

Blog Post

Florida Legislation Authorizing Pharmacy Technicians to Administer Vaccines Contains Some Surprises

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Chapter 2022-60, Laws of Florida (<http://laws.flrules.org/2022/60>), that went into effect July 1, 2022, allows registered pharmacy technicians to seek certification to provide immunizations and become “Certified Registered Pharmacy Technicians.” These pharmacy technicians will be allowed to administer all of the vaccines listed by the CDC in the Adult Immunization Schedule or recommended by the CDC for international travel, as well as any vaccines authorized by the FDA under an emergency use authorization or by the Florida Board of Pharmacy in response to a state of emergency declared by the Governor. This is a big jump compared to the 2007 legislative session when the legislation first allowing pharmacists themselves to administer only the flu vaccine was enacted, and only after a hard-fought legislative battle when most other states already allowed pharmacists to administer vaccines. Fast forward to 2022 and pharmacy technicians are allowed to administer not just the flu vaccine, but nearly all the vaccines that a pharmacist can. The law still reserves to pharmacists the authority to vaccinate children 7 years of age and older.

Moreover, while pharmacists are required to have 20 hours of education to be certified to administer vaccines, pharmacy technicians can be certified with

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an approved immunization course that may require as few as six hours of education. The technician certification program will have to be approved by the Board of Pharmacy in consultation with the Boards of Medicine and Osteopathic Medicine. Granted, the pharmacy technicians can only administer vaccines under the supervision of a certified pharmacist, but this is still a significant drop in the training needed to administer vaccines. Interestingly, registered pharmacist interns (persons with five years of college) who are also under the supervision of a certified registered pharmacist must take the same 20-hour immunization course that the pharmacists take.

The law also spells out the ratio of pharmacy technicians and interns to pharmacists. While under prior law pharmacies had to have a 1:1 ratio of interns to pharmacists, the new law only requires a ratio of 5 immunizing certified interns and certified registered pharmacy technicians to 1 supervising certified registered pharmacist.

At first glance, these reductions in the number of hours needed to train a pharmacy technician to immunize patients, coupled with the increase in the number of immunizing staff being supervised by pharmacists, may raise safety concerns. However, recall that the initial education standards were established 15 years ago for pharmacists during the legislative battle over the pharmacist's scope of practice, and it is likely that the legislature has since determined that the 20-hour course was overkill and a supervised pharmacy technician simply doesn't need 20 hours of education to learn to administer vaccines to patients.

Additionally, questions regarding the 5:1 ratio are a bit of a red herring. Supervising pharmacists will have to review and certify the orders and forms before the vaccine can be provided by the pharmacy technician and at that point it is just the physical injection that will occur. Also, pharmacies normally don't have space to administer large numbers of

vaccines simultaneously, so it is hard to imagine a situation where a pharmacy had multiple certified registered pharmacy technicians all administering vaccines at the same time, even if the demand existed.

However, faced with the next pandemic or even ramping up for the increase in aging baby boomers, pharmacies are in a better position to provide the needed vaccinations and may make the drive through COVID vaccinations that we saw in 2021 a thing of the past. The upside to all of this is that these changes should increase access to needed vaccines and will help patients needing vaccines to receive their vaccine at the most accessible health care provider, the neighborhood pharmacy.

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