

August 24, 2020 via E-mail
Sent to All Governors

Dear Governor and State Executive Team Members,

Last Wednesday, August 19th, the U.S. Department of Health and Human Services (HHS) authorized pharmacists and pharmacy interns to order and administer vaccines to individuals ages 3 to 18 years, subject to certain requirements during the COVID-19 pandemic. This critical action ([link to third amendment to the declaration](#)) was taken by HHS Secretary Azar under the Public Readiness and Emergency Preparedness Act (PREP Act), designed to increase access to lifesaving childhood vaccines while decreasing risk of vaccine-preventable disease outbreaks. Yet, more synergistic action is needed to ensure pharmacies are empowered to meet the health and wellness needs of your residents. More specifically, the recommendations include:

1. Affirmation: HHS' Critical Action on Childhood Vaccinations

HHS' action is clear in paving the way for pharmacists and pharmacy interns to provide vaccines to children. Yet, in providing utmost clarity, NACDS strongly urges your state to affirm that by complying with the HHS declaration pharmacists are not in violation of your state's pharmacy laws or regulations. We applaud North Carolina (NC) Board of Pharmacy (BoP) for promptly issuing such guidance and encourage your state to follow suit.

Example of Affirming State Guidance ([NC BoP](#)): "North Carolina immunizing pharmacist who orders and administers pediatric vaccines in compliance with DHHS' declaration during the federally-declared COVID-19 public health emergency shall not be deemed by the Board of Pharmacy to be in violation of the North Carolina Pharmacy Practice Act."

2. Executive Order: Remove Barriers for ADULT Flu & Other CDC Recommended Vaccines

The HHS action paves the way for pharmacists/pharmacy interns to provide vaccines to children. We urge your state to proactively take action to expand this initiative so that people of **all ages, in all communities** across the state can benefit from frictionless pharmacy-based vaccinations. Simply put, issuing an Executive Order to allow pharmacists to initiate, order and administer adult vaccinations for all residents, including ethnic and racial minorities, socioeconomically disadvantaged, those with chronic diseases, and urban and rural populations is vital to advance the health of the communities and the health of the state's economy.

3. Executive Order: Prepare Now: Remove Barriers to COVID-19 Immunizations

Likewise, we also urge your state to prepare now by issuing an executive order that explicitly allows pharmacists to initiate, order and administer FDA-authorized vaccines to individuals age 3 and older without restrictions and to provide coverage for this professional service. See Language Below. Such action will align with CDC's pandemic plans to utilize pharmacists and for communities to be prepared for a vaccine when it becomes available.

Example EO Language: "Licensed pharmacists are hereby authorized to independently initiate, order and administer vaccines authorized by the Food and Drug Administration to patients of all ages. Licensed pharmacists may delegate technical, non-clinical immunization tasks to pharmacy staff such as pharmacy technicians and pharmacy interns."

4. Executive Order: Make Existing Pharmacy Operations and Care Flexibilities Permanent

Several states have taken impressive action to provide pharmacies flexibility during COVID-19 to meet the needs of patients. For instance, nearly all states have removed barriers to COVID-19 testing, 40 states allow for remote processing of prescriptions, and 11 states allow for therapeutic interchange. While some states have taken impressive action before or during the pandemic to make sure flexibilities are permanent, we urge your state to take action to make pharmacy operations flexibilities permanent, including end-to-end testing services, which would benefit patients every day.

We greatly appreciate your immediate action to ensure patient care access for residents of your state.

Sincerely,

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