

Australian Capital Territory

Medicines, Poisons and Therapeutic Goods (Vaccinations by Pharmacists) Direction 2021 (No 4)

Disallowable instrument DI2021-287

made under the

**Medicines, Poisons and Therapeutic Goods Regulation 2008, section 352
(Authorisation for pharmacist and intern pharmacist to administer vaccine without
prescription - Act, s 37 (1)(b))**

EXPLANATORY STATEMENT

Section 352 of the Medicines, Poisons and Therapeutic Goods Regulation 2008 (the MPTG Regulation) provides that the Chief Health Officer (CHO) may, by disallowable instrument, give directions for the administration of a vaccine to a person without prescription by a pharmacist (or intern pharmacist).

This instrument is a direction of the CHO issued under section 352 of the MPTG Regulation. The direction instructs that a pharmacist or intern pharmacist may administer a vaccine without prescription if they comply with the Pharmacist Vaccination Standards (Vaccination Standards) imposed by the CHO at Schedule 1 of this instrument.

The preceding instrument DI2021-207 includes clause 5 that was a temporary amendment to Schedule 1, Part A- Pharmacist Training requirements. This amendment considered a pharmacist or intern pharmacist to meet the training requirements of Schedule 1, Part A, Items (4) and (5) if they held a first aid qualification or Cardiopulmonary Resuscitation Certificate that expired between 16 March 2020 and 31 August 2021.

DI2021-207 also includes clause 6 which was the expiry for clause 5. Clause 5 expired on 1 September 2021.

Clause 5 and 6 were initially required as it was difficult for pharmacists and interim pharmacists to complete their first aid qualifications and Cardiopulmonary Resuscitation Certificates during the initial COVID-19 lockdown in the ACT. This Direction omits clauses 5 and 6 as the effect of these clauses has expired and are no longer relevant. Pharmacists and interim pharmacists have now had sufficient time to meet their first aid and cardiopulmonary resuscitation requirements.

These Vaccination Standards are made for the purposes of establishing conditions and criteria under which registered pharmacists may initiate the administration of a vaccine to a person in absence of a supply authority (prescription).

The Vaccination Standards outline the need for administering pharmacists to comply with the following three components:

- Completion of appropriate training to administer an approved vaccine;
- Practice standards; and
- Record keeping requirements.

Part A of the Vaccination Standards specifies the training requirements for pharmacists to be authorised to administer approved substance (vaccine) in the ACT.

These training requirements are considered to be consistent with the minimum training standards required in other Australian jurisdictions, being the completion of a training course that accords with the Australian Pharmacy Council *Standards for the Accreditation of Programs to Support Pharmacist Administration of Vaccines*.

Part B of the Vaccination Standards provides an outline of general administration; premises, staffing and equipment; and administration area requirements.

Part B, section 1 sub-clause (b) of the Pharmacist Vaccination Standards enables pharmacists or intern pharmacists to administer a COVID vaccine in line with the minimum patient age that COVID vaccine is approved or provisionally approved for use by the Therapeutic Goods Administration (TGA) and no less than five years of age (where a product is approved for use in persons under the age of five years).

The minimum patient age of five years for pharmacist administration of COVID vaccines imposed by these Standards is intended to align with the current TGA provisional approval for the Comirnaty (Pfizer) vaccine and other Australian jurisdictions.

The notes under Part B, section 1, sub-clauses (b) and (c) of the Pharmacist Vaccination Standards has been removed because the advice from the TGA and the *Australian Technical Advisory Group on Immunisation (ATAGI)* around the administration of COVID-19 vaccines can change regularly. The inconsistency when a change occurs has in the past caused pharmacists confusion about COVID-19 vaccine administration.

Part B, section 1, sub-clause (c) of the Vaccination Standards to require pharmacists to administer a COVID-19 AstraZeneca vaccine in accordance with the *ATAGI clinical guidance on use of COVID-19 vaccine in Australia*, which states the COVID-19 Comirnaty (Pfizer) vaccine is preferred over the AstraZeneca vaccine for people aged less than 60 years. The intent is to ensure pharmacists only administer the AstraZeneca vaccine to persons under the age of 60 years following preferential consideration of the use of the Pfizer vaccine and following an explanation by the pharmacist of the risks and benefits of the AstraZeneca vaccine and receiving written informed consent of the patient.

The publication of *Information for health care providers to help consumers make informed decisions about the COVID-19 AstraZeneca vaccine* and supporting *Consent*

form for COVID-19 vaccination by the Australian Government at the time of notification of these Standards is expected to support pharmacists administer AstraZeneca vaccines in accordance with ATAGI clinical guidance.

Part C of the Vaccination Standards sets out recording keeping requirements for pharmacists and pharmacies. This section requires pharmacists to consult and record all vaccination events on the Australian Immunisation Register (AIR).