



ACCREDITATION COUNCIL FOR PHARMACY EDUCATION

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November 19, 2020

Re: Health and Human Services Guidance and Declarations: COVID 19 & Vaccinations

Dear Pharmacy Dean,

The Accreditation Council for Pharmacy Education (ACPE) continues to monitor the educational and regulatory issues surrounding the COVID-19 pandemic and important public protection responses thereto.

The United States Department of Health and Human Services (HHS) has recently issued its guidance on ordering and administering the COVID-19 vaccines when they become available. As ACPE is specifically referenced in the guidance, I thought it may be useful to reach out to Deans from ACPE-accredited Doctor of Pharmacy Degree Programs to discuss the language of the guidance and ACPE's application of the requirements as it relates to student pharmacists and pharmacist graduates of your program.

Background:

On August 20, 2020, the Department of Health and Human Services (HHS) added statements to the Declaration under the Public Readiness and Emergency Preparedness Act (PREP Act) that increase access to lifesaving childhood vaccines and decrease the risk of vaccine-preventable disease outbreaks as children across the United States return to daycare, preschool and school. The amendment authorizes State-licensed pharmacists (and pharmacy interns) licensed or registered by their State board of pharmacy and acting under pharmacist supervision to order and administer vaccines to individuals ages three through 18 years, subject to several requirements. The original guidance may be found here:

<https://www.hhs.gov/about/news/2020/08/19/hhs-expands-access-childhood-vaccines-during-covid-19-pandemic.html>

On September 3, 2020, HHS issued a second guidance letter regarding licensed pharmacists and pharmacy interns and the administration of COVID-19 vaccines. <https://www.hhs.gov/sites/default/files/licensed-pharmacists-and-pharmacy-interns-regarding-covid-19-vaccines-immunity.pdf>

Subsequently, HHS issued additional guidance on October 20, 2020, regarding qualified pharmacy technicians and state-authorized pharmacy interns with regard to COVID-19 and Childhood vaccines.

<https://www.hhs.gov/sites/default/files/prep-act-guidance.pdf>

Finally, on October 22, 2020, HHS issued an Advisory Opinion that addressed three vaccination-related issues that have arisen under the Public Readiness and Emergency Preparedness (PREP) Act:

<https://www.hhs.gov/sites/default/files/advisory-opinion-20-03-hhs-ogc-public-readiness-emergency-preparedness-act.pdf>

ACPE Response:

In order to be recognized as a qualified pharmacist, pharmacy technician, or state-qualified pharmacy intern for purposes of COVID-19 or childhood vaccines, HHS references completion of practical training programs approved by ACPE. ACPE accredits providers of continuing education whose programs are considered in compliance with ACPE Standards for Continuing Pharmacy Education, policies, and

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procedures. Thereafter, such programs are deemed to comply with continuing education criteria as part of state-based licensure renewal.

The HHS guidance stipulates that, in order to qualify, state-licensed pharmacists must “complete a practical training program of at least 20 hours that is approved by the Accreditation Council for Pharmacy Education (ACPE). This training program must include hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines”. Further, licensed or registered pharmacy interns must complete “a practical training program that is approved by the ACPE. This training must include hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines.” In addition, the licensed pharmacist and licensed or registered pharmacy intern must have a current certificate in basic cardiopulmonary resuscitation.

Appendix 1 of ACPE Standards 2016 which lists required elements of the Didactic Doctor of Pharmacy Curriculum includes the following pertaining to public health: Exploration of population health management strategies, national and community-based public health programs, and implementation of activities that advance public health and wellness, **as well as provide an avenue through which students earn certificates in immunization delivery** and other public health-focused skills.

As Standards 2016 don’t prescribe the length or content of the immunization training provided within the curriculum, ACPE cannot state that all graduates of an ACPE-accredited degree program meet the guidance in the HHS documents. However, if the curriculum includes at least 20 hours of training that includes hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines, then the degree program may meet the spirit of the HHS guidance. Deans are encouraged to review and seek legal advice as to the compliance with and representation to students of meeting the HHS guidance.

If the immunization training that you provide is via an ACPE-accredited continuing education provider, the students’ successful completion (ACPE credit) of the CE activity will be awarded by the provider uploading the credit through CPE Monitor. The students would need to obtain an e-PID (if they do not have one yet) via NABP and provide this number along with their month and day of birth to the CE provider in order to successfully upload the credit. Should you wish to retrospectively document these student pharmacist activities, NABP may be able to accommodate that if a bulk list of students was prepared with the each of the students’ e-PID and their month and day of birth. Please contact NABP for further guidance.

If the training you provide is not from an ACPE-accredited provider, you may wish to consider providing your student pharmacists with a letter documenting completion of at least 20 hours of training that includes hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines.

Additional ACPE guidance on this topic can be found at:

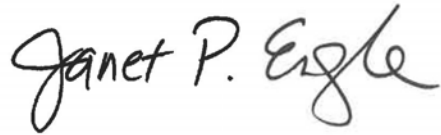
- <https://www.acpe-accredit.org/continuing-education-provider-accreditation/> (scroll down to HHS Guidance COVID19 Vaccines)
- <https://www.acpe-accredit.org/pdf/newsletters/CEProvidereUpdateV13n3November2020.pdf>

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Please note that this is a developing and fluid situation and HHS Guidance and Declarations and ACPE application of its Standards are subject to change. Please visit the ACPE website for continuous updates.

If you have questions regarding this guidance, please feel free to contact us at ceinfo@acpe-accredit.org.

Sincerely yours,

A handwritten signature in black ink that reads "Janet P. Engle". The signature is written in a cursive, flowing style.

Janet P. Engle, Pharm.D., Ph.D. (Hon), FAPhA, FCCP, FNAP
Executive Director
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