitation (CPR) certificate issued by the American Heart Association or the American Red Cross;
- Successfully complete a certificate program in administering vaccines that is accredited by the Accreditation Council for Pharmacy Education (ACPE), and;
- Complete two (2) hours (or 0.2 CEU) of continuing education (CE) in administering vaccines per calendar year. A pharmacist may use the certificate program to satisfy the biennial pharmacist CE requirements if the certificate program was also authorized for CE credit.

**7) *Once my Notification of Intent is mailed or faxed, when can I start immunizing?***

Pharmacists may begin immunizing once a completed Notification has been mailed/faxed to the Board. The Board will notify licensees if the Notification is not acceptable/incomplete. Once notified by the Board, **a pharmacist may not immunize until a corrected/complete Notification form has been returned to the Board.** The Board recommends that pharmacists document the date of mailing/faxing and maintain a copy of the Notification for their records.

**8) *Is there a fee for filing a Notification of Intent?*** No.

**9) *Do I have to renew my Notification?***

A pharmacist must file a **new** Notification of Intent every 12-months (calculated from the date the Notification is sent to the Board). A pharmacist must complete the required two (2) CE hours in administering vaccines each time a Notification is submitted. The required 2 CE hours may be used towards the pharmacist's CE requirements for the applicable renewal period.

**10) *Who can serve as an authorizing physician?***

The authorizing physician must be a Missouri licensed physician actively practicing medicine in Missouri. The physician must be located no further than fifty (50) miles by road from the administering pharmacist, using the most direct route available.

**11) *Why does the Board require a 50-mile nexus?***

As required by statute, the immunization rules were promulgated in conjunction with the Board of Healing Arts which regulates physicians in the state of Missouri. The Board of Healing Arts required the 50-mile radius restriction to ensure consistency with the Board of Healing Arts' regulation of other healthcare professionals authorized to practice under physician supervision.

**12) *How does the Board define the 50-mile rule?***

To determine compliance, the Board verifies that the address listed in the protocol is within 50-miles of the location where the pharmacist is vaccinating.

**13) *Who should sign the protocol?***

The protocol must be signed **and** dated by the physician and **each** pharmacist authorized to administer vaccines under the protocol. A listing of the participating pharmacists is not sufficient. Instead, the protocol must be physically signed and dated by each participating pharmacist, *prior to administering vaccines.*

**14) *Do I have to renew my protocol?***

Yes. The written protocol is only valid for one (1) year from the date signed and must be renewed annually.

**15) *Do I have to file my protocol with the Board?***

No. The protocol must be maintained **by the pharmacist** and made available to the Board upon request. Protocols must be maintained for eight (8) years after the protocol is terminated.

**16) *Can a pharmacy technician or an intern pharmacist immunize under my supervision?***

No. Pursuant to rule 20 CSR 2220-6.050(2), a pharmacist may **not** delegate vaccine administration to a technician or any other person. However, an intern pharmacist may administer vaccines under the "direct supervision" of a pharmacist qualified under 20 CSR 2220-6.050. The intern pharmacist must complete the required CPR training and a qualified vaccination course.

**17) *Where can I provide immunizations?***

In 2009, the Missouri legislature amended Chapter 338, RSMo, to allow immunizations outside of a pharmacy. Subsequently, the Board promulgated emergency rule 20 CSR 2220-6.055 to allow designated non-dispensing activities outside of a pharmacy. Licensees should review the full text of the emergency rule prior to performing any immunization services outside of a pharmacy to ensure compliance with Missouri law. The full text of 20 CSR 2220-6.055 can be found on the Board's website at <http://www.pr.mo.gov/pharmacists-emergency-immunization-rules.asp>.

**18) What should the protocol contain?**

Pharmacists should review 20 CSR 2220-6.050(6) for detailed information on protocol requirements. However, a valid protocol must generally include the following:

- The names and signatures of the pharmacists and authorizing physician;
- The pharmacy or other location address where vaccines can be administered;
- The time period of the protocol & the vaccines to be administered;
- The patients or groups of patients to be vaccinated;
- The authorized routes/anatomic sites of administration;
- Minimum patient observation times & emergency response procedures;
- Provisions governing disposal of supplies;
- Recordkeeping and notification procedures, and;
- Provisions allowing the creation of a prescription for each administration.

**19) Do I need a prescription for each administration?**

Within 72-hours after administering a vaccine, the pharmacist must either procure a prescription from the authorizing physician or the pharmacist must create a prescription as outlined in the protocol.

**20) Do I have to notify my authorizing physician when I administer a vaccine?**

Yes. Within 72 hours after administration, the pharmacist is required to notify his/her authorizing physician of the patient's name, the vaccine administered, the route and site of administration, the date of administration and the dose administered.

If the authorizing physician is not the patient's primary health care provider, the pharmacist must also notify the patient's primary health care provider of the vaccination within fourteen (14) days of administration. This notification is in addition to the notification provided to the authorizing physician.

**21) What if the patient doesn't have a primary care provider or won't/can't provide me with their physician's information?**

For verification purposes, the Board recommends that the pharmacist document that the information was not provided in the immunization record.

**22) Are there any other notification requirements?**

Yes, the pharmacist must also notify the authorizing physician and the patient's primary care provider if the patient experiences any adverse events or reactions. Notification must be made within twenty-four (24) hours of the adverse event/reaction.

**23) What immunization records am I required to keep?**

Pharmacists must maintain records of each administration. Records must include:

- The patient's name, address and date of birth;
- The date, route and anatomic site of administration;
- The name and address of the patient's primary health care provider;
- The name or identifiable initials of the administering pharmacist, and;
- The nature of any adverse reactions and any physician notification(s).

**24) Where should records be kept?**

If the vaccine is administered on behalf of a pharmacy, immunization records must be kept at the pharmacy separate from the prescription files of the pharmacy. If the vaccine is not being administered on behalf of a pharmacy, the administering pharmacist is responsible for maintaining immunization records securely and confidentially at an address that must be identified in the protocol prior to administering the vaccine.

**25) How long do I have to maintain immunization records?**

Immunization records must be maintained for two (2) years after the date of the record. Prescription records must be maintained for five (5) years, as required by the rules of the Board. The protocol must be maintained for eight (8) years.

**26) *What about federal/CDC requirements?***

Immunizations must be provided in accordance with the Centers for Disease Control and Prevention guidelines or manufacturer's guidelines. Pharmacists must also comply with all other state/federal laws governing immunizations, including, Vaccine Information Statements and informed consent requirements.

**27) *Who should I call with additional questions?*** Inquiries should be directed to the Board's at [lawquestions@pr.mo.gov](mailto:lawquestions@pr.mo.gov) or at (573) 751-0091.

ADDITIONAL IMMUNIZATION INFORMATION  
AND UPDATES FROM THE BOARD ARE AVAILABLE AT  
<http://pr.mo.gov/pharmacists-immunization-information.asp>