



OFFICE OF THE DIRECTOR

Kate Brown, Governor

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May 21, 2020

Steven C. Anderson, FASAE, CAE, IOM
National Association of Chain Drug Stores
President and Chief Executive Officer
1776 Wilson Blvd. Suite 200
Arlington, VA 22209

Dear Mr. Anderson:

Thank you for your letter of May 13, 2020. We appreciate your input.

We understand that some pharmacists believe we have made a change to their scope, but we have not. The Oregon Health Authority (OHA) has not included “shared clinical decision making” or “category B recommendations” in previous immunization pharmacy protocols. When the ACIP changed their recommendation for PCV13 for adults over 65 years of age from a routine recommendation to “shared clinical decision making,” we updated our immunization protocols to reflect the ACIP change and the Board of Pharmacy received questions. Working with the Board of Pharmacy, we published guidance to clarify what is included in immunization protocols.

CDC’s Advisory Committee on Immunization Practices (ACIP) makes two types of national recommendations: Those for population health where the default decision should be to vaccinate the patient based on age group or other indications, unless contraindicated (these were formerly called “Category A” recommendations); and “shared clinical decision-making recommendations” (formerly “Category B”), in which vaccination is not recommended for all members of a demographic or risk group, and the decision to vaccinate should be individualized—informed by the best available evidence of who may benefit from vaccination; the individual’s characteristics, values, and preferences; the health care provider’s clinical discretion; and the characteristics of the vaccine being considered.

Oregon law guides what is included in a pharmacist’s scope of practice and charges the Board of Pharmacy to write administrative rules governing what pharmacists must do to be a vaccinator. OAR 855-019-0270(3)(d) requires that vaccines be administered in accordance with OHA-written protocols.

OHA believes that routinely recommended immunizations (Category A) are appropriate for administration under a protocol or standing order, but vaccines that require clinical decision making and significant medical history conversations (Category B) are not. For those, prescribing providers can send a prescription to a patient’s pharmacy and at that point an immunizing provider can administer.

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During the COVID-19 pandemic, OHA will continue our practice of providing written protocols for Category A vaccines only. We will bring stakeholders together to review this decision in 2021 – or earlier if the pandemic slows enough for a concerted focus on this topic.

Sincerely,

A handwritten signature in blue ink, appearing to read 'P. Allen', with a long horizontal stroke extending to the right.

Patrick M. Allen

Director

EC: Angie Allbee, Senior Policy Advisor, Oregon Health Authority
Joseph Schnabel, Executive Director, Oregon Board of Pharmacy