Immunizations by Registered or Certified Pharmacy Technicians

Updated 10/7/2025

NOTE: *All COVID-19 information has been incorporated into this guidance.*

Section 4729.41 of the Ohio Revised Code authorizes a certified or registered pharmacy technician working under the direct supervision of a pharmacist to administer, subject to a prescriber protocol, the following immunizations:

- Any immunization for any disease, including immunizations for influenza and COVID-19, to individuals 5 years old or older without a prescription.

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

The rules on immunization administration can be accessed using the following links:

- 4729:1-3-02 Immunization administration by pharmacists.
- 4729:2-3-03 Immunization administration by pharmacy interns.
- 4729:3-3-06 Immunization administration by pharmacy technicians.

Per Ohio law, the following prescribers may authorize an immunization protocol:

1. A physician authorized under Chapter 4731. of the Revised Code to practice medicine and surgery or osteopathic medicine and surgery; or
2. A certified nurse-midwife, clinical nurse specialist, or certified nurse practitioner licensed under Chapter 4723. of the Revised Code.

This guidance applies to requirements for pharmacists and pharmacy interns. Immunization administration guidance for pharmacy technicians is available by visiting: www.pharmacy.ohio.gov/techimmunize.

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IMPORTANT: Updates to section 4729.41 (effective 5/13/2021) removed requirements to adhere to ACIP recommendations. Pharmacists, interns, and technicians must still comply with the requirements set forth in their prescriber-established protocol.

For questions regarding immunization administration, 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 OAC 4729:3-3-06.

(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 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 prescriber that meets the requirements set forth in rule by the Board of Pharmacy.

Requirements for immunization protocols can be found in paragraph (D) of OAC 4729:1-3-02.

IMPORTANT: Paragraph (B)(6) of OAC 4729:3-3-06 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.

NOTE: The following are permitted to authorize a pharmacy immunization protocol:

1. A physician authorized under Chapter 4731. of the Revised Code to practice medicine and surgery or osteopathic medicine and surgery; or
2. A certified nurse-midwife, clinical nurse specialist, or certified nurse practitioner licensed under Chapter 4723. of the Revised Code.

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 OAC 4729:3-3-06.

Q3) Can I administer the rabies vaccine?

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

Q4) Can I administer B12 or allergy shots?

The administration of B12 or 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 pharmacy technician to an individual younger than eighteen years of age, the pharmacy technician shall obtain permission from the individual's parent or legal guardian. Informed consent must be obtained pursuant to OAC 4729:5-5-04 to administer an immunization.

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

OAC 4729:5-5-04 (I) 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 prescriber-established protocol?

Per OAC 4729:1-3-02 (D), a prescriber-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 pharmacist, pharmacy intern, certified pharmacy technician, or registered pharmacy technician under the direct supervision of a pharmacist must observe an individual for adverse effects, which shall be based on appropriate standards of care established by the prescriber. The location of the observation shall be in the general vicinity of the administering pharmacist, pharmacy intern, certified pharmacy technician, or registered pharmacy technician to allow for on-going 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 pharmacist, pharmacy intern, certified pharmacy technician, or registered 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 people 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 **Cardiovascular Life Support (ACLS)**.

For the American Safety and Health Institute (ASHI): Adult First Aid | CPR AED or **Basic Life Support** Certification.

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.*

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

No. Updates to section 4729.41 (effective 5/13/2021) have removed requirements to adhere to ACIP recommendations. Pharmacists and interns must still comply with the requirements set forth in their prescriber-established protocol.

REMEMBER: YOU CANNOT ADMINISTER IMMUNIZATIONS THAT ARE NOT ON YOUR PRESCRIBER-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) Am I required to provide information on the importance of well child visits?

Yes. For each immunization administered by a pharmacist, pharmacy intern, certified pharmacy technician, or registered pharmacy technician to an individual who is younger than eighteen years of age, the pharmacist, pharmacy intern, certified pharmacy technician, or registered pharmacy technician shall inform the individual's parent or legal guardian of the importance of well child visits with a pediatrician or other primary care provider and shall refer patients when appropriate.

- The American Pharmacist Association has a handout that covers the importance of well-child visits: www.pharmacy.ohio.gov/WellChild

- The American Academy of Pediatrics offers information on well-child visits, including informational handouts. Click here for more information.

Q13) Is the supervising pharmacist required to ensure the competency of the immunizing technician?

Yes. OAC 4729:3-3-06 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.

Q14) Is the pharmacy employing the technician responsible for conducting assessments of the technician's competency?

Yes. Paragraph (F) of OAC 4729:3-3-06 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.

Q15) 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, 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.

Q16) 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.

Q17) Is it still permissible to administer COVID-19 and influenza vaccines under the federal PREP Act?

Yes. The federal PREP Act authorization was extended until 2029. For more information see Appendix I of this document and visit: https://www.federalregister.gov/documents/2024/12/11/2024-29108/12th-amendment-to-declaration-under-the-public-readiness-and-emergency-preparedness-act-for-medical

Q18) Are the Board's COVID-19 immunization waivers still in effect?

On October 6, 2025, the Board voted to rescind the remaining four COVID-19 immunization waivers. These waivers are set to expire on November 3, 2025. For more information on these waivers, visit: www.pharmacy.ohio.gov/COVID.

Appendix I – Federal COVID-19 and Influenza Vaccination Requirements

For more information, see: https://www.federalregister.gov/documents/2024/12/11/2024-29108/12th-amendment-to-declaration-under-the-public-readiness-and-emergency-preparedness-act-for-medical

	Summary of Federal PREP Act Requirements for Pharmacy Technicians
Age of Administration	The federal authorization permits the administration of any FDA-approved or FDA-licensed COVID-19 and seasonal influenza vaccines (including those under an EUA) to persons ages 3 or older.
Prescriber Approved Protocol	No prescriber-approved protocol is required, as pharmacists are authorized to order vaccines under the federal guidance. **NOTE:** The federal guidance requires the vaccination to be ordered by the supervising qualified pharmacist.
Seasonal Influenza Vaccines	In the case of seasonal influenza vaccine administered by qualified pharmacy technicians, the vaccination must be ordered and administered according to ACIP's standard immunization schedule.
Supervision Requirements	The supervising qualified pharmacist must be readily and immediately available to the immunizing qualified pharmacy technicians.
Training Requirements	The qualified pharmacy technician (i.e., registered or certified pharmacy technician) must complete a practical training program that is approved by the Accreditation Council for Pharmacy Education (ACPE). This training program must include hands-on injection technique and the recognition and treatment of emergency reactions to vaccines.

Basic Life Support Training	The pharmacy technician must have a current certificate in basic cardiopulmonary resuscitation.
Record keeping	The supervising qualified pharmacist must comply with record keeping requirements. Immunization records shall be maintained in accordance with rule 4729:5-5-04 of the Administrative Code.
Reporting	The certified or registered technician must comply with Ohio's reporting requirements.
Well-Child Visit Reminder	The supervising pharmacist must, if the patient is 18 years of age or younger, inform the patient and the adult caregiver accompanying the patient of the importance of a well-child visit with a pediatrician or other licensed primary-care provider and refer patients as appropriate.