

GUIDANCE TO S.L. 2021-110: AN ACT TO AUTHORIZE IMMUNIZING PHARMACISTS TO DISPENSE, DELIVER, AND ADMINISTER CERTAIN TREATMENT AND MEDICATIONS

On August 19, 2021 Governor Cooper signed S.L. 2021-110, which created an authority for immunizing pharmacists to dispense, deliver, and administer certain treatment and medications. [GS § 90-85.15B\(c2\)](#) This guidance document reviews these authorities and how immunizing pharmacists may implement them.

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Q. What is an “immunizing pharmacist”?

A. An “immunizing pharmacist” is one who:

- (1) Holds a current provider level cardiopulmonary resuscitation certification issued by the American Heart Association or the American Red Cross, or an equivalent certification.
- (2) Has successfully completed a certificate program in vaccine administration accredited by the Centers for Disease Control and Prevention, the Accreditation Council for Pharmacy Education, or a similar health authority or professional body approved by the Board.
- (3) Maintains documentation of three hours of continuing education every two years, designed to maintain competency in the disease states, drugs, and vaccine administration.
- (4) Has successfully completed training approved by the Division of Public Health's Immunization Branch for participation in the North Carolina Immunization Registry.
- (5) Has notified the North Carolina Board of Pharmacy and the North Carolina Medical Board of immunizing pharmacist status.
- (6) Administers vaccines or immunizations in accordance with G.S. 90-18.15B.

[GS § 90-85.15.3\(i1\)](#)

An immunizing pharmacist must report completion of this training to the Board by logging on to their profile in the Board’s Licensure Gateway and checking the “Vaccinator” option. ***NOTE*** Falsely attesting to completion of the training is a ground for professional discipline, up to and including revocation of license.

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- Q. What new drug therapy authority does the statute grant to immunizing pharmacists?
- A. Immunizing pharmacists are authorized to dispense, deliver or administer the following without a prescription from a prescriber:
- (1) Nicotine replacement therapy that is approved by the United States Food and Drug Administration;
 - (2) Self-administered oral or transdermal contraceptives after the patient completes an assessment consistent with the CDC's U.S. Medical Eligibility Criteria for Contraceptive Use. Ulipristal acetate may not be provided for emergency contraception without a prescription.;
 - (3) Prenatal Vitamins;
 - (4) Post-exposure prophylaxis for the prevention of HIV infection consistent with guidelines and recommendations of the Centers for Disease Control and Prevention; and
 - (5) Glucagon to treat severe hypoglycemia.

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- Q: How is this authority implemented?
- A. The Pharmacy and Medical Boards have adopted statewide protocols that immunizing pharmacists must follow to exercise this authority.

The protocols are found here:

[Nicotine Replacement Therapy Protocol](#)

[Self-Administered Hormonal Contraceptive Protocol](#) (includes links to supplemental resources, patient questionnaire, and Benefits of a Primary Care Physician document)

[Prenatal Vitamins Protocol](#)

[Post-Exposure Prophylaxis \(PEP\) for HIV Protocol](#) (includes the PEP documentation and communication form and links to supplemental resources)

[Glucagon Protocol](#)

NOTE The statewide protocols are identical to the State Health Director's standing orders, which previously governed exercise of this authority.

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Q: Must an immunizing pharmacist obtain additional training to exercise authority to dispense, deliver, or administer hormonal contraceptives?

A: Yes. The hormonal contraceptive standing order requires that immunizing pharmacists complete the North Carolina Hormonal Contraception Training Program. That Program was created by a wide range of medical and pharmacy stakeholders after SL 2021-110 was enacted. The Program is incorporated into the protocol (and was incorporated into the standing order before that).

The North Carolina Association of Pharmacists administers the Program. And the Board of Pharmacy has provided a grant that makes it available, for a limited time, to North Carolina immunizing pharmacists without cost. More information here: [North Carolina Hormonal Contraception Training Program](#)

Once an immunizing pharmacist has completed the Program, the immunizing pharmacist must report that to the Board by logging on to their profile at the Board's Licensure Gateway, selecting the "Pharmacist" tile under "Licenses & Registrations", and clicking on the "Contraceptive Trained" option:

License Options ▾

 Print Annual Certificate	 Request Duplicate Wall Certificate	<input checked="" type="checkbox"/> Vaccinator
<input checked="" type="checkbox"/> CSRS	<input checked="" type="checkbox"/> LAI Trained	<input checked="" type="checkbox"/> Contraceptive Trained

License Options ▾

 Print Annual Certificate	 Request Duplicate Wall Certificate	<div style="background-color: black; color: white; padding: 5px;"><p>By clicking this box and turning it green, you are attesting that you have completed the North Carolina Hormonal Contraception Training Program required by the state standing order.</p></div>
<input checked="" type="checkbox"/> CSRS	<input checked="" type="checkbox"/> LAI Trained	<input checked="" type="checkbox"/> Contraceptive Trained

NOTE Falsely attesting to completion of the training is a ground for professional discipline, up to and including revocation of license.

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Q: What recordkeeping and notifications requirements must an immunizing pharmacist follow when exercising this authority?

A. The immunizing pharmacist must:

- (1) Maintain a patient profile that includes any medications provided under this authority.
- (2) Notify a patient's identified primary care provider with 72 hours of doing so. If the patient does not identify a primary care provider, direct the patient to information about the benefits of having one. (Similar to the requirement for vaccinations)
- (3) Provide records to the patient or the patient's primary care provider on request.
- (4) If a hormonal contraceptive is dispensed, counsel the patient about preventative care, including well-woman visits, sexually transmitted infection testing information, and Pap smear testing.
- (5) Provide the name, address, phone, and fax of the pharmacy on any communication with a prescriber/primary care provider.
- (6) Provide the name of the immunizing pharmacist who dispenses, delivers, or administers medication under this authority on any communication with the provider.

The process and procedures are further spelled out in the protocols.