

# Pharmacy Immunization Practice in Minnesota

(Last updated December 2017)

## Who can pharmacists immunize?

Minnesota law (Minn. Stat. §151.01, subd. 27(5)) gives pharmacists the ability to vaccinate:

- Individuals 6 and older with influenza vaccine; and
- Individuals 13 and older with all recommended vaccines.

Pharmacists can only provide immunizations under protocols signed by a *physician, physician assistant or advanced practice registered nurse*. Vaccine protocols are written instructions on how and when to give a specific immunization to a defined population. The Minnesota Department of Health (MDH) provides templates for writing protocols at

<https://www.health.state.mn.us/people/immunize/hcp/protocols/index.html>

## What type of immunization training are pharmacists required to have?

As a part of the law, pharmacists must complete a course on immunization delivery prior to giving any immunizations. Courses must be accredited or approved by the:

- Accreditation Council for Pharmacy Education (ACPE); or
- Minnesota Board of Pharmacy.

## Can pharmacist-interns participate in immunizations?

Yes, pharmacist-interns who have received the sort of immunization training required for pharmacists may give immunizations. However, they must be under the direct and personal supervision of a licensed pharmacist who has also had appropriate training. That means that the pharmacist must be in close, physical proximity to the pharmacist-intern so that immunization administration can be observed and the pharmacist can immediately respond to any problems that might occur. Other health care professionals, such as physicians, physician assistants, or registered nurses, may not supervise pharmacist-interns who are giving immunizations.

For the purposes of giving immunizations, a pharmacist may supervise no more than two pharmacist-interns at one time. This 2:1 ratio applies regardless of where immunizations are given (e.g. a single pharmacist cannot supervise multiple pharmacist-interns at an immunization event). Remember that the intern: pharmacist ratio for dispensing and compounding within a licensed pharmacy is 1:1 (except that when at least one intern is completing an experiential rotation through a college of pharmacy, the ratio can be 2:1). So, in situations where an intern is giving immunizations but also participating in compounding and dispensing, the lowest applicable ratio applies.

## What immunization best practices should pharmacists follow?

Minnesota law states that pharmacists must follow immunization best practice standards set by the Advisory Committee on Immunization Practices (ACIP). Pharmacists may administer a vaccine outside of the ACIP immunizations schedules only if they receive a patient-specific order signed by a licensed Minnesota physician, PA or APRN, provided that the order is consistent with the United States Food and Drug Administration (FDA)-approved labeling of the vaccine. This means that an immunization protocol must follow the immunization schedules established by ACIP.

However, a pharmacist can administer a vaccine outside of those schedules as long as the administration is ordered for a specific patient by a physician, PA, or APRN, and as long as the vaccine is being administered in a manner approved by the FDA. *Even when administering a vaccine pursuant to a patient specific order, pharmacists must have an immunization protocol in place and must follow all portions of the protocol other than those that concern immunization schedules.* See the ACIP General Recommendations on Immunization at [www.cdc.gov/vaccines/hcp/acip-recs/recs-comprehensive.html](http://www.cdc.gov/vaccines/hcp/acip-recs/recs-comprehensive.html).

### **How are pharmacists required to use the Minnesota Immunization Information Connection (MIIC)?**

Minnesota law requires pharmacists to use the Minnesota Immunization Information Connection (MIIC) to assess a patient's immunization history before giving any immunizations, except for influenza if given to patients nine years and older. Pharmacists are also required to report all administered vaccine doses to MIIC to fulfill their immunization reporting requirement. Pharmacists no longer need to directly report administered immunizations to primary care providers or clinics, as this information will be available in MIIC. Find out more information about MIIC at [www.health.state.mn.us/divs/idepc/immunize/registry/pharmacies.html](http://www.health.state.mn.us/divs/idepc/immunize/registry/pharmacies.html). *Please also note the exception to reporting that is explained below.*

In general, as noted above, pharmacists are required to report immunizations to MIIC. However, there are situations in which pharmacists do **not** need to report to MIIC. The Board has received questions about how to fulfill the immunization reporting requirement in situations where a client has opted out of the Minnesota Immunization Information Connection (MIIC). All MIIC users, including pharmacies, are expected to follow MDH's guidelines for MIIC data use outlined in the "Data Use Agreement for [Participating in MIIC](#)" document found on the Participating in MIIC Web page. These guidelines include ensuring "that immunization information is *not* submitted to MIIC on those individuals who have indicated to the Organization their desire to opt out of MIIC." If you intend to report an administered vaccine to MIIC but find that the client has opted out or wants to opt out of MIIC, you are not expected to report that vaccination. In these cases, your intent to report sufficiently fulfills your reporting requirement.

### **What do pharmacists need to know about giving immunizations to Medicaid-eligible children?**

A pharmacist must ensure equal access to immunizations for children (defined as individuals through 18 years) enrolled in a Minnesota Health Care Program (MHCP), which includes children enrolled in Minnesota Medical Assistance (MA), MinnesotaCare, or Prepaid Medical Assistance Programs (PMAPs). This can be done by enrolling in the Minnesota Vaccines for Children (MnVFC) program. The MnVFC program will provide enrolled pharmacies with vaccines to be given to children that are in a MHCP, uninsured, or American Indian/Alaskan Native. For children enrolled in a MHCP, the pharmacy can bill the MHCP for the vaccine administration fee. More information on the MnVFC program can be found at [www.health.state.mn.us/mnvfc](http://www.health.state.mn.us/mnvfc).

If a pharmacist is not enrolled in the MnVFC program and is providing vaccines to privately insured children or to children who are cash customers, a pharmacist must also provide the same vaccines to MHCP-enrolled children free of charge. The pharmacy cannot charge MHCP-enrolled children for the cost of the vaccine or for an administration fee. Additionally, the pharmacy cannot bill the MHCP for the vaccine administration fee if they are not enrolled in the MnVFC Program.

**How can pharmacists get answers to their questions about immunization?**

- The Minnesota Board of Pharmacy provides additional information on pharmacy immunization legislation that can be found at [www.mn.gov/health-licensing-boards/pharmacy/](http://www.mn.gov/health-licensing-boards/pharmacy/).
- MDH provides additional information on immunization delivery that can be found at [www.health.state.mn.us/divs/idepc/immunize/hcp/pharmacists/index.html](http://www.health.state.mn.us/divs/idepc/immunize/hcp/pharmacists/index.html).