



## Immunizations by Registered or Certified Pharmacy Technicians

**Updated 8/25/2023**

For COVID-19 specific information, please review the following guidance documents:

- [Pharmacy Technician Administration of Vaccines during the COVID-19 Pandemic](#)

Effective September 1, 2023, [rule 4729:3-3-06 of the Administrative Code](#) authorizes a certified or registered pharmacy technician working under the direct supervision of a pharmacist to administer, subject to a physician protocol, the following immunizations:

- Any immunization for any disease to individuals 13 years old or older without a prescription.
- Any immunization for any disease to individuals ages 7-12 if there is a prescription for the immunization (except as provided below for COVID-19 vaccines and flu shots).
- FDA authorized COVID-19 vaccines and flu shots to individuals starting at seven years old without a prescription.

**REMEMBER: YOU CANNOT ADMINISTER IMMUNIZATIONS THAT ARE NOT ON YOUR PHYSICIAN-ESTABLISHED PROTOCOL.**

**NOTE:** For each immunization administered, other than an immunization for influenza administered to an individual eighteen years of age or older, the pharmacy employing the technician shall be responsible for ensuring the notification of the individual's primary care provider or, if the individual has no primary care provider, the board of health of the health district in which the individual resides. The notice shall be given not later than thirty days after the immunization is administered.

**IMPORTANT: PHARMACY TECHNICIAN TRAINEES ARE NOT PERMITTED TO ENGAGE IN IMMUNIZATION ADMINISTRATION IN OHIO.**

For questions regarding immunization administration by pharmacy technicians, please review the following frequently asked questions. If you need additional information, the most expedient way to have your questions answered will be to e-mail the Board office by visiting: <http://www.pharmacy.ohio.gov/contact.aspx>.

**Q1) How does an Ohio registered or certified pharmacy technician become authorized to administer immunizations?**

A registered or certified pharmacy technician is required to do all of the following to be authorized to administer immunizations:

- (1) Successfully complete a course in the administration of immunizations that meets the requirements established in rules by the Board of Pharmacy. Course requirements are listed in paragraph (C) of rule [4729:3-3-06](#) of the Ohio Administrative Code.
- (2) Receive and maintain certification to perform basic life-support procedures by successfully completing a basic life-support training course that is certified by the American Red Cross or American Heart Association or approved by the State Board of Pharmacy. *See Q9 for more information on this requirement.*
- (3) Practice in accordance with a definitive set of treatment guidelines specified in a protocol established by a physician that meets the requirements set forth in rule by the Board of Pharmacy.

Requirements for immunization protocols can be found in paragraph (D) of rule [4729:1-3-02](#) of the Ohio Administrative Code.

**IMPORTANT:** Paragraph (B)(6) of the rule leaves it up to the supervising pharmacist to determine if the technician is competent to administer immunizations pursuant to the rule. Additionally, the rule allows the supervising pharmacist to restrict the type of immunizations provided by the technician.

**Q2) Some pharmacy journals include continuing education on vaccines. May I take one of those courses to fulfill my obligations for immunization training?**

All training programs must comply with the requirements of paragraph (C) of rule [4729:3-3-06](#) of the Ohio Administrative Code.

**Q3) Can I administer the rabies vaccine?**

Yes, if it is administered in accordance with the physician-authorized protocol.

**Q4) Can I administer allergy shots?**

The administration of allergy shots by a pharmacy technician is not permitted by law.

**Q5) Am I required to obtain consent from a minor's parent or guardian prior to the administration of an immunization?**

Yes. For each immunization administered by a pharmacist or pharmacy intern to an individual younger than eighteen years of age, the pharmacy employing the technician shall obtain permission from the individual's parent or legal guardian. Informed consent must be obtained pursuant to rule [4729:5-5-04](#) of the Administrative Code to administer an immunization.

**Q6) What are the record keeping requirements for administering immunizations?**

Rule [4729:5-5-04](#) (l) states that all immunization records must be maintained for three years and shall include the following information:

- (1) Full name and address of the patient;
- (2) Patient's date of birth or age;
- (3) Patient's applicable allergy information;
- (4) Date of administration;
- (5) Name, strength, and dose of the immunization administered;
- (6) Lot number and expiration date of the immunization;
- (7) Route of administration;

- (8) Location of the injection site;
- (9) Positive identification of the administering technician and supervising pharmacist;
- (10) Identification of the patient, parent, or legal guardian of the patient who gives informed consent to administer the immunization.

**Q7) What are the requirements for a physician-established protocol?**

Per rule [4729:1-3-02](#) (D), a physician-established protocol for the administration of immunizations shall include the following:

- (1) For each immunization:
  - (a) Name and strength;
  - (b) Precautions and contraindications;
  - (c) Intended audience or patient population;
  - (d) Dosage;
  - (e) Administration schedules;
  - (f) Routes of administration; and
  - (g) Injection sites.
- (2) The length of time the pharmacy personnel must observe an individual for adverse effects, which shall be based on appropriate standards of care established by the physician. The location of the observation shall be in the general vicinity of the administering pharmacist or pharmacy intern to allow for ongoing evaluation.
- (3) A method to address emergency situations including, but not limited to, adverse reactions, anaphylactic reactions, and accidental needle sticks.
- (4) A method to notify an individual's primary care provider or the applicable board of health within thirty days after administering an immunization, except for influenza immunizations administered to individuals eighteen years of age and older.
- (5) The locations that a pharmacy technician under the direct supervision of a pharmacist may engage in the administration of immunizations.

**Q8) Can a registered or certified pharmacy technician that has completed the required immunization training administer immunizations under the direct supervision of a pharmacist who has not completed the required immunization training?**

No. A registered or certified pharmacy technician cannot practice outside of the scope of their supervising pharmacist.

**Q9) What basic life-support training courses certified by the American Red Cross or American Heart Association satisfy the requirements of the law?**

The Board has determined that a pharmacy technician may satisfy this training requirement by completing a certified course that either provides CPR & AED training for lay persons or a more advanced basic life-support training course for healthcare providers.

**For the American Red Cross:** This includes either [CPR/AED](#) (note First Aid is not required) or the more advanced [Basic Life Support for Healthcare Providers \(BLS\)](#).

**For the American Heart Association:** This includes either [Heartsaver® CPR AED](#) or the more advanced [Basic Life Support \(BLS\) for Healthcare Providers](#).

As a reminder, pharmacy technicians are also required to maintain such certification in order to legally administer immunizations pursuant to the law.

**NOTE:** *A course that offers a blended learning model (offering in-person training and self-directed learning) meets the requirements of the law.*

In addition, the Board adopted the following resolution on April 3, 2017:

**Recognition of Additional Basic Life Support Training for Immunization Administration (ORC 4729.41) & Administration of Other Injectable Drugs (ORC 4729.45)**

*The Board hereby recognizes that CPR/AED or Basic Life Support certification provided by American Safety and Health Institute (ASHI) meets the basic-life support training requirements pursuant to sections 4729.41 and 4729.45 of the Revised Code.*

**Q10) Am I required to follow the Advisory Committee on Immunization Practices (ACIP) recommendations under Ohio law?**

While generally encouraged, updates to section 4729.41 (effective 5/13/2021) have removed requirements to adhere to ACIP recommendations. Pharmacy technicians must still comply with the requirements set forth in their physician-established protocol.

***REMEMBER: YOU CANNOT ADMINISTER IMMUNIZATIONS THAT ARE NOT ON YOUR PHYSICIAN-ESTABLISHED PROTOCOL.***

**Q11) Are there any notification requirements?**

Yes. For each immunization administered, other than an immunization for influenza administered to an individual eighteen years of age or older, the pharmacy employing the technician shall be responsible for ensuring the notification of the individual's primary care provider or, if the individual has no primary care provider, the board of health of the health district in which the individual resides. The notice shall be given not later than thirty days after the immunization is administered.

Notification shall be conducted using one of the following methods that is capable of confirming delivery of the required notification:

- (1) Electronic mail;
- (2) Interoperable electronic medical records system;
- (3) Facsimile;
- (4) Electronic prescribing system;
- (5) Electronic pharmacy record system;
- (6) Documented verbal communication;
- (7) Reporting to the state's immunization registry; or
- (8) Any other method of notification that might reasonably be expected to allow for the confirmed transmission of the required notification.

**Q12) Is the supervising pharmacist required to ensure the competency of the immunizing technician?**

Yes. Paragraph (B)(6) of the rule leaves it up to the supervising pharmacist to determine if the technician is competent to administer immunizations pursuant to the rule. Additionally, the rule allows the supervising pharmacist to restrict the type of immunizations provided by the technician.

**Q13) Is the pharmacy employing the technician responsible for conducting assessments of the technician's competency?**

Yes. Paragraph (F) of the rule requires the pharmacy employing the technician to ensure the technician maintains the competency and skills necessary to safely administer immunizations. The pharmacy is required to ensure the technician completes an initial and annual documented competency assessment.

**Q14) What type of documentation must be maintained by the pharmacy to ensure compliance with the rule?**

The pharmacy employing a certified or registered technician authorized to provide immunizations in accordance with this rule shall maintain, or have immediate access to, the following records on file at the location(s) where the pharmacy technician administers immunizations in accordance with this rule:

1. Proof of successful completion of a training course;
2. Proof of maintenance of certification to perform basic life-support procedures; and
3. Proof of the initial and annual competency assessments.

**Q15) Are there limitations on how many immunizing technicians a pharmacist may supervise?**

Yes. There are limitations based upon where the immunizations are performed:

- A pharmacist practicing within an outpatient pharmacy shall not supervise more than three pharmacy personnel (including interns) engaged in the administration of immunizations pursuant to this rule and rule [4729:2-3-03](#) of the Ohio Administrative Code.

- A pharmacist supervising an immunization clinic outside of an outpatient pharmacy shall not supervise more than six pharmacy personnel (including interns) engaged in the administration of immunizations pursuant to this rule and rule [4729:2-3-03](#) of the Ohio Administrative Code.