

Pharmacist Certification to Administer Immunizations and Vaccinations FREQUENTLY ASKED QUESTIONS

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.

You may also contact the Board's Health Licensing Specialist, Karin Barron, at 202-724-4900 and request to receive a copy by mail.

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

Presently the Department does not have the ability to accept credit card payments for new license applications. Application fees must be paid by either check or money order made payable to "**DC Treasurer.**" All checks that are not made payable to DC Treasurer will be returned with the applicant's application materials and delay processing.

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 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 age eighteen (18) and older.

7. 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 must be contained in the protocol, see 17 DCMR 6512.7.

8. 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 17 DCMR 6512.7.

If the written protocol is expressly limited to only 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 age eighteen (18) and older.

9. Do I need a separate protocol for each physician if I will only be administering flu and pneumonia vaccinations?

No, if the protocol is expressly limited to only pneumococcal and influenza vaccinations, one DC licensed physician can sign the protocol authorizing the pharmacist to administer these vaccinations to any individual over the age of eighteen (18) with valid I.D.

10. Can I administer vaccinations to persons under age 18 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.

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

Yes, if it is a pneumococcal or 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 18 with valid I.D. Please note, that such protocol must be expressly limited to 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.

12. 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. 17 DCMR 6599.1 defines a written 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.” 17 DCMR 6512.7 sets forth all of the elements which must be contained in the written protocol. 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 17 DCMR 6512.7.

A standing order, though currently undefined in Chapter 65, is intended to mean, “A written 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 patients, unless otherwise indicated”

13. 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 age 18 and older and eliminate the need to provide each patient with an individual prescription.

14. 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.

If the requested immunization is for pneumococcal or influenza, and you have a written protocol on file that is expressly limited to pneumococcal and influenza you may administer the immunization.

15. 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](#) under the Resources section or you may contact the Board's Health Licensing Specialist, Ms. Karin Barron, at 202-724-8938 for information.

16. 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.

17. 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 must report the Adverse Event to both the physician who issued the written protocol and to the Senior Deputy Director of the Health Regulation and Licensing Administration of the Department of Health through the [Adverse Event Reporting Process](#).

18. 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.

19. 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 the physician who issued the written protocol and the time frame in which the report is to be made.

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 or as otherwise agreed in the written protocol.

*Please note that the “or as otherwise agreed” provision means that the pharmacist and physician can agree that the pharmacist will report the immunization to the physician and the physician will be responsible for filing the report. It does not mean that the pharmacist and physician can agree not to file a report that is required by law.

20. 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.

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

No. Pursuant to 17 DCMR 6512.2(b)(2), you must possess an active certification in cardiopulmonary resuscitation **for health care providers** in order to qualify for certification.

22. The regulations state that the location in the pharmacy where vaccinations and immunizations are administered 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.